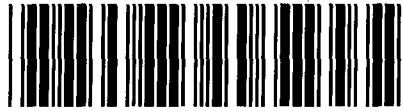


Control Number: 45870



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Addendum StartPage: 0

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

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FORMAL COMPLAINT OF KER-SEVA
LTD. AGAINST THE CITY OF FRISCO,
TEXAS

§
§
§

BEFORE THE
STATE OFFICE OF
ADMINISTRATIVE HEARINGS
PUBLIC UTILITY COMMISSION
FILING CLERK

**ADC WEST RIDGE, L.P. AND CENTER FOR HOUSING RESOURCES, INC.'S
RESPONSES TO CITY OF FRISCO'S SECOND SET OF REQUESTS FOR
INFORMATION AND REQUESTS FOR ADMISSION**

ADC West Ridge, L.P. and Center for Housing Resources, Inc. ("Complainants") file these Responses to City of Frisco's ("Frisco RFI") Second Set of Requests for Information ("RFI") and requests for Admission ("RFA"), which was filed with the Public Utility Commission of Texas and served on ADC West Ridge Villas, L.P. and Center for Housing Resources, Inc. on November 3, 2016. These responses are timely filed. ADC West Ridge, L.P. and Center for Housing Resources, Inc. agree and stipulate that all parties may treat these responses as if the answers were filed under oath. Complainants and Frisco agreed to amend some of the requests which are reflected herein.

Respectfully submitted,

JACKSON WALKER L.L.P.

By: Mallory Beck
Leonard Dougal - State Bar No. 06031400
Ali Abazari - State Bar No. 00796094
Mallory Beck - State Bar No. 24073899
100 Congress, Suite 1100
Austin, Texas 78701
E: ldougal@jw.com
T: (512) 236 2000
F: (512) 391-2112

ATTORNEYS FOR COMPLAINANTS
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 23rd day of November 2016:

Art Rodriguez
Russell & Rodriguez, L.L.P.
1633 Williams Dr., Bldg. 2, Suite 200
Georgetown, Texas 78268
arodriguez@txadminlaw.com
Attorney for City of Frisco

Via email and U.S. First Class Mail

Richard Abernathy
Abernathy Roeder Boyd & Hullett, P.C.
1700 Redbud Boulevard, Suite 300
McKinney, Texas 75069
rabernathy@abernathy-law.com
Attorney for City of Frisco

Via email and U.S. First Class Mail

Sam Chang
Attorney – Legal Division
Public Utility Commission of Texas
1701 N. Congress Avenue
P. O. Box 13326
Austin, Texas 78711-3326
sam.change@puc.texas.gov
Attorney for Public Utility Commission of Texas

Via email and U.S. First Class Mail



Mallory Beck

**PUC DOCKET NO. 45870
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FORMAL COMPLAINT OF KER-SEVA LTD. AGAINST THE CITY OF FRISCO, TEXAS	§ § §	BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS
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**KER-SEVA, LTD., ADC WEST RIDGE VILLAS, L.P. AND CENTER FOR HOUSING
RESOURCES, INC.'S RESPONSES TO CITY OF FRISCO'S SECOND SET OF
REQUESTS FOR INFORMATION AND REQUESTS FOR ADMISSION**

Frisco RFI 105. Please produce all documents evidencing any easements or other property interest acquired or attempted to be acquired to receive retail water service to by Ker Seva to:

- a. the Property
- b Lot 1
- c. Lot 2

RESPONSE:

Ker-Seva, Ltd. is no longer a party to this proceeding.

Prepared/Sponsored by: None

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

FORMAL COMPLAINT OF KER-SEVA LTD. AGAINST THE CITY OF FRISCO, TEXAS	§ § §	BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS
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**KER-SEVA, LTD., ADC WEST RIDGE VILLAS, L.P. AND CENTER FOR HOUSING
RESOURCES, INC.'S RESPONSES TO CITY OF FRISCO'S SECOND SET OF
REQUESTS FOR INFORMATION AND REQUESTS FOR ADMISSION**

Frisco RFI 106: Please produce all documents evidencing any easements or other property interest acquired or attempted to be acquired to receive retail water service to by ADC West Ridge to:

- a. The Property
- b. Lot 1
- c. Lot 2

RESPONSE:

Please see documents produced in response to RFI Nos. 11, 12, 14, and 15, and documents enclosed herein and bates labeled ADC01441-01460.

