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FORMAL COMPLAINT OF § BEFORE THE STATE OFFICE
ADC WEST RIDGE, L.P. AND §
CENTER FOR HOUSING § OF
RESOURCES, INC. AGAINST THE §
CITY OF FRISCO § ADMINISTRATIVE HEARINGS

NOTICE OF ORAL DEPOSITION OF
LORI CHAPIN AND SUBPOENA DUCES TECUM

TO: Lori Chapin, by and through the City of Frisco, Texas, and its attorney of record, Art Rodriguez, Russell & Rodriguez, L.L.P., 1633 Williams Dr., Bldg. 2, Suite 200, Georgetown, Texas 78268

PLEASE TAKE NOTE THAT, Complainants ADC West Ridge Villas, L.P. and Center for Housing Resources, Inc. (collectively, "Complainants"), by and through their attorney, intend to take the oral deposition of Lori Chapin on December 19, 2016, at 10:00 a.m. at the law offices of Abernathy, Roeder, Boyd & Hullett, P.C. at 1700 Redbud Blvd., Suite 300, McKinney, Texas 75069 pursuant to PUC Procedural Rule 22.143, 16 Tex. Admin. Code § 22.145. The deposition will be taken before a court reporter and shall continue from day-to-day until completed. The deposition and any documents produced at or prior to such deposition may be used as evidence at the hearing on the merits. Please be advised that Ms. Terri Anderson, Mr. Jack Stowe, or any expert witness of Complainants with knowledge related to the area of your testimony may attend this deposition.

Lori Chapin is further commanded to produce at said time and place set forth above, the following books, records, papers, documents, or other tangible things:

- a. All deposition, hearing, or trial testimony of Lori Chapin in any other proceeding before any state or federal court or state or federal agency relating to Lori Chapin's opinions regarding the City's development requirements, utility planning, and impact of development on the City.

- b. All documents provided to, reviewed by, or prepared by or for Lori Chapin in anticipation of her testimony in this proceeding.
- c. All written communications between Lori Chapin and any party to this proceeding relating to this proceeding or the subject matter of this proceeding.

This notice and subpoena duces tecum was issued upon agreement of the parties, and the parties have waived the requirement of the issuance of a commission. This notice, as mailed to Lori Chapin through Art Rodriguez, shall also serve as a subpoena as authorized by Rule 176 of the Texas Rules of Civil Procedure.

Respectfully submitted,

JACKSON WALKER L.L.P.

By: /s/ Mallory Beck

Leonard Dougal - State Bar No. 06031400

Ali Abazari - State Bar No. 00796094

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ATTORNEYS FOR COMPLAINANTS
ADC WEST RIDGE VILLAS L.P., AND
CENTER FOR HOUSING RESOURCES, INC.

CERTIFICATE OF SERVICE

I hereby certify that the above and foregoing document was served as shown below on
this 9th day of December 2016:

Via email and U.S. First Class Mail

Art Rodriguez
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/s/ Mallory Beck
Mallory Beck