



Control Number: 45870



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SOAH DOCKET NO. 473-16-4619.WS
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
PUBLIC UTILITY COMMISSION
FILING CLERK
OF
ADMINISTRATIVE HEARINGS

**ADC WEST RIDGE, L.P. AND CENTER FOR HOUSING RESOURCES, INC.'S
SUPPLEMENTAL RESPONSES TO CITY OF FRISCO'S SECOND SET OF
REQUESTS FOR INFORMATION AND REQUESTS FOR ADMISSION**

ADC West Ridge, L.P. and Center for Housing Resources, Inc. ("Complainants") file these Supplemental Responses to City of Frisco's ("Frisco RFI") Second Set of Requests for Information ("RFI") and Requests for Admission ("RFA") pursuant to SOAH Order No. 7. These responses are timely filed. ADC West Ridge, L.P. and Center for Housing Resources, Inc. agree and stipulate that all parties may treat these responses as if the answers were filed under oath. Complainants and Frisco agreed to amend some of the requests which are reflected herein.

Respectfully submitted,

JACKSON WALKER L.L.P.

By: /s/ Mallory Beck
Leonard Dougal - State Bar No. 06031400
Ali Abazari - State Bar No. 00796094
Mallory Beck - State Bar No. 24073899
100 Congress, Suite 1100
Austin, Texas 78701
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ATTORNEYS FOR COMPLAINANTS
ADC WEST RIDGE 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 January 2017:

Art Rodriguez
Russell & Rodriguez, L.L.P.
1633 Williams Dr., Bldg. 2, Suite 200
Georgetown, Texas 78268
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Attorney for City of Frisco

Via email and U.S. First Class Mail

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/s/ Mallory Beck
Mallory Beck

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RESOURCES, INC.'S RESPONSES TO CITY OF FRISCO'S SECOND SET OF
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Frisco RFI 106: Please produce all documents evidencing any easements or other property interest acquired or attempted to be acquired to receive retail water service to by ADC West Ridge to:

- a. The Property
- b. Lot 1
- c. Lot 2

RESPONSE:

Please see documents produced in response to RFI Nos. 11, 12, 14, and 15, and bates labeled ADC01441-01460 and documents produced herein and bates labeled ADC02059-2068 and ADC02119-02123.

Prepared/Sponsored by: Terri Anderson
 Authorized Representative of
 ADC West Ridge, L.P. & Center for Housing Resources, Inc.

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Frisco RFI 107: Please produce all documents evidencing any easements or other property interest acquired or attempted to be acquired to receive retail water service to by Center for Housing Resources to:

- a. The Property
- b. Lot 1
- c. Lot 2

RESPONSE:

Please see documents produced in response to RFI Nos. 11, 12, 14, and 15, and bates labeled ADC01441-01460, and documents produced herein and bates labeled ADC02059-2068 and ADC02119-02123.

Prepared/Sponsored by: Terri Anderson
Authorized Representative of
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RESOURCES, INC.'S RESPONSES TO CITY OF FRISCO'S SECOND SET OF
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Frisco RFI 109: Please produce all documents evidencing any easements or other property interest acquired or attempted to be acquired to receive retail sewer service to by ADC West Ridge to:

- a. The Property
- b. Lot 1
- c. Lot 2

RESPONSE:

Please see documents produced in response to RFI Nos. 11, 12, 14, and 15, and bates labeled ADC01441-01460, and documents produced herein and bates labeled ADC02059-2068 and ADC02119-02123.

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Frisco RFI 110: Please produce all documents evidencing any easements or other property interest acquired or attempted to be acquired to receive retail water service to by Center for Housing Resources to:

- a. The Property
- b. Lot 1
- c. Lot 2

RESPONSE:

Please see documents produced in response to RFI Nos. 11, 12, 14, and 15, and bates labeled ADC01441-01460, and documents produced herein and bates labeled ADC02059-2068 and ADC02119-02123.

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RESOURCES, INC.'S RESPONSES TO CITY OF FRISCO'S SECOND SET OF
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Frisco RFI 112: Please produce all documents regarding any communication with the City of McKinney to receive retail water service by ADC West Ridge to:

- d. The Property
- e. Lot 1
- f. Lot 2

RESPONSE:

Please see documents produced in response to RFI Nos. 11, 12, 14, 15, and 229, documents produced in response to Order No. 3, including those bates labeled ADC01866-01931 and ADC02353-02363.

Prepared/Sponsored by: Terri Anderson
Authorized Representative of
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Frisco RFI 113: Please produce all documents regarding any communication with the City of McKinney to receive retail water service by Center for Housing Resources to:

- d. The Property
- e. Lot 1
- f. Lot 2

RESPONSE:

Please see documents produced in response to RFI Nos. 11, 12, 14, 15, and 229, documents produced in response to Order No. 3, including those bates labeled ADC01866-01931 and ADC02353-02363.

Prepared/Sponsored by: Terri Anderson
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Frisco RFI 115: Please produce all documents regarding any communication with the City of McKinney to receive retail sewer service by ADC West Ridge to:

- d. The Property
- e. Lot 1
- f. Lot 2

RESPONSE:

Please see documents produced in response to RFI Nos. 11, 12, 14, 15, and 229, documents produced in response to Order No. 3, including those bates labeled ADC01866-01931 and ADC02353-02363.

Prepared/Sponsored by: Terri Anderson
 Authorized Representative of
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Frisco RFI 116: Please produce all documents regarding any communication with the City of McKinney to receive retail sewer service by Center for Housing Resources to:

- d. The Property
- e. Lot 1
- f. Lot 2

RESPONSE:

Please see documents produced in response to RFI Nos. 11, 12, 14, 15, and 229, documents produced in response to Order No. 3, including those bates labeled ADC01866-01931 and ADC02353-02363.

Prepared/Sponsored by: Terri Anderson
 Authorized Representative of
 ADC West Ridge, L.P. & Center for Housing Resources, Inc.

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Frisco RFI 120: After the entry on 10/6/2016 in Exhibit B, the following text appears: *"Frisco and McKinney inspectors and police drive by constantly intimidating contractors, parking on site and stopping work without jurisdiction threatening statutorily prohibited arrest and fines."* Please detail all such incidences referred to in the quoted text, including the date the incidences occurred. Please include the date, name, position, and address of each person involved in such incidences. In addition, produce all documents that relate to each incident referred to in the quoted text.

