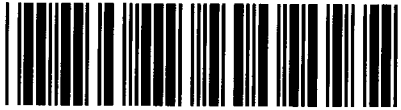




Control Number: 45870



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Addendum StartPage: 0

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

RECEIVED

COMPLAINT OF KER-SEVA LTD.
AGAINST THE CITY OF FRISCO

§
§

BEFORE THE STATE OFFICE OF
ADMINISTRATIVE HEARINGS
2016 JUL 22 AM 11:32
FILING CLERK

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

COMES NOW the City of Frisco ("City") and files this Response to the Motion to Intervene by 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. 22.242.¹ 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. jointly served Requests for Information and Requests for Admissions on the City.² On July 15, 2016, ADC West Ridge Villas, LP and Center for Housing Resources, Inc. filed a Motion to Intervene. Pursuant to PUC Proc. R. 22.78(a), this response is timely filed.

II. RESPONSE

ADC West Ridge Villas, LP and Center for Housing Resources, Inc. assert that the property that is the subject of this complaint has been purchased by ADC West Ridge Villas, LP. Further, Center for Housing Resources, Inc. is the sole member and manager of ADC West Ridge Villas, LP's general partner. The City requests production of evidence that ADC West Ridge Villas, LP

¹ The City incorporates the filings in this proceeding by reference to their corresponding PUC Filing Control and/or Item Numbers (e.g., "Item No. 1"). See Tex. R. Civ. P. 58. Unless otherwise noted, all docket references herein are to PUC Docket No. 45870, In Re Complaint of Ker Seva, Ltd. against the City of Frisco.

² See Item No. 12.

purchased the subject property. With such evidence, the City does not oppose the Motion to Intervene by ADC West Ridge Villas, LP and Center for Housing Resources, Inc.

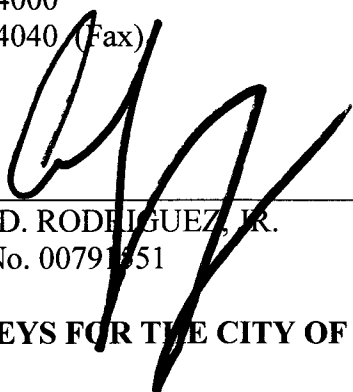
Respectfully submitted,

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ATTORNEYS FOR THE CITY OF FRISCO

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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