Prepared/Sponsored by: Terri Anderson
Authorized Representative of
ADC West Ridge, L.P. & Center for Housing Resources, Inc.

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

FORMAL COMPLAINT OF KER-SEVA LTD. AGAINST THE CITY OF FRISCO, TEXAS	§ § §	BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS
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**KER-SEVA, LTD., ADC WEST RIDGE VILLAS, L.P. AND CENTER FOR HOUSING
RESOURCES, INC.'S RESPONSES TO CITY OF FRISCO'S SECOND SET OF
REQUESTS FOR INFORMATION AND REQUESTS FOR ADMISSION**

Frisco RFI 107: Please produce all documents evidencing any easements or other property interest acquired or attempted to be acquired to receive retail water service to by Center for Housing Resources to:

- a. The Property
- b. Lot 1
- c. Lot 2

RESPONSE:

Please see documents produced in response to RFI Nos. 11, 12, 14, and 15, and documents enclosed herein and bates labeled ADC01441-01460.

Prepared/Sponsored by: Terri Anderson
Authorized Representative of
ADC West Ridge, L.P. & Center for Housing Resources, Inc.

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

FORMAL COMPLAINT OF KER-SEVA LTD. AGAINST THE CITY OF FRISCO, TEXAS	§ § §	BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS
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**KER-SEVA, LTD., ADC WEST RIDGE VILLAS, L.P. AND CENTER FOR HOUSING
RESOURCES, INC.'S RESPONSES TO CITY OF FRISCO'S SECOND SET OF
REQUESTS FOR INFORMATION AND REQUESTS FOR ADMISSION**

Frisco RFI 108: Please produce all documents evidencing any easements or other property interest acquired or attempted to be acquired to receive retail sewer service to by Ker Seva to:

- a. The Property
- b. Lot 1
- c. Lot 2

RESPONSE:

Ker-Seva, Ltd. is no longer a party to this proceeding.

Prepared/Sponsored by: None

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

FORMAL COMPLAINT OF KER-SEVA, LTD. AGAINST THE CITY OF FRISCO, TEXAS	§ § §	BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS
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**KER-SEVA, LTD., ADC WEST RIDGE VILLAS, L.P. AND CENTER FOR HOUSING
RESOURCES, INC.'S RESPONSES TO CITY OF FRISCO'S SECOND SET OF
REQUESTS FOR INFORMATION AND REQUESTS FOR ADMISSION**

Frisco RFI 109: Please produce all documents evidencing any easements or other property interest acquired or attempted to be acquired to receive retail sewer service to by ADC West Ridge to:

- a. The Property
- b. Lot 1
- c. Lot 2

RESPONSE:

Please see documents produced in response to RFI Nos. 11, 12, 14; and 15, and documents enclosed herein and bates labeled ADC01441-01460.

Prepared/Sponsored by: Terri Anderson
 Authorized Representative of
 ADC West Ridge, L.P. & Center for Housing Resources, Inc.

PUC DOCKET NO. 45870
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FORMAL COMPLAINT OF KER-SEVA LTD. AGAINST THE CITY OF FRISCO, TEXAS	§ § §	BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS
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**KER-SEVA, LTD., ADC WEST RIDGE VILLAS, L.P. AND CENTER FOR HOUSING
RESOURCES, INC.'S RESPONSES TO CITY OF FRISCO'S SECOND SET OF
REQUESTS FOR INFORMATION AND REQUESTS FOR ADMISSION**

Frisco RFI 110: Please produce all documents evidencing any easements or other property interest acquired or attempted to be acquired to receive retail water service to by Center for Housing Resources to:

- a. The Property
- b. Lot 1
- c. Lot 2

RESPONSE:

Please see documents produced in response to RFI Nos. 11, 12, 14, and 15, and documents enclosed herein and bates labeled ADC01441-01460.

Prepared/Sponsored by: Terri Anderson
Authorized Representative of
ADC West Ridge, L.P. & Center for Housing Resources, Inc.