RESPONSE:

There have been numerous incidences as explained in the quoted sentence. On numerous occasions, the dates of which have not been recorded, police officers from either the City of McKinney or the City of Frisco have passed by or stopped at the site. The date such incidences occurred were not recorded outside of the document from which this quote was obtained or in e-mails written at or near the time of these incidences. Terri Anderson was present for some of those incidences along with employees of KWA Construction, LLC and/or various subcontractors. David Turnbow, Luis Gonzalez, and Stan Fulks were present for at least one of these incidences. On or about June 24, 2016, Randy Roland, the Assistant Police Chief for McKinney was present on the site. On or about September 14, 2016, police officers from the City of Frisco were present on the site. On or about October 6, 2016, police officers from the City of Frisco were present on the site. On or about December 30, 2016, George Hill, Sr. Construction Engineer, Gary Minter, Right-of-Way Inspector/Permits, and Police Officer T. Allie all from the City of McKinney were present on the site. Please see the documents produced in response to RFI Nos. 11, 12, 14, 15, 118, and 119 and bates labeled ADC01675-01682. Please also see the documents produced herein bates labeled ADC02308-02309 and ADC02364-02365.

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Frisco RFI 121: For the entry dated 9/15/2016 on Exhibit B, please produce all documents that relate to any statement or assertion contained in said entry.

RESPONSE:

Please see the documents produced in response to RFI Nos. 11, 12, 14, 15, 118, 119, and 120, the audio filed bates labeled through its file name as ADC01440 and the document bates labeled ADC01683. Please also see documents enclosed herein and bates labeled ADC02308-02309 and ADC02364-02365.

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RESOURCES, INC.'S RESPONSES TO CITY OF FRISCO'S SECOND SET OF
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Frisco RFI 123: For the entry dated 1/7/2015 on Exhibit B, please produce all documents that relate to any statement or assertion contained in said entry.

RESPONSE:

Please see documents produced in response to RFI Nos. 11, 12, 14, 15, and 118, and the documents enclosed herein and bates labeled ADC01967-02068 and ADC02074.

Prepared/Sponsored by: Terri Anderson
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Frisco RFI 125: For the entry dated 1/26/2015 on Exhibit B, please produce all documents that relate to any statement or assertion contained in said entry.

RESPONSE:

Please see documents produced in response to RFI Nos. 11, 12, 14, 15, and 118 and the documents enclosed herein and bates labeled ADC01967-02068.

Prepared/Sponsored by: Terri Anderson
Authorized Representative of
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Frisco RFI 127: For the entry dated 2/13/2016 on Exhibit B, please produce all documents that relate to any statement or assertion contained in said entry.

RESPONSE:

Please see documents produced in response to RFI Nos. 11, 12, 14, 15, and 118, and the documents enclosed herein and bates labeled ADC01967-02068.

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Frisco RFI 129: For the entry dated 2/16/2015 on Exhibit B, please produce all documents that relate to any statement or assertion contained in said entry.

RESPONSE:

Please see documents produced in response to RFI Nos. 11, 12, 14, 15, 118, 197, and 198, and documents enclosed herein bates labeled ADC02074.

Prepared/sponsored by: Terri Anderson
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RESOURCES, INC.'S RESPONSES TO CITY OF FRISCO'S SECOND SET OF
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Frisco RFI 131: For the entry dated 2/17/2015 on Exhibit B, please produce all documents that relate to any statement or assertion contained in said entry.

RESPONSE:

Please see documents produced in response to RFI Nos. 11, 12, 14, 15, and 118 and the documents enclosed herein and bates labeled ADC02059-02068.

Prepared/Sponsored by: Terri Anderson
Authorized Representative of
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Frisco RFI 133: For the entry dated 2/20/2015 on Exhibit B, please produce all documents that relate to any statement or assertion contained in said entry.

RESPONSE:

Please see the documents produced in response to RFI Nos. 11, 12, 14, 15, and 118 and documents enclosed herein bates labeled ADC01967-02068.

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Frisco RFI 135: For the entry dated 2/24/2015 on Exhibit B, please produce all documents that relate to any statement or assertion contained in said entry.

RESPONSE:

Please see documents produced in response to RFI Nos. 11, 12, 14, 15, and 118, and bates labeled ADC01684-01685.

Prepared by/sponsored by: Terri Anderson
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Frisco RFI 137: For the entries dated 3/3/2015 on Exhibit B, please produce all documents that relate to any statement or assertion contained in said entry.

RESPONSE:

Please see documents produced in response to RFI Nos. 11, 12, 14, 15, and 118, and the documents bates labeled ADC01686-01702, and the documents enclosed herein and bates labeled ADC02059-02068.

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Frisco RFI 139: For the entry dated 3/16/2015 on Exhibit B, please produce all documents that relate to any statement or assertion contained in said entry.

RESPONSE:

Please see documents produced in response to RFI Nos. 11, 12, 14, 15, and 118.

Prepared by/sponsored by: Terri Anderson
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Frisco RFI 141: For the entry dated 3/25/2015 on Exhibit B, please produce all documents that relate to any statement or assertion contained in said entry.

RESPONSE:

Please see documents produced in response to RFI Nos. 11, 12, 14, 15, 118, and documents produced herein and bates labeled ADC02137-02145.

Prepared by/sponsored by: Terri Anderson
Authorized Representative of
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Frisco RFI 143: For the entry dated 4/2/2015 on Exhibit B, please produce all documents that relate to any statement or assertion contained in said entry.

RESPONSE:

Please see documents produced in response to RFI Nos. 11, 12, 14, 15, and 118 and documents produced herein bates labeled ADC02104-2107, ADC02134-02136, and ADC02144-02145.

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Frisco RFI 145: For the entry dated 4/6/2015 on Exhibit B, please produce all documents that relate to any statement or assertion contained in said entry.

RESPONSE:

Please see documents produced in response to RFI Nos. 11, 12, 14, 15, and 118 and documents enclosed herein and bates labeled ADC02059-02068.

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Frisco RFI 147: For the entry dated 4/21/2015 on Exhibit B, please produce all documents that relate to any statement or assertion contained in said entry.

RESPONSE:

Please see documents produced in response to RFI Nos. 11, 12, 14, 15, and 118.

Prepared by/sponsored by: Terri Anderson
Authorized Representative of
ADC West Ridge, L.P. & Center for Housing Resources, Inc.

