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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
PUBLIC UTILITY COMMISSION
FILING CLERK
PUBLIC UTILITY COMMISSION
OF TEXAS

NOTICE OF ORAL DEPOSITION OF
DR. VICTORIA HARKINS AND SUBPOENA DUCES TECUM

TO: Dr. Victoria Harkins, 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 Villas, L.P., and Center for Housing Resources, Inc. (collectively, "Complainants"), by and through their attorney, intend to take the oral deposition of Dr. Victoria Harkins on December 13, 2016, at 10:00 a.m. at the law offices of Russell & Rodriguez, L.L.P., 1633 Williams Dr., Suite 200, Georgetown, Texas 78628 pursuant to PUC Procedural Rule 22.143, 16 Tex. Admin. Code § 22.145. 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, or any expert witness of Complainants with knowledge related to the area of your testimony may attend this deposition.

Dr. Victoria Harkins 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 deposition, hearing, or trial testimony of Dr. Harkins in any other proceeding before any state or federal court or state or federal agency relating to Dr. Harkins' opinions on "CCNs and the regulation of CCNs by state agencies" on "CCN

regulations, discriminatory aspects of CCNs, treatment of cities as a CCN holder” and/or on “state agency policy on CCNs.”

- b. All documents provided to, reviewed by, or prepared by or for Dr. Harkins in anticipation of her testimony in this proceeding.
- c. All written communications between Dr. Harkins and any party to this proceeding relating to this proceeding or the subject matter of this proceeding.

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 Dr. Victoria Harkins 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
VILLAS 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 16th day of November 2016:

Art Rodriguez
Russell & Rodriguez, L.L.P.
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Georgetown, Texas 78268
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Via email

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Via email

/s/ Mallory Beck
Mallory Beck