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

FORMAL COMPLAINT OF KER-SEVA LTD. AGAINST THE CITY OF FRISCO, TEXAS	§ § §	BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS
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**KER-SEVA, LTD., ADC WEST RIDGE VILLAS, L.P. AND CENTER FOR HOUSING
RESOURCES, INC.'S RESPONSES TO CITY OF FRISCO'S SECOND SET OF
REQUESTS FOR INFORMATION AND REQUESTS FOR ADMISSION**

Frisco RFI 111: Please produce all documents regarding any communication with the City of McKinney to receive retail water service by Ker Seva to:

- d. The Property
- e. Lot 1
- f. Lot 2

RESPONSE:

Ker-Seva, Ltd. is no longer a party to this proceeding.

Prepared/Sponsored by: None

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

FORMAL COMPLAINT OF KER-SEVA LTD. AGAINST THE CITY OF FRISCO, TEXAS	§ § §	BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS
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**KER-SEVA, LTD., ADC WEST RIDGE VILLAS, L.P. AND CENTER FOR HOUSING
RESOURCES, INC.'S RESPONSES TO CITY OF FRISCO'S SECOND SET OF
REQUESTS FOR INFORMATION AND REQUESTS FOR ADMISSION**

Frisco RFI 112: Please produce all documents regarding any communication with the City of McKinney to receive retail water service by ADC West Ridge to:

- d. The Property
- e. Lot 1
- f. Lot 2

RESPONSE:

Please see documents produced in response to RFI Nos. 11, 12, 14, and 15. Discovery is ongoing, and Complainants will supplement this response.

Prepared/Sponsored by: Terri Anderson
 Authorized Representative of
 ADC West Ridge, L.P. & Center for Housing Resources, Inc.

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

FORMAL COMPLAINT OF KER-SEVA LTD. AGAINST THE CITY OF FRISCO, TEXAS	§ § §	BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS
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**KER-SEVA, LTD., ADC WEST RIDGE VILLAS, L.P. AND CENTER FOR HOUSING
RESOURCES, INC.'S RESPONSES TO CITY OF FRISCO'S SECOND SET OF
REQUESTS FOR INFORMATION AND REQUESTS FOR ADMISSION**

Frisco RFI 113: Please produce all documents regarding any communication with the City of McKinney to receive retail water service by Center for Housing Resources to:

- d. The Property
- e. Lot 1
- f. Lot 2

RESPONSE:

Please see documents produced in response to RFI Nos. 11, 12, 14, and 15. Discovery is ongoing, and Complainants will supplement this response.

Prepared/Sponsored by: Terri Anderson
Authorized Representative of
ADC West Ridge, L.P. & Center for Housing Resources, Inc.

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

FORMAL COMPLAINT OF KER-SEVA LTD. AGAINST THE CITY OF FRISCO, TEXAS	§ § §	BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS
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**KER-SEVA, LTD., ADC WEST RIDGE VILLAS, L.P. AND CENTER FOR HOUSING
RESOURCES, INC.'S RESPONSES TO CITY OF FRISCO'S SECOND SET OF
REQUESTS FOR INFORMATION AND REQUESTS FOR ADMISSION**

Frisco RFI 114: Please produce all documents regarding any communication with the City of McKinney to receive retail sewer service by Ker-Seva to:

- d. The Property
- e. Lot 1
- f. Lot 2

RESPONSE:

Ker-Seva, Ltd. is no longer a party to this proceeding.

Prepared/Sponsored by: None

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

FORMAL COMPLAINT OF KER-SEVA LTD. AGAINST THE CITY OF FRISCO, TEXAS	§ § §	BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS
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**KER-SEVA, LTD., ADC WEST RIDGE VILLAS, L.P. AND CENTER FOR HOUSING
RESOURCES, INC.'S RESPONSES TO CITY OF FRISCO'S SECOND SET OF
REQUESTS FOR INFORMATION AND REQUESTS FOR ADMISSION**

Frisco RFI 115: Please produce all documents regarding any communication with the City of McKinney to receive retail sewer service by ADC West Ridge to:

- d. The Property
- e. Lot 1
- f. Lot 2

RESPONSE:

Please see documents produced in response to RFI Nos. 11, 12, 14, and 15. Discovery is ongoing, and Complainants will supplement this response.

