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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 STAFF OFFICE OF
FEB 21 AM 11:19
PUBLIC UTILITY COMMISSION
FILING CLERK
ADMINISTRATIVE HEARINGS

**AGREED MOTION FOR CONTINUANCE AND
STATUS REPORT PURSUANT TO ORDER NO. 11**

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") and Status Report Pursuant to Order No. 11. In support thereof, the Parties show the following:

I. BACKGROUND

Order No. 10 granted a 60-day continuance in this case. Complainants have requested an additional continuance of the Parties. The Parties have agreed on an additional 45-day continuance of the case under the same terms as before.

II. AGREEMENT

The parties agree to a continuance as follows:

1. The parties agree to an additional 45-day continuance of all pending deadlines contained in Order No. 3 to April 28, 2017.
2. The parties agree that there shall be an additional 30-day abatement of discovery in this matter.
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 of the Subject Property by the City.
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 three weeks.

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III. CONCLUSION AND PRAYER

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

Respectfully submitted,

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A handwritten signature in black ink, appearing to read 'Ali Abazari', is written over a horizontal line.

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**ATTORNEYS FOR COMPLAINANTS
ADC WESTRIDGE LP AND CENTER FOR
HOUSING RESOURCES, INC.**