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PUC PUBLIC UTILITY COMMISSION
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COMPLAINT OF KER-SEVA LTD.
AGAINST THE CITY OF FRISCO

§
§

BEFORE THE STATE OFFICE OF
ADMINISTRATIVE HEARINGS

CITY OF FRISCO'S RESPONSE TO COMPLAINANTS' MOTION TO COMPEL

COMES NOW the City of Frisco ("City") and files this Response to the Motion to Compel by Ker-Seva Ltd., ADC West Ridge Villas, LP and Center for Housing Resources, Inc. In support thereof, the City shows the following:

I. BACKGROUND

On April 19, 2016, Ker-Seva Ltd. filed a complaint ("Complaint") against the City pursuant to PUC Proc. R. 22.242. The City believes the Public Utility Commission of Texas ("PUC") lacks jurisdiction over the Complaint.

On June 30, 2016, Ker-Seva Ltd., ADC West Ridge Villas, LP and Center for Housing Resources, Inc. ("Complainants") jointly served Requests for Information and Requests for Admissions ("Discovery") on the City. The City and Complainants worked to modify some discovery requests and limit the scope of others. However, the City still asserted that the scope of the hearing had yet to be determined making the Discovery irrelevant. On July 11, 2016, the City filed objections to the Discovery. On July 15, 2016, Complainants filed a Motion to Compel. On July 20, 2016, the PUC issued its Preliminary Order in this matter. Pursuant to PUC Proc. R. 22.144, this response is timely filed.

II. RESPONSE

At the time the City filed the objections, the Preliminary Order in this case had not been issued. The issues in the proceeding were unclear. On July 20, 2016, the City received the PUC's Preliminary Order which indicated the scope of the issues to be investigated. Without conceding that the discovery responses are irrelevant or unduly burdensome, the City will produce responses

to the Discovery, as amended by the parties. The City will produce the discovery within 20 days, or August 11, 2016.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on this 22nd day of July, 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:

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