



Control Number: 45870



Item Number: 68

Addendum StartPage: 0

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

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FORMAL COMPLAINT OF KER-SEVA LTD., ADC WEST RIDGE VILLAS, L.P., AND CENTER FOR HOUSING RESOURCES, INC. AGAINST THE CITY OF FRISCO, TEXAS	§ § § § §	BEFORE THE STATE OFFICE PUBLIC UTILITY COMMISSION FILING CLERK OF ADMINISTRATIVE HEARINGS
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**NOTICE OF ORAL DEPOSITION OF JOHN LETTELLEIR
AND SUBPOENA DUCES TECUM**

TO: John Lettelleir, by and through the City of Frisco, Texas, and its attorney of record, Art Rodriguez, Russell & Rodriguez, L.L.P., 1633 Williams Dr., Bldg. 2, Suite 200, Georgetown, Texas 78268

PLEASE TAKE NOTE THAT, Complainants Ker-Seva Ltd., ADC West Ridge, L.P., and Center for Housing Resources, Inc. (collectively, "Complainants"), by and through their attorney, intend to take the oral deposition of John Lettelleir on November 29, 2016, at 10:30 a.m. at the law offices of Abernathy, Roeder, Boyd & Hullett, P.C. at 1700 Redbud Blvd., Suite 300, McKinney, Texas 75069 pursuant to PUC Procedural Rule 22.143, 16 Tex. Admin. Code § 22.143. The deposition will be taken before a court reporter and shall continue from day-to-day until completed. The deposition and any documents produced at or prior to such deposition may be used as evidence at the hearing on the merits. Please be advised that Ms. Terri Anderson, Mr. Jack Stowe, Mr. Levi Wild, or any expert witness of Complainants with knowledge related to the area of your testimony may attend this deposition.

John Lettelleir is further commanded to produce at said time and place set forth above, the following books, records, papers, documents, or other tangible things:

- a. All documents reviewed by John Lettelleir in anticipation of his testimony.
- b. All documents provided to, reviewed by, or prepared by or for John Lettelleir when responding on behalf of the City of Frisco to any requests, submittals, or communications with Terri Anderson or anyone working on behalf of Terri

Anderson, including Cross Engineers, related to the development of the property at 9331 Westridge Boulevard.

- c. City of Frisco Water Master Plans for 2008-2016.
- d. City of Frisco Sewer Master Plans for 2008-2016.
- e. To the extent not already produced in written discovery, all written communications between John Lettelleir and any employee, agent, or representative of the City of Frisco relating to this proceeding. To the extent attorney-client privileged communications are responsive to this request, please provide a log in compliance with the PUC Rules and the Texas Rules of Civil Procedure.
- f. To the extent not already produced in written discovery, all written communications between John Lettelleir and any employee, agent, or representative of the City of Frisco relating to extension of water and sewer services to the property at 9331 Westridge Blvd. To the extent attorney-client privileged communications are responsive to this request, please provide a log in compliance with the PUC Rules and the Texas Rules of Civil Procedure

This notice and subpoena duces tecum was issued upon agreement of the parties, and the parties have waived the requirement of the issuance of a commission. This notice, as mailed to John Lettelleir through Art Rodriguez, shall also serve as a subpoena as authorized by Rule 176 of the Texas Rules of Civil Procedure.

Respectfully submitted,

JACKSON WALKER L.L.P.

By: /s/ Mallory Beck

Leonard Dougal - State Bar No. 06031400

Ali Abazari - State Bar No. 00796094

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ATTORNEYS FOR COMPLAINANTS
KER-SEVA, LTD., 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 November 2016:

Art Rodriguez
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Via email

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Via email

/s/ Mallory Beck
Mallory Beck