**SOAH DOCKET NO. 473-16-4619.WS
PUC DOCKET NO. 45870**

FORMAL COMPLAINT OF ADC WEST RIDGE, L.P. AND CENTER FOR HOUSING RESOURCES, INC. AGAINST THE CITY OF FRISCO	§ § § § §	BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS
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**KER-SEVA, LTD., ADC WEST RIDGE VILLAS, L.P. AND CENTER FOR HOUSING
RESOURCES, INC.'S RESPONSES TO CITY OF FRISCO'S SECOND SET OF
REQUESTS FOR INFORMATION AND REQUESTS FOR ADMISSION**

Frisco RFI 149: For the entry dated 4/28/2015 on Exhibit B, please produce all documents that relate to any statement or assertion contained in said entry.

RESPONSE:

Please see documents produced in response to RFI Nos. 11, 12, 14, 15, and 118 and documents enclosed herein bates labeled ADC02110-02111 and ADC02124-02129.

Prepared by/sponsored by: Terri Anderson
Authorized Representative of
ADC West Ridge, L.P. & Center for Housing Resources, Inc.

**SOAH DOCKET NO. 473-16-4619.WS
PUC DOCKET NO. 45870**

FORMAL COMPLAINT OF ADC WEST RIDGE, L.P. AND CENTER FOR HOUSING RESOURCES, INC. AGAINST THE CITY OF FRISCO	§ § § § §	BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS
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**KER-SEVA, LTD., ADC WEST RIDGE VILLAS, L.P. AND CENTER FOR HOUSING
RESOURCES, INC.'S RESPONSES TO CITY OF FRISCO'S SECOND SET OF
REQUESTS FOR INFORMATION AND REQUESTS FOR ADMISSION**

Frisco RFI 151: For the entry dated 5/5/2015 on Exhibit B, please produce all documents that relate to any statement or assertion contained in said entry.

RESPONSE:

Please see documents produced in response to RFI Nos. 11, 12, 14, 15, and 118 and documents enclosed herein and bates labeled ADC02124-02129.

Prepared by/sponsored by: Terri Anderson
Authorized Representative of
ADC West Ridge, L.P. & Center for Housing Resources, Inc.

**SOAH DOCKET NO. 473-16-4619.WS
PUC DOCKET NO: 45870**

FORMAL COMPLAINT OF ADC WEST RIDGE, L.P. AND CENTER FOR HOUSING RESOURCES, INC. AGAINST THE CITY OF FRISCO	§ § § § §	BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS
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**KER-SEVA, LTD., ADC WEST RIDGE VILLAS, L.P. AND CENTER FOR HOUSING
RESOURCES, INC.'S RESPONSES TO CITY OF FRISCO'S SECOND SET OF
REQUESTS FOR INFORMATION AND REQUESTS FOR ADMISSION**

Frisco RFI 153: For the entry dated 5/22/2015 on Exhibit B, please produce all documents that relate to any statement or assertion contained in said entry.

RESPONSE:

Please see documents produced in response to RFI Nos. 11, 12, 14, 15, and 118 and documents enclosed herein and bates labeled ADC02124-02136.

Prepared by/sponsored by: Terri Anderson
Authorized Representative of
ADC West Ridge, L.P. & Center for Housing Resources, Inc.

**SOAH DOCKET NO. 473-16-4619.WS
PUC DOCKET NO. 45870**

FORMAL COMPLAINT OF ADC WEST RIDGE, L.P. AND CENTER FOR HOUSING RESOURCES, INC. AGAINST THE CITY OF FRISCO	§ § § § §	BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS
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**KEE-SEVA, LTD., ADC WEST RIDGE VILLAS, L.P. AND CENTER FOR HOUSING
RESOURCES, INC.'S RESPONSES TO CITY OF FRISCO'S SECOND SET OF
REQUESTS FOR INFORMATION AND REQUESTS FOR ADMISSION**

Frisco RFI 155: For the entry dated 5/11/2015 through 6/9/2015 on Exhibit B, please produce all documents that relate to any statement or assertion contained in said entry.

RESPONSE:

Please see documents produced in response to RFI Nos. 11, 12, 14, 15, 118, and 211.

Prepared by/sponsored by: Terri Anderson
Authorized Representative of
ADC West Ridge, L.P. & Center for Housing Resources, Inc.

**SOAH DOCKET NO. 473-16-4619.WS
PUC DOCKET NO. 45870**

FORMAL COMPLAINT OF ADC WEST RIDGE, L.P. AND CENTER FOR HOUSING RESOURCES, INC. AGAINST THE CITY OF FRISCO	§ § § § §	BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS
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**KER-SEVA, LTD., ADC WEST RIDGE VILLAS, L.P. AND CENTER FOR HOUSING
RESOURCES, INC.'S RESPONSES TO CITY OF FRISCO'S SECOND SET OF
REQUESTS FOR INFORMATION AND REQUESTS FOR ADMISSION**

Frisco RFI 157: For the entry dated 6/9/2015 on Exhibit B, please produce all documents that relate to any statement or assertion contained in said entry.

RESPONSE:

Please see documents produced in response to RFI Nos. 11, 12, 14, 15, and 118.

Prepared by/sponsored by: Terri Anderson
Authorized Representative of
ADC West Ridge, L.P. & Center for Housing Resources, Inc.

**SOAH DOCKET NO. 473-16-4619.WS
PUC DOCKET NO. 45870**

FORMAL COMPLAINT OF ADC WEST RIDGE, L.P. AND CENTER FOR HOUSING RESOURCES, INC. AGAINST THE CITY OF FRISCO	§ § § § §	BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS
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**KER-SEVA, LTD., ADC WEST RIDGE VILLAS, L.P. AND CENTER FOR HOUSING
RESOURCES, INC.'S RESPONSES TO CITY OF FRISCO'S SECOND SET OF
REQUESTS FOR INFORMATION AND REQUESTS FOR ADMISSION**

Frisco RFI 159: For the entry dated 7/1/2015 on Exhibit B, please produce all documents that relate to any statement or assertion contained in said entry.

RESPONSE:

Please see documents produced in response to RFI Nos. 11, 12, 14, 15, and 118.

Prepared by/sponsored by: Terri Anderson
Authorized Representative of
ADC West Ridge, L.P. & Center for Housing Resources, Inc.