Prepared/Sponsored by: Terri Anderson
Authorized Representative of
ADC West Ridge, L.P. & Center for Housing Resources, Inc.

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

FORMAL COMPLAINT OF KER-SEVA LTD. AGAINST THE CITY OF FRISCO, TEXAS	§ § §	BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS
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**KER-SEVA, LTD., ADC WEST RIDGE VILLAS, L.P. AND CENTER FOR HOUSING
RESOURCES, INC.'S RESPONSES TO CITY OF FRISCO'S SECOND SET OF
REQUESTS FOR INFORMATION AND REQUESTS FOR ADMISSION**

Frisco RFI 116: Please produce all documents regarding any communication with the City of McKinney to receive retail sewer service by Center for Housing Resources to:

- d. The Property
- e. Lot 1
- f. Lot 2

RESPONSE:

Please see documents produced in response to RFI Nos. 11, 12, 14, and 15. Discovery is ongoing, and Complainants will supplement this response.

Prepared/Sponsored by: Terri Anderson
Authorized Representative of
ADC West Ridge, L.P. & Center for Housing Resources, Inc.

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

**FORMAL COMPLAINT OF KER-SEVA
LTD. AGAINST THE CITY OF FRISCO,
TEXAS**

§
§
§

**BEFORE THE
STATE OFFICE OF
ADMINISTRATIVE HEARINGS**

**KER-SEVA, LTD., ADC WEST RIDGE VILLAS, L.P. AND CENTER FOR HOUSING
RESOURCES, INC.'S RESPONSES TO CITY OF FRISCO'S SECOND SET OF
REQUESTS FOR INFORMATION AND REQUESTS FOR ADMISSION**

Frisco RFI 117: Please indicate the date Exhibit B was drafted and identify the persons to whom Complainants provided the document.

RESPONSE:

This request is subject to an objection by Complainants.

Prepared/Sponsored by: To be supplemented.

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

FORMAL COMPLAINT OF KER-SEVA LTD. AGAINST THE CITY OF FRISCO, TEXAS	- § § §	BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS
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**KER-SEVA, LTD., ADC WEST RIDGE VILLAS, L.P. AND CENTER FOR HOUSING
RESOURCES, INC.'S RESPONSES TO CITY OF FRISCO'S SECOND SET OF
REQUESTS FOR INFORMATION AND REQUESTS FOR ADMISSION**

Frisco RFI 118: Exhibit B refers to and identifies Exhibit A through BB.

RESPONSE:

Subject to Complainants' objection to this Request, please see documents produced herein bates labeled ADC01461-01674.

Prepared/Sponsored by: Terri Anderson
 Authorized Representative of ,
 ADC West Ridge, L.P. & Center for Housing Resources, Inc.

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

FORMAL COMPLAINT OF KER-SEVA LTD. AGAINST THE CITY OF FRISCO, TEXAS	§ § §	BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS
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**KER-SEVA, LTD., ADC WEST RIDGE VILLAS, L.P. AND CENTER FOR HOUSING
RESOURCES, INC.'S RESPONSES TO CITY OF FRISCO'S SECOND SET OF
REQUESTS FOR INFORMATION AND REQUESTS FOR ADMISSION**

Frisco RFI 119: Please produce the video referred to in Exhibit B for the entry dated 10/6/2016.

RESPONSE:

Please see the videos enclosed herein and bates labeled through their file names as ADC01431-01439.

Prepared/Sponsored by: Terri Anderson
 Authorized Representative of
 ADC West Ridge, L.P. & Center for Housing Resources, Inc.

