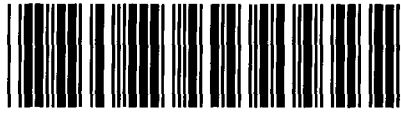


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FORMAL COMPLAINT OF
ADC WEST RIDGE L.P. AND
CENTER FOR HOUSING RESOURCES,
INC. AGAINST THE CITY OF FRISCO

§
§
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§

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

AGREED MOTION FOR CONTINUANCE

COMES NOW, ADC West Ridge, LP and the Center for Housing Resources, Inc. (collectively “Complainants”), the City of Frisco (“City” or “Frisco”) and the Commission Staff (“Staff”) of the Public Utility Commission of Texas (“PUC”) and files this Agreed Motion for Continuance (“Motion”). In support thereof, the City shows the following:

I. BACKGROUND

On January 9, 2017, Complainants requested a 60-day continuance in the proceedings. The parties worked toward an agreement regarding Complainants’ Motion for Continuance.

II. AGREEMENT

The parties agree to a continuance as follows:

1. The parties agree to an approximately 60-day continuance of all pending deadlines contained in Order No. 3 to March 13, 2017.
2. The parties agree that immediately there shall be a 30-day abatement of discovery in this matter. However, all pending responses due to Staff’s outstanding RFI requests will be due without abatement, unless otherwise agreed to by the parties.
3. For the last 30 days of the above referenced continuance, the first five business days after the end of the 30-day discovery abatement period, the parties may continue with any discovery requests pursuant to the rules, including depositions. For the remaining days until the filing of Complainants’ pre-filed evidence, written discovery will be limited to matters relating to the proposed annexation referenced in Complainants’ Motion for Continuance.
4. All pending depositions will be re-scheduled (including the deposition of Mr. Jack Stowe recessed from January 9, 2017).
5. The parties will work to provide a new procedural schedule with proposed new deadlines and hearing dates within the next two weeks.

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III. CONCLUSION AND PRAYER

The parties respectfully request an order granting the Complainants' Motion to for Continuance with the agreed provisions explained above.

Respectfully submitted,

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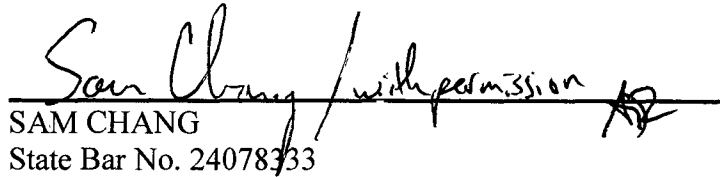
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CERTIFICATE OF SERVICE

I hereby certify that on this 12th day of January, 2017, 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:

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