**SOAH DOCKET NO. 473-16-4619.WS
PUC DOCKET NO. 45870**

FORMAL COMPLAINT OF ADC WEST RIDGE, L.P. AND CENTER FOR HOUSING RESOURCES, INC. AGAINST THE CITY OF FRISCO	§ § § § §	BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS
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**KER-SEVA, LTD., ADC WEST RIDGE VILLAS, L.P. AND CENTER FOR HOUSING
RESOURCES, INC.'S RESPONSES TO CITY OF FRISCO'S SECOND SET OF
REQUESTS FOR INFORMATION AND REQUESTS FOR ADMISSION**

Frisco RFI 161: For the entry dated 11/18/2015 on Exhibit B, please produce all documents that relate to any statement or assertion contained in said entry.

RESPONSE:

Please see documents produced in response to RFI Nos. 11, 12, 14, 15, 118, 137, and 138 and documents enclosed herein and bates labeled ADC02146-02272.

Prepared by/sponsored by: Terri Anderson
Authorized Representative of
ADC West Ridge, L.P. & Center for Housing Resources, Inc.

**SOAH DOCKET NO. 473-16-4619.WS
PUC DOCKET NO. 45870**

FORMAL COMPLAINT OF ADC WEST RIDGE, L.P. AND CENTER FOR HOUSING RESOURCES, INC. AGAINST THE CITY OF FRISCO	§ § § § §	BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS
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**KER-SEVA, LTD., ADC WEST RIDGE VILLAS, L.P. AND CENTER FOR HOUSING
RESOURCES, INC.'S RESPONSES TO CITY OF FRISCO'S SECOND SET OF
REQUESTS FOR INFORMATION AND REQUESTS FOR ADMISSION**

Frisco RFI 163: For the entry dated 12/23/2015 on Exhibit B, please produce all documents that relate to any statement or assertion contained in said entry.

RESPONSE:

Please see documents produced in response to RFI Nos. 11, 12, 14, 15, 118, 137, and 138 and documents bates labeled ADC01703, and documents enclosed herein and bates labeled ADC02146-02272.

Prepared by/sponsored by: Terri Anderson
Authorized Representative of
ADC West Ridge, L.P. & Center for Housing Resources, Inc.

**SOAH DOCKET NO. 473-16-4619.WS
PUC DOCKET NO. 45870**

FORMAL COMPLAINT OF ADC WEST RIDGE, L.P. AND CENTER FOR HOUSING RESOURCES, INC. AGAINST THE CITY OF FRISCO	§ § § § §	BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS
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**KER-SEVA, LTD., ADC WEST RIDGE VILLAS, L.P. AND CENTER FOR HOUSING
RESOURCES, INC.'S RESPONSES TO CITY OF FRISCO'S SECOND SET OF
REQUESTS FOR INFORMATION AND REQUESTS FOR ADMISSION**

Frisco RFI 165: For the entry dated 1/8/2016 on Exhibit B, please produce all documents that relate to any statement or assertion contained in said entry.

RESPONSE:

Please see documents produced in response to RFI Nos. 11, 12, 14, 15, and 118.

Prepared by/sponsored by: Terri Anderson
Authorized Representative of
ADC West Ridge, L.P. & Center for Housing Resources, Inc.

**SOAH DOCKET NO. 473-16-4619.WS
PUC DOCKET NO. 45870**

FORMAL COMPLAINT OF ADC WEST RIDGE, L.P. AND CENTER FOR HOUSING RESOURCES, INC. AGAINST THE CITY OF FRISCO	§ § § § §	BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS
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**KER-SEVA, LTD., ADC WEST RIDGE VILLAS, L.P. AND CENTER FOR HOUSING
RESOURCES, INC.'S RESPONSES TO CITY OF FRISCO'S SECOND SET OF
REQUESTS FOR INFORMATION AND REQUESTS FOR ADMISSION**

Frisco RFI 167: For the entry dated 1/12/2016 on Exhibit B, please produce all documents that relate to any statement or assertion contained in said entry.

RESPONSE:

Please see documents produced in response to RFI Nos. 11, 12, 14, 15, and 118.

Prepared by/sponsored by: Terri Anderson
Authorized Representative of
ADC West Ridge, L.P. & Center for Housing Resources, Inc.

**SOAH DOCKET NO. 473-16-4619.WS
PUC DOCKET NO. 45870**

FORMAL COMPLAINT OF ADC WEST RIDGE, L.P. AND CENTER FOR HOUSING RESOURCES, INC. AGAINST THE CITY OF FRISCO	§ § § § §	BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS
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**KER-SEVA, LTD., ADC WEST RIDGE VILLAS, L.P. AND CENTER FOR HOUSING
RESOURCES, INC.'S RESPONSES TO CITY OF FRISCO'S SECOND SET OF
REQUESTS FOR INFORMATION AND REQUESTS FOR ADMISSION**

Frisco RFI 169: For the entry dated 2/2/2016 on Exhibit B, please produce all documents that relate to any statement or assertion contained in said entry.

RESPONSE:

Please see documents produced in response to RFI Nos. 11, 12, 14, 15, and 118 and documents enclosed herein and bates labeled ADC02085-02093.

Prepared by/sponsored by: Terri Anderson
Authorized Representative of
ADC West Ridge, L.P. & Center for Housing Resources, Inc.

**SOAH DOCKET NO. 473-16-4619.WS
PUC DOCKET NO. 45870**

FORMAL COMPLAINT OF ADC WEST RIDGE, L.P. AND CENTER FOR HOUSING RESOURCES, INC. AGAINST THE CITY OF FRISCO	§ § § § §	BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS
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**KER-SEVA, LTD., ADC WEST RIDGE VILLAS, L.P. AND CENTER FOR HOUSING
RESOURCES, INC.'S RESPONSES TO CITY OF FRISCO'S SECOND SET OF
REQUESTS FOR INFORMATION AND REQUESTS FOR ADMISSION**

Frisco RFI 171: For the entry dated 2/16/2016 on Exhibit B, please produce all documents that relate to any statement or assertion contained in said entry.

RESPONSE:

Please see documents produced in response to RFI Nos. 11, 12, 14, 15, and 118.

Prepared by/sponsored by: Terri Anderson
Authorized Representative of
ADC West Ridge, L.P. & Center for Housing Resources, Inc.