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

FORMAL COMPLAINT OF KER-SEVA LTD. AGAINST THE CITY OF FRISCO, TEXAS	§ § §	BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS
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**KER-SEVA, LTD., ADC WEST RIDGE VILLAS, L.P. AND CENTER FOR HOUSING
RESOURCES, INC.'S RESPONSES TO CITY OF FRISCO'S SECOND SET OF
REQUESTS FOR INFORMATION AND REQUESTS FOR ADMISSION**

Frisco RFI 120: After the entry on 10/6/2016 in Exhibit B, the following text appears: *"Frisco and McKinney inspectors and police drive by constantly intimidating contractors, parking on site and stopping work without jurisdiction threatening statutorily prohibited arrest and fines."* Please detail all such incidences referred to in the quoted text, including the date the incidences occurred. Please include the date, name, position, and address of each person involved in such incidences. In addition, produce all documents that relate to each incident referred to in the quoted text.

RESPONSE:

Subject to Complainants' objection, Complainants respond: There have been numerous incidences as explained in the quoted sentence. The date such incidences occurred were not recorded outside of the document from which this quote was obtained. Terri Anderson, courtesy of Complainants' counsel, as the authorized representative of Complainants was present for some of those incidences. Please see the documents produced in response to RFI Nos. 11, 12, 14, 15, 118, and 119. Please also see the documents produced herein bates labeled ADC01675-01682.

Prepared/Sponsored by: Terri Anderson
 Authorized Representative of
 ADC West Ridge, L.P. & Center for Housing Resources, Inc.

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

FORMAL COMPLAINT OF KER-SEVA LTD. AGAINST THE CITY OF FRISCO, TEXAS.	§ § §	BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS
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**KER-SEVA, LTD., ADC WEST RIDGE VILLAS, L.P. AND CENTER FOR HOUSING
RESOURCES, INC.'S RESPONSES TO CITY OF FRISCO'S SECOND SET OF
REQUESTS FOR INFORMATION AND REQUESTS FOR ADMISSION**

Frisco RFI 121: For the entry dated 9/15/2016 on Exhibit B, please produce all documents that relate to any statement or assertion contained in said entry.

RESPONSE:

Subject to Complainants' objection, please see the documents produced in response to RFI Nos. 11, 12, 14, 15, 118, 119, and 120, the audio filed enclosed herein bates labeled through its file name as ADC01440 and the document enclosed herein bates labeled ADC01683.

Prepared/Sponsored by: Terri Anderson
Authorized Representative of
ADC West Ridge, L.P. & Center for Housing Resources, Inc.

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

FORMAL COMPLAINT OF KER-SEVA LTD. AGAINST THE CITY OF FRISCO, TEXAS	§ § §	BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS
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**KER-SEVA, LTD., ADC WEST RIDGE VILLAS, L.P. AND CENTER FOR HOUSING
RESOURCES, INC.'S RESPONSES TO CITY OF FRISCO'S SECOND SET OF
REQUESTS FOR INFORMATION AND REQUESTS FOR ADMISSION**

Frisco RFI 122: Please identify all facts, information, and understandings, including names and addresses of person from whom you obtained such information, from which you detail the assertions contained in the entry dated 9/15/2016 on Exhibit B.

RESPONSE:

Subject to Complainants' objection, pursuant to 16 Tex. Admin. Code § 22.144(c)(2)(E), please see the documents produced in response to RFI Nos. 11, 12, 14, 15, 118, 119, and 120. Terri Anderson provided the information detailed in the entry dated 9/15/2016.

Prepared/Sponsored by: Terri Anderson
Authorized Representative of
ADC West Ridge, L.P. & Center for Housing Resources, Inc.

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

FORMAL COMPLAINT OF KER-SEVA LTD. AGAINST THE CITY OF FRISCO, TEXAS	§ § §	BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS
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**KER-SEVA, LTD., ADC WEST RIDGE VILLAS, L.P. AND CENTER FOR HOUSING
RESOURCES, INC.'S RESPONSES TO CITY OF FRISCO'S SECOND SET OF
REQUESTS FOR INFORMATION AND REQUESTS FOR ADMISSION**

Frisco RFI 123: For the entry dated 1/7/2015 on Exhibit B, please produce all documents that relate to any statement or assertion contained in said entry.

RESPONSE:

Subject to Complainants' objection, please see documents produced in response to RFI Nos. 11, 12, 14, 15, and 118.

Prepared/Sponsored by: Terri Anderson
 Authorized Representative of
 ADC West Ridge, L.P. & Center for Housing Resources, Inc.

