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

BEFORE THE STATE OFFICE OF  
PUC COMMISSIONER  
FILING CLERK

ADMINISTRATIVE HEARINGS

NOTICE OF INTENTION  
TO TAKE ORAL DEPOSITION OF  
MR. PERRY STEGER

TO: Mr. Perry Steger, by and through ADC Westridge L.P. and the Center for Housing Resources, Inc., and their attorney of record, Leonard Dougal, Jackson Walker, L.L.P., 100 Congress, Suite 1100, Austin, Texas, 78701.

PLEASE TAKE NOTICE THAT the City of Frisco ("City"), by and through its attorney, intends to take the oral deposition of Mr. Perry Steger on December 15, 2016, at 1:00 p.m. at the law offices of Jackson Walker, L.L.P., 100 Congress Ave., Suite 1100, Austin, Texas, 78701 pursuant to P.U.C. Procedural Rule 22.143. The deposition will be taken before Kennedy Reporting, 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. A representative of your choice is invited to attend and cross-examine you, as the witness. Please be advised that a City representative and any City expert witness with knowledge related to the area of your testimony, and any City attorney and/or paralegal may attend this deposition.

Mr. Perry Steger is further commanded to produce at said time and place set forth above, the following books, records, papers, document, or other tangible things:

- a. His current resume or bibliography.
- b. All documents, tangible things, reports, models, or data compilations that have been provided to, reviewed by, or prepared by or for Perry Steger, in anticipation of his testimony.

- c. All documents provided to, reviewed by, or prepared by or for Perry Steger when responding on behalf of ADC Westridge L.P. and the Center for Housing Resources, Inc. to any requests, submittals, or communications with any employee or representative of the City of Frisco, Texas or anyone working on behalf of the City of Frisco related to the development of the property at 9331 Westridge Blvd. in Collin County, Texas.
- d. All deposition, hearing, or trial testimony of Mr. Perry Steger in any proceedings before any state or federal court or state or federal agency relating to Mr. Steger's opinions regarding certificates of convenience and necessity for water and/or sewer service.
- e. All documents reviewed by, or prepared by or for Levi Wild, which leads him to an opinion regarding the potential impact of ADC Westridge L.P. and/or the Center for Housing Resources, Inc.'s "proposed development on the utility systems of the City of McKinney and the City of Frisco" as stated in *Complainants' Supplemental Response to Order No. 3 and Rule 194.2 Expert Disclosures* on October 26, 2016, in this docket.

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 Mr. Perry Steger through Leonard Dougal shall serve as a subpoena as authorized by Rule 176 of the Texas Rules of Civil Procedure.

Respectfully submitted,

**Russell & Rodriguez, L.L.P.**  
1633 Williams Drive, Building 2, Suite 200  
Georgetown, Texas 78628  
(512) 930-1317  
(866) 929-1641 (Fax)

**Abernathy Roeder Boyd & Hullett, P.C.**

Richard Abernathy

State Bar No. 00809500

1700 Redbud Blvd., Suite 300

McKinney, Texas 75069

(214) 544-4000

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/s/ Arturo D. Rodriguez, Jr.

ARTURO D. RODRIGUEZ, JR.

State Bar No. 00791551

**ATTORNEYS FOR THE CITY OF FRISCO**

## CERTIFICATE OF SERVICE

I hereby certify that on this 9th day of December, 2016, a true and correct copy of the foregoing document has been sent via facsimile, first class mail, or hand-delivered to the following counsel of record:

Mr. Sam Chang  
Public Utility Commission of Texas  
1701 N. Congress Avenue  
Austin, Texas  
(512) 936-7261  
*Via Electronic Mail*

Mr. Ali Abazari  
Ms. Mallory Beck  
Jackson Walker, LLP  
100 Congress Avenue, Suite 1100  
Austin, Texas 78701  
(512) 236-2000  
*Via Electronic Mail*

/s/ Arturo D. Rodriguez, Jr.  
ARTURO D. RODRIGUEZ, JR.