**SOAH DOCKET NO. 473-16-4619.WS
PUC DOCKET NO. 45870**

FORMAL COMPLAINT OF ADC WEST RIDGE, L.P. AND CENTER FOR HOUSING RESOURCES, INC. AGAINST THE CITY OF FRISCO	§ § § § §	BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS
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**KER-SEVA, LTD., ADC WEST RIDGE VILLAS, L.P. AND CENTER FOR HOUSING
RESOURCES, INC.'S RESPONSES TO CITY OF FRISCO'S SECOND SET OF
REQUESTS FOR INFORMATION AND REQUESTS FOR ADMISSION**

Frisco RFI 173: For the entry dated 6/10/2016 on Exhibit B, please produce all documents that relate to any statement or assertion contained in said entry.

RESPONSE:

Please see documents produced in response to RFI Nos. 11, 12, 14, 15, and 118 and documents enclosed herein and bates labeled ADC02282-02292 and ADC02319-2320.

Prepared by/sponsored by: Terri Anderson
Authorized Representative of
ADC West Ridge, L.P. & Center for Housing Resources, Inc.

**SOAH DOCKET NO. 473-16-4619.WS
PUC DOCKET NO. 45870**

FORMAL COMPLAINT OF ADC WEST RIDGE, L.P. AND CENTER FOR HOUSING RESOURCES, INC. AGAINST THE CITY OF FRISCO	§ § § § §	BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS
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**KER-SEVA, LTD., ADC WEST RIDGE VILLAS, L.P. AND CENTER FOR HOUSING
RESOURCES, INC.'S RESPONSES TO CITY OF FRISCO'S SECOND SET OF
REQUESTS FOR INFORMATION AND REQUESTS FOR ADMISSION**

Frisco RFI 175: For the entry dated 6/20/2016 on Exhibit B, please produce all documents that relate to any statement or assertion contained in said entry.

RESPONSE:

Please see documents produced in response to RFI Nos. 11, 12, 14, 15, and 118 and documents enclosed herein and bates labeled ADC02273-02281, ADC02306-02307, and ADC02315-02318.

Prepared by/sponsored by: Terri Anderson
Authorized Representative of
ADC West Ridge, L.P. & Center for Housing Resources, Inc.

**SOAH DOCKET NO. 473-16-4619.WS
PUC DOCKET NO. 45870**

FORMAL COMPLAINT OF ADC WEST RIDGE, L.P. AND CENTER FOR HOUSING RESOURCES, INC. AGAINST THE CITY OF FRISCO	§ § § § §	BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS
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**KER-SEVA, LTD., ADC WEST RIDGE VILLAS, L.P. AND CENTER FOR HOUSING
RESOURCES, INC.'S RESPONSES TO CITY OF FRISCO'S SECOND SET OF
REQUESTS FOR INFORMATION AND REQUESTS FOR ADMISSION**

Frisco RFI 177: For the entry dated 6/21/2016 on Exhibit B, please produce all documents that relate to any statement or assertion contained in said entry.

RESPONSE:

Please see documents produced in response to RFI Nos. 11, 12, 14, 15, and 118 and documents enclosed herein and bates labeled ADC02273-02281, ADC02306-02307, and ADC02315-02318.

Prepared by/sponsored by: Terri Anderson
Authorized Representative of
ADC West Ridge, L.P. & Center for Housing Resources, Inc.

**SOAH DOCKET NO. 473-16-4619.WS
PUC DOCKET NO. 45870**

FORMAL COMPLAINT OF ADC WEST RIDGE, L.P. AND CENTER FOR HOUSING RESOURCES, INC. AGAINST THE CITY OF FRISCO	§ § § § §	BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS
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**KER-SEVA, LTD., ADC WEST RIDGE VILLAS, L.P. AND CENTER FOR HOUSING
RESOURCES, INC.'S RESPONSES TO CITY OF FRISCO'S SECOND SET OF
REQUESTS FOR INFORMATION AND REQUESTS FOR ADMISSION**

Frisco RFI 179: For the entry dated 6/23/2016 on Exhibit B, please produce all documents that relate to any statement or assertion contained in said entry.

RESPONSE:

Please see documents produced in response to RFI Nos. 11, 12, 14, 15, and 118 and documents enclosed herein and bates labeled ADC02273-02281, ADC02306-02307, and ADC02315-02318.

Prepared by/sponsored by: Terri Anderson
Authorized Representative of
ADC West Ridge, L.P. & Center for Housing Resources, Inc.

**SOAH DOCKET NO. 473-16-4619.WS
PUC DOCKET NO. 45870**

FORMAL COMPLAINT OF ADC WEST RIDGE, L.P. AND CENTER FOR HOUSING RESOURCES, INC. AGAINST THE CITY OF FRISCO	§ § § § §	BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS
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**KER-SEVA, LTD., ADC WEST RIDGE VILLAS, L.P. AND CENTER FOR HOUSING
RESOURCES, INC.'S RESPONSES TO CITY OF FRISCO'S SECOND SET OF
REQUESTS FOR INFORMATION AND REQUESTS FOR ADMISSION**

Frisco RFI 181: For the entries dated 6/24/2016 on Exhibit B, please produce all documents that relate to any statement or assertion contained in said entry.

RESPONSE:

Please see documents produced in response to RFI Nos. 11, 12, 14, 15, and 118 and documents enclosed herein and bates labeled ADC02273-02281, ADC02306-02307, and ADC02315-02318.

Prepared by/sponsored by: Terri Anderson
Authorized Representative of
ADC West Ridge, L.P. & Center for Housing Resources, Inc.

**SOAH DOCKET NO. 473-16-4619.WS
PUC DOCKET NO. 45870**

FORMAL COMPLAINT OF ADC WEST RIDGE, L.P. AND CENTER FOR HOUSING RESOURCES, INC. AGAINST THE CITY OF FRISCO	§ § § § §	BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS
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**KER-SEVA, LTD., ADC WEST RIDGE VILLAS, L.P. AND CENTER FOR HOUSING
RESOURCES, INC.'S RESPONSES TO CITY OF FRISCO'S SECOND SET OF
REQUESTS FOR INFORMATION AND REQUESTS FOR ADMISSION**

Frisco RFI 183: For the entries dated 6/28/2016 on Exhibit B, please produce all documents that relate to any statement or assertion contained in said entry.

RESPONSE:

Please see documents produced in response to RFI Nos. 11, 12, 14, 15, and 118 and documents enclosed herein and bates labeled ADC02273-02281, ADC02306-02307, and ADC02315-02318.

Prepared by/sponsored by: Terri Anderson
 Authorized Representative of
 ADC West Ridge, L.P. & Center for Housing Resources, Inc.

