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Item Number: 125

Addendum StartPage: 0

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

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BEFORE THE STATE OFFICE
PUBLIC UTILITY COMMISSION
FILING CLERK
OF

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

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ADMINISTRATIVE HEARINGS

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

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

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

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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 2016:

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

Via email and U.S. First Class Mail

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Via email and U.S. First Class Mail

/s/ Mallory Beck
Mallory Beck

**SOAH DOCKET NO. 473-16-4619.WS
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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 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 FOURTH SET OF REQUESTS FOR INFORMATION**

Frisco RFI 239. Please provide all contracts, agreements, emails, letters or memorandum of understandings, communications, and other commitments between you and any other party for construction, development, permitting, designing, or any other activity on Lot 2.

RESPONSE:

Subject to the ruling in SOAH Order No. 7, Complainants respond: Please see documents produced bates labeled ADC000082-00087, ADC00276-01138, ADC01290-01430, ADC01441-01682, ADC01684-01685, ADC01704-01718, ADC01746-01749, ADC01757-01760, ADC01870-01930, and documents enclosed herein bates labeled ADC01932-02058, ADC02075-02094, ADC02104-2145, ADC02273-02292, ADC02302-02320, and documents produced in response to Order No. 3 and enclosed herein and bates labeled ADC02351-02363.

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

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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 FOURTH SET OF REQUESTS FOR INFORMATION**

Frisco RFI 240: Please list all contractors, experts, or other individual or entity with whom you have communicated regarding the construction, development, permitting, designing, or any other activity on Lot 2.

RESPONSE:

Subject to the ruling in SOAH Order No. 7, Complainants respond: KWA Construction, LLC; Architectural; Sanchez & Associates, LLC; Randal Chrisman; Jastinder Jawanda; the City of Frisco; the City of McKinney; Cross Engineering Consultants; and various attorneys.

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

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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

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 RF1 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 Lott 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

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

175, 177, 179, 181, 183, 196, 213, 216, 226, 227, 229, 234, 239	ADC02273-02275
175, 177, 179, 181, 183, 196, 213, 221, 225, 227, 229, 233, 234, 239	ADC02276-02279
175, 177, 179, 181, 183, 196, 213, 221, 227, 229, 233, 234, 239	ADC02280-02281
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

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

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