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

FORMAL COMPLAINT OF KER-SEVA LTD. AGAINST THE CITY OF FRISCO, TEXAS	§ § §	BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS
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**KER-SEVA, LTD., ADC WEST RIDGE VILLAS, L.P. AND CENTER FOR HOUSING
RESOURCES, INC.'S RESPONSES TO CITY OF FRISCO'S SECOND SET OF
REQUESTS FOR INFORMATION AND REQUESTS FOR ADMISSION**

Frisco RFI 124: Please identify all facts, information, and understandings, including names and addresses of person from whom you obtained such information, from which you detail the assertions contained in the entry dated 1/7/2015 on Exhibit B.

RESPONSE:

Subject to Complainants' objections, pursuant to 16 Tex. Admin. Code § 22.144(c)(2)(E), please see documents produced in response to RFI Nos. 11, 12, 14, 15, and 118. Terri Anderson provided the information detailed in the entry dated 1/7/2015.

Prepared by/sponsored by: Terri Anderson
Authorized Representative of
ADC West Ridge, L.P. & Center for Housing Resources, Inc.

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

FORMAL COMPLAINT OF KER-SEVA LTD. AGAINST THE CITY OF FRISCO, TEXAS	§ § §	BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS
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**KER-SEVA, LTD., ADC WEST RIDGE VILLAS, L.P. AND CENTER FOR HOUSING
RESOURCES, INC.'S RESPONSES TO CITY OF FRISCO'S SECOND SET OF
REQUESTS FOR INFORMATION AND REQUESTS FOR ADMISSION**

Frisco RFI 125: For the entry dated 1/26/2015 on Exhibit B, please produce all documents that relate to any statement or assertion contained in said entry.

RESPONSE:

Subject to Complainants' objections, please see documents produced in response to RFI Nos. 11, 12, 14, 15, and 118.

Prepared/Sponsored by:	Terri Anderson Authorized Representative of ADC West Ridge, L.P. & Center for Housing Resources, Inc.
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**PUC DOCKET NO. 45870
SOAH DOCKET NO. 473-16-4619.WS**

FORMAL COMPLAINT OF KER-SEVA LTD. AGAINST THE CITY OF FRISCO, TEXAS	§ § §	BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS
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**KER-SEVA, LTD., ADC WEST RIDGE VILLAS, L.P. AND CENTER FOR HOUSING
RESOURCES, INC.'S RESPONSES TO CITY OF FRISCO'S SECOND SET OF
REQUESTS FOR INFORMATION AND REQUESTS FOR ADMISSION**

Frisco RFI 126: Please identify all facts, information, and understandings, including names and addresses of person from whom you obtained such information, from which you detail the assertions contained in the entry dated 1/26/2015 on Exhibit B.

RESPONSE:

Subject to Complainants' objections, pursuant to 16 Tex. Admin. Code § 22.144(c)(2)(E), please see documents produced in response to RFI Nos. 11, 12, 14, 15, and 118. Terri Anderson provided the information detailed in the entry dated 1/26/2015.

Prepared by/sponsored by: Terri Anderson
Authorized Representative of
ADC West Ridge, L.P. & Center for Housing Resources, Inc.

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

FORMAL COMPLAINT OF KER-SEVA LTD. AGAINST THE CITY OF FRISCO, TEXAS	§ § §	BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS
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**KER-SEVA, LTD., ADC WEST RIDGE VILLAS, L.P. AND CENTER FOR HOUSING
RESOURCES, INC.'S RESPONSES TO CITY OF FRISCO'S SECOND SET OF
REQUESTS FOR INFORMATION AND REQUESTS FOR ADMISSION**

Frisco RFI 127: For the entry dated 2/13/2016 on Exhibit B, please produce all documents that relate to any statement or assertion contained in said entry.

RESPONSE:

Subject to Complainants' objections, please see documents produced in response to RFI Nos. 11, 12, 14, 15, and 118.

Prepared by/sponsored by: Terri Anderson
Authorized Representative of
ADC West Ridge, L.P. & Center for Housing Resources, Inc.