**SOAH DOCKET NO. 473-16-4619.WS
PUC DOCKET NO. 45870**

FORMAL COMPLAINT OF ADC WEST RIDGE, L.P. AND CENTER FOR HOUSING RESOURCES, INC. AGAINST THE CITY OF FRISCO	§ § § § §	BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS
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**KER-SEVA, LTD., ADC WEST RIDGE VILLAS, L.P. AND CENTER FOR HOUSING
RESOURCES, INC.'S RESPONSES TO CITY OF FRISCO'S SECOND SET OF
REQUESTS FOR INFORMATION AND REQUESTS FOR ADMISSION**

Frisco RFI 185: For the entry dated 8/31/2016 on Exhibit B, please produce all documents that relate to any statement or assertion contained in said entry.

RESPONSE:

Please see documents produced in response to RFI Nos. 11, 12, 14, 15, and 18.

Prepared by/sponsored by: Terri Anderson
Authorized Representative of
ADC West Ridge, L.P. & Center for Housing Resources, Inc.

**SOAH DOCKET NO. 473-16-4619.WS
PUC DOCKET NO. 45870**

FORMAL COMPLAINT OF ADC WEST RIDGE, L.P. AND CENTER FOR HOUSING RESOURCES, INC. AGAINST THE CITY OF FRISCO	§ § § § §	BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS
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**KER-SEVA, LTD., ADC WEST RIDGE VILLAS, L.P. AND CENTER FOR HOUSING
RESOURCES, INC.'S RESPONSES TO CITY OF FRISCO'S SECOND SET OF
REQUESTS FOR INFORMATION AND REQUESTS FOR ADMISSION**

Frisco RFI 187: For the entry dated 9/14/2016 on Exhibit B, please produce all documents that relate to any statement or assertion contained in said entry.

RESPONSE:

Please see documents produced in response to RFI.Nos. 11, 12, 14, 15, 118, and 120 and documents enclosed herein and bates labeled ADC02308-02309 and ADC02364-02365.

Prepared by/sponsored by: Terri Anderson
Authorized Representative of
ADC West Ridge, L.P. & Center for Housing Resources, Inc.

SOAH DOCKET NO. 473-16-4619.WS
PUC DOCKET NO. 45870

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

**KER-SEVA, LTD., ADC WEST RIDGE VILLAS, L.P. AND CENTER FOR HOUSING
RESOURCES, INC.'S RESPONSES TO CITY OF FRISCO'S SECOND SET OF
REQUESTS FOR INFORMATION AND REQUESTS FOR ADMISSION**

Frisco RFI 189: For the entry dated 10/6/2016 on Exhibit B, please produce all documents that relate to any statement or assertion contained in said entry.

RESPONSE:

Please see documents produced in response to RFI Nos. 11, 12, 14, 15, 118, 119, and 120.

Prepared by/sponsored by: Terri Anderson
Authorized Representative of
ADC West Ridge, L.P. & Center for Housing Resources, Inc.

**SOAH DOCKET NO. 473-16-4619.WS
PUC DOCKET NO. 45870**

FORMAL COMPLAINT OF ADC WEST RIDGE, L.P. AND CENTER FOR HOUSING RESOURCES, INC. AGAINST THE CITY OF FRISCO	§ § § § §	BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS
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**KER-SEVA, LTD., ADC WEST RIDGE VILLAS, L.P. AND CENTER FOR HOUSING
RESOURCES, INC.'S RESPONSES TO CITY OF FRISCO'S SECOND SET OF
REQUESTS FOR INFORMATION AND REQUESTS FOR ADMISSION**

Frisco RFI 191: For the entry dated 6/26/2007 on Exhibit B, please produce all documents that relate to any statement or assertion contained in said entry.

RESPONSE:

Please see documents produced in response to RFI Nos. 11, 12, 14, 15, and 118.

Prepared by/sponsored by: Terri Anderson
Authorized Representative of
ADC West Ridge, L.P. & Center for Housing Resources, Inc.

**SOAH DOCKET NO. 473-16-4619.WS
PUC DOCKET NO. 45870**

FORMAL COMPLAINT OF ADC WEST RIDGE, L.P. AND CENTER FOR HOUSING RESOURCES, INC. AGAINST THE CITY OF FRISCO,	§ § § § §	BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS
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**KER-SEVA, LTD., ADC WEST RIDGE VILLAS, L.P. AND CENTER FOR HOUSING
RESOURCES, INC.'S RESPONSES TO CITY OF FRISCO'S SECOND SET OF
REQUESTS FOR INFORMATION AND REQUESTS FOR ADMISSION**

Frisco RFI 193: For the entry dated 11/7/2001 on Exhibit B, please produce all documents that relate to any statement or assertion contained in said entry.

RESPONSE:

Please see documents produced in response to RFI Nos. 11, 12, 14, 15, and 118.

Prepared by/sponsored by: Terri Anderson
Authorized Representative of
ADC West Ridge, L.P. & Center for Housing Resources, Inc.

**SOAH DOCKET NO. 473-16-4619.WS
PUC DOCKET NO. 45870**

FORMAL COMPLAINT OF ADC WEST RIDGE, L.P. AND CENTER FOR HOUSING RESOURCES, INC. AGAINST THE CITY OF FRISCO	§ § § § §	BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS
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**KER-SEVA, LTD., ADC WEST RIDGE VILLAS, L.P. AND CENTER FOR HOUSING
RESOURCES, INC.'S RESPONSES TO CITY OF FRISCO'S SECOND SET OF
REQUESTS FOR INFORMATION AND REQUESTS FOR ADMISSION**

Frisco RFA 8: Admit that the Annexation Agreement identified as Exhibit C is expired.

RESPONSE:

Admit that the term set forth in paragraph 8 of the Annexation Agreement identified as Exhibit C is a 5-year term from the effective date of the agreement.

Prepared/Sponsored by: Terri Anderson
Authorized Representative of ADC West Ridge, L.P.
and Center for Housing Resources, Inc.

