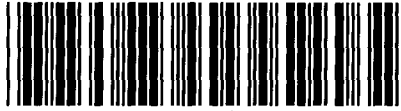


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PUC DOCKET NO. 45870**

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

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**BEFORE THE STATE OFFICE OF PUBLIC UTILITY COMMISSION
FILING CLERK
ADMINISTRATIVE HEARINGS**

**NOTICE OF ORAL DEPOSITION OF
MR. STAN FULKS**

TO: Mr. Stan Fulks, 16800 Westgrove Drive, Suite 400, Addison, Texas 75001

PLEASE TAKE NOTICE THAT the City of Frisco ("City"), by and through its attorney, will take the oral deposition of Mr. Stan Fulks on January 11, 2017, at 9:00 a.m. at the law offices of Abernathy Roeder Boyd & Hullett, P.C., 1700 Redbud Blvd., Suite 300, McKinney, Texas 75069 pursuant to Public Utility Commission of Texas Procedural Rule 22.143. The deposition will be taken stenographically before a court reporter, and shall continue from day-to-day until completed. The stenographic recording will be conducted by Stormy Jackson Reporting Services. 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. Stan Fulks 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 Stan Fulks, in anticipation of his testimony.

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- c. All documents, including but not limited to, any and all reports, notes, contracts, agreements, memorandum, communications, electronic mail, texts, or other correspondence pertaining to the property located in the extraterritorial jurisdiction of the City of Frisco with the address of 9331 Westridge Boulevard in Collin County, Texas.
- d. All documents reflecting communications between you and Ker-Seva Ltd., concerning the property located in the extraterritorial jurisdiction of the City of Frisco with the address of 9331 Westridge Boulevard in Collin County, Texas.
- e. All documents reflecting communications between you and ADC West Ridge, LP, concerning the property located in the extraterritorial jurisdiction of the City of Frisco with the address of 9331 Westridge Boulevard in Collin County, Texas.
- f. All documents reflecting communications between you and Center for Housing Resources, Inc., concerning the property located in the extraterritorial jurisdiction of the City of Frisco with the address of 9331 Westridge Boulevard in Collin County, Texas.
- g. All documents reflecting communications between you and any other person or entity, including the cities of McKinney and Frisco and the county of Collin, concerning the property located in the extraterritorial jurisdiction of the City of Frisco with the address of 9331 Westridge Boulevard in Collin County, Texas.

This notice and subpoena duces tecum was issued pursuant to a subpoena issued by an Administrative Law Judge presiding over this matter. This notice, as mailed to Mr. Joe Thomason 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

(214) 544-4040 (Fax)

/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. Leonard Dougal
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.