**SOAH DOCKET NO. 473-16-4619.WS
PUC DOCKET NO. 45870**

FORMAL COMPLAINT OF ADC WEST RIDGE, L.P. AND CENTER FOR HOUSING RESOURCES, INC. AGAINST THE CITY OF FRISCO	§ § § § §	BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS
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**ADC WEST RIDGE VILLAS, L.P. AND CENTER FOR
HOUSING RESOURCES, INC.'S DOCUMENT PRODUCTION LOG**

Frisco RFI #	Responsive Bates Numbers
1	ADC00001-00044
2, 3	ADC00045-00049
4, 7	ADC00050-00081
5, 8 6, 9	ADC00082-00087
10, 13	ADC00088-00275
11, 12, 14, 15	ADC00276-01022 ADC01100-01136 ADC01148-01289
52-54, 58-60, 64-66, 70-72, 76-78, 82-84	ADC00050-00081 ADC00082-00087 ADC00088-00275 ADC00276-01022 ADC01023-01097 ADC01137-01138
55-57, 61-63, 67-69, 73-75, 79-81, 85-87	ADC00088-00121 ADC01047-01069 ADC01070-01092
94	ADC00088-00121 ADC01098-01099
97-99	ADC00001-00044 ADC00045-00049 ADC01070-01092

101	ADC01047-01069 ADC00001-00044
106, 108, 109, 110	ADC1441-01460
106, 107, 109, 110, 121-193, 195, 196, 200, 201, 203, 207	ADC02059-02068
215, 227, 234	ADC02069-02073
118	ADC001461-01674
119	ADC01431-01439
120	ADC01675-1682
121	ADC01440 ADC01683
120, 121, 187, 217, 218, 227, 234	ADC02308-02309 ADC02364-02365
123, 129, 197, 198, 212, 239	ADC02074
135, 136	ADC01684-01685
137, 138	ADC01686-01702
163, 164	ADC01703
196, 239	ADC01704-01718 ADC02075-02084
169, 196, 213, 222, 239	ADC02085-02093
196, 227, 234, 239	ADC02094
197, 198	ADC01719-01733
206	ADC02095
208	ADC02096-02103
143, 149, 196, 209, 239	ADC02104-02118
209, 106, 107, 109, 110, 239	ADC02119-02123
143, 149, 151, 153, 196, 209, 220, 221, 222, 239	ADC02124-02136
141, 196, 210, 239	ADC02137-02143
141, 143, 196, 210, 220, 222, 239	ADC02144-02145
211	ADC01734-01740
161, 163, 212, 219	ADC02146-02272
213	ADC01741-01745

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175, 177, 179, 181, 183, 196, 213, 221, 225, 227, 229, 233, 234, 239	ADC02276-02279
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173, 196, 213, 223, 225, 239	ADC02282-02292
196, 213, 225, 227, 234	ADC02293-02294
196, 213, 227, 234	ADC02295-02301
196, 213, 227, 234, 239	ADC02302-02305
175, 177, 179, 181, 183, 196, 216, 225, 227, 229, 234, 239	ADC02306-02307
187, 196, 217, 218, 227, 234, 239	ADC02308-02309
218	ADC01746-01749
196, 218, 219, 227, 234, 239	ADC02310-02312
196, 218, 227, 234, 239	ADC02313-02314
219	ADC01750-01756
175, 177, 179, 181, 183, 196, 224, 226, 227, 229, 234, 239	ADC02315-02316
175, 177, 179, 181, 183, 196, 224, 226, 227, 234, 239	ADC02317-02318
173, 196, 225, 227, 234, 239	ADC02319-02320
227, 234	ADC02321-02330
227, 229, 234	ADC02331-02340
234	ADC01757-01760
123, 125, 127, 133, 195, 196, 201, 207, 213, 239	ADC01932-02058
Rule 194.2 and Order No. 3	Responsive Bates Numbers
	ADC01139-01147 ADC01290-01430 ADC01761-01831 ADC01866-01931 ADC02341-02363
PUC Staffs' RFIs	
1-5	ADC00050-00087

	ADC00276-00292 ADC00428 ADC01832-01865
1-6	ADC00050-00087 ADC00276-00306 ADC00408-00434 ADC00437-00439 ADC01832-01865

KER-SEVA, ET AL
PRIVILEGED DOCUMENTS

DATE	TYPE	TITLE	DESCRIPTION	TO	FROM	CC	PRIVILEGE	REQUEST NO.
04/02/2015	Email	Westridge Addition Preliminary Plat: PP15-0008	Letter to Frisco	T. Anderson J. Hake, M. Dornic, J. Cross, B. Robinson, F. Pollacia	T. Anderson J. Hake	M. Dornic, J. Cross, B. Robinson, F. Pollacia	Attorney-Client Privilege (Partial redaction)	Frisco 209, 220
04/15/2015	Email	Westridge Addition Preliminary Plat PP15-0008	Letter to Frisco	J. Hake, M. Dornic, J. Cross, B. Robinson, F. Pollacia	T. Anderson		Attorney-Client Privilege (Partial redaction)	Frisco 209
02/05/2016	Emails	Building Permit	Construction permit emails	T. Anderson F. Pollacia L. Wild T. Scott K. Webster	F. Pollacia T. Anderson		Attorney-Client Privilege (Partial redaction).	Frisco 212
02/09/2016	Emails	Building Permit		C. Palmer T. Anderson F. Pollacia T. Jackson	F. Pollacia T. Anderson C. Palmer		Attorney-Client Privilege (Partial redaction)	Frisco 212
02/10/2016	Emails	Building Permit		C. Palmer T. Anderson F. Pollacia T. Jackson	F. Pollacia T. Anderson C. Palmer		Attorney-Client Privilege (Partial redaction)	Frisco 212
02/18/2016	Emails	West Ridge Building Permit		C. Palmer T. Anderson F. Pollacia	F. Pollacia T. Anderson C. Palmer	T. Jackson	Attorney-Client Privilege (Partial redaction)	Frisco 212

DATE	TYPE	TITLE	DESCRIPTION	TO	FROM	CC	PRIVILEGE	REQUEST NO.
02/19/2016	Emails	West Ridge Building Permit		C. Palmer T. Anderson F. Pollacia	F. Pollacia T. Anderson C. Palmer	T. Jackson	Attorney-Client Privilege (Partial redaction)	Frisco 212
06/21/2016	Email	WRV Frisco	Service of project	G. Lacefield L. Renner	T. Anderson	R. Blakeley I. Suster D. Ochoa Louella J.	Attorney-Client Privilege (Partial redaction)	Frisco 213, 223, 225
08/09/2016	Email	Development next to Daycare	Providing Montessori School plans west of property	Mallory Beck	Randall Chrisman		Attorney-Client Privilege (Partial redaction)	Frisco 10 & 13
08/09/2016	Emails	Westridge Boulevard Tract	Effective Date of inspection period and closing date	Mallory Beck	Randall Chrisman,		Attorney-Client Privilege (Partial redaction)	Frisco 10 & 13
08/09/2016	Emails	Westridge ETJ Development	Emails with John Webb, City of Frisco about ETJ development	Beck	Randall Chrisman,		Attorney-Client Privilege (Partial redaction)	Frisco 10 & 13
08/09/2016	Emails	Frisco ETJ	Collin Co. Eng. Dept.	Beck	Randall Chrisman		Attorney-Client Privilege (Partial redaction)	Frisco 10 & 13
08/09/2016	Emails	Development Question	Development of Neighboring Property	Beck,	Randall Chrisman		Attorney-Client Privilege (Partial redaction)	Frisco 10 & 13
08/17/2016	Email	Frisco Winding Creek	Response to letter re: Frisco Winding Creek	Dougal, Beck, Jim Bradbury, Courtney Cox	Anderson		Attorney-Client Privilege (Partial redaction)	Frisco 11, 12, 14, and 15

DATE	TYPE	TITLE	DESCRIPTION	TO	FROM	CC	PRIVILEGE	REQUEST NO.
9/9/2016	Email	Westridge Easement Dispute	ROW permit	Clair Palmer, Toni Jackson, Terri Anderson	Frank Pollacia		Attorney-Client Privilege (Partial Redaction)	Frisco RFI 213
09/16/2016	Email	City of Frisco ROW	Frisco Plat with ROW and utility easements highlighted	Claire Palmer, Ann Lott, Toni Jackson, Bradbury, Levi Wild, Frank Pollacia, Beck, Ali Abazari, Myron Dornic, Cox	Anderson		Attorney-Client Privilege (Partial redaction)	Frisco 11, 12, 14, and 15
09/16/2016	Email	Stowe CV and Testifying Resume	Email sending J. Stowe CV and testifying resume	M. Beck L. Dougal D. Willis	A. Abazari		Attorney-Client Privilege (Partial redaction)	RFD
09/16/2016	Email	Storm sewer	Storm sewer installation	Palmer, Lott, Jackson, Bradbury, Wild, Follacia, Beck, Abazari, Dornic, Cox, Rita Everett	Anderson		Attorney-Client Privilege (Partial redaction)	Frisco 11, 12, 14, and 15
10/05/2016	Email	Storm Drain	Collin County	Bradbury, Cox, Abazari, Beck, Dornic	T. Anderson	Palmer, Jackson	Attorney-Client Privilege (Partial redaction)	Frisco 11, 12, 14, and 15

DATE	TYPE	TITLE	DESCRIPTION	TO	FROM	CC	PRIVILEGE	REQUEST NO.
09/09/2016	Email	Fwd: Westridge easement dispute with City of Frisco	Comments from architect	M. Beck A. Abazari	T. Anderson		Attorney-Client Privilege (Withheld; attachment produced)	Frisco 213
09/12/2016	Email	Letter to Frisco re: easements	Email re: civil construction plans; draft letter to Frisco	M. Beck T. Anderson	T. Anderson M. Beck		Attorney-Client Privilege (Withheld)	Frisco 106, 107, 109, 110
09/12/2016	Email	Letter to Frisco re: easements	Email re: civil construction plans; draft letter to Frisco	M. Beck	T. Anderson		Attorney-Client Privilege (Withheld)	Frisco 106, 107, 109, 110
09/12/2016	Email	Letter to Frisco re: easements	Email re: draft letter to Frisco	M. Beck T. Anderson	T. Anderson M. Beck		Attorney-Client Privilege (Withheld)	Frisco 106, 107, 109, 110
09/12/2016	Email	Letter to Frisco re: easements	Email re: civil construction plans; Draft letter to Frisco	M. Beck T. Anderson	T. Anderson M. Beck		Attorney-Client Privilege (Withheld)	Frisco 106, 107, 109, 110
09/15/2016	Email	Westridge	Audio recording of meeting	L. Dougal M. Beck J. Bradbury C. Cox	T. Anderson		Attorney-Client Privilege (Partial Redaction; attachment produced)	Frisco 121

DATE	TYPE	TITLE	DESCRIPTION	TO	FROM	CC	PRIVILEGE	REQUEST NO.
09/20/2016	Email	West Ridge Villas – Affidavit – Luis Gonzalez	Email forwarding affidavit by Gonzalez of City of Frisco ROW inspector	M. Beck A. Abazari M. Dornic J. Bradbury C. Cox T. Jackson C. Palmer A. Lott	T. Anderson		Attorney-Client Privilege (Partial Redaction; attachment produced)	Frisco 218
10/06/2016	Email	Building Permit	Forwarding document	J. Bradbury C. Cox	T. Anderson	M. Dornic A. Abazari M. Beck	Attorney-Client Privilege	Frisco 214
10/06/2016	Email	Building Permit	Fire marshal requirements in permit	J. Bradbury C. Cox	T. Anderson	M. Dornic A. Abazari M. Beck	Attorney-Client Privilege	Frisco 214
10/11/2016	Email	Police Visits at West Ridge	Email forward Stan Fulks letter	M. Dornic M. Beck Ann Loft A. Abazari J. Bradbury C. Cox C. Palmer T. Jackson	T. Anderson		Attorney-Client Privilege (Partial Redaction)	Frisco 120
10/20/2016	Email	Frisco's June 8 Utility Meeting – West Ridge villas	Stan Fulks meeting with Frisco Eng. Dept.	A. Abazari M. Beck M. Dornic J. Bradbury C. Cox	T. Anderson		Attorney-Client Privilege (Partial Redaction)	Frisco 234
10/20/2016	Email	Frisco's June 8 Utility Meeting – West Ridge villas	Stan Fulks meeting with Frisco Eng. Dept.	A. Abazari M. Beck M. Dornic J. Bradbury C. Cox	T. Anderson		Attorney-Client Privilege (Partial Redaction)	Frisco 234

**PUC DOCKET NO. 45870
SOAH DOCKET
NO. 473-16-4619.WS**



**ADC Supplemental Responses to
2nd, 3rd and 4th Set of RFIs,
Supplemental RFD
(Bates label ADC01866-02365)
01/09/2017**

Austin • Dallas • Fort Worth • Houston • San Angelo • San Antonio • Texarkana