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

FORMAL COMPLAINT OF KER-SEVA LTD. AGAINST THE CITY OF FRISCO, TEXAS	§ § §	BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS
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**KER-SEVA, LTD., ADC WEST RIDGE VILLAS, L.P. AND CENTER FOR HOUSING
RESOURCES, INC.'S RESPONSES TO CITY OF FRISCO'S SECOND SET OF
REQUESTS FOR INFORMATION AND REQUESTS FOR ADMISSION**

Frisco RFI 128: Please identify all facts, information, and understandings, including names and addresses of person from whom you obtained such information, from which you detail the assertions contained in the entry dated 2/13/2016 on Exhibit B:

RESPONSE:

Subject to Complainants' objections, pursuant to 16 Tex. Admin. Code § 22.144(c)(2)(E), please see documents produced in response to RFI Nos. 11, 12, 14, 15, and 118. Terri Anderson provided the information detailed in the entry dated 2/13/2016:

Prepared by/sponsored by: Terri Anderson
Authorized Representative of
ADC West Ridge, L.P. & Center for Housing Resources, Inc.

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

FORMAL COMPLAINT OF KER-SEVA LTD. AGAINST THE CITY OF FRISCO, TEXAS	§ § §	BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS
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**KER-SEVA, LTD., ADC WEST RIDGE VILLAS, L.P. AND CENTER FOR HOUSING
RESOURCES, INC.'S RESPONSES TO CITY OF FRISCO'S SECOND SET OF
REQUESTS FOR INFORMATION AND REQUESTS FOR ADMISSION**

Frisco RFI 129: For the entry dated 2/16/2015 on Exhibit B, please produce all documents that relate to any statement or assertion contained in said entry.

RESPONSE:

Subject to Complainants' objections, please see documents produced in response to RFI Nos. 11, 12, 14, 15, 118, 197, and 198.

Prepared/sponsored by: Terri Anderson
 Authorized Representative of
 ADC West Ridge, L.P. & Center for Housing Resources, Inc.

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

FORMAL COMPLAINT OF KER-SEVA LTD. AGAINST THE CITY OF FRISCO, TEXAS	§ § §	BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS
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**KER-SEVA, LTD., ADC WEST RIDGE VILLAS, L.P. AND CENTER FOR HOUSING
RESOURCES, INC.'S RESPONSES TO CITY OF FRISCO'S SECOND SET OF
REQUESTS FOR INFORMATION AND REQUESTS FOR ADMISSION**

Frisco RFI 130: Please identify all facts, information, and understandings, including names and addresses of person from whom you obtained such information, from which you detail the assertions contained in the entry dated 2/16/2015 on Exhibit B.

RESPONSE:

Subject to Complainants' objections, pursuant to 16 Tex. Admin. Code § 22.144(c)(2)(E), please see documents produced in response to Nos. 11, 12, 14, 15, 118, 197, and 198. Terri Anderson provided the information detailed in the entry dated 2/13/2016.

Prepared by/sponsored by: Terri Anderson
Authorized Representative of
ADC West Ridge, L.P. & Center for Housing Resources, Inc.

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

FORMAL COMPLAINT OF KER-SEVA LTD. AGAINST THE CITY OF FRISCO, TEXAS	§ § §	BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS
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**KER-SEVA, LTD., ADC WEST RIDGE VILLAS, L.P. AND CENTER FOR HOUSING
RESOURCES, INC.'S RESPONSES TO CITY OF FRISCO'S SECOND SET OF
REQUESTS FOR INFORMATION AND REQUESTS FOR ADMISSION**

Frisco RFI 131: For the entry dated 2/17/2015 on Exhibit B, please produce all documents that relate to any statement or assertion contained in said entry.

RESPONSE:

Subject to Complainants' objections, please see documents produced in response to RFI Nos. 11, 12, 14, 15, and 118.

Prepared/Sponsored by: Terri Anderson
 Authorized Representative of
 ADC West Ridge, L.P. & Center for Housing Resources, Inc.

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

FORMAL COMPLAINT OF KER-SEVA LTD. AGAINST THE CITY OF FRISCO, TEXAS	§ § §	BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS
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**KER-SEVA, LTD., ADC WEST RIDGE VILLAS, L.P. AND CENTER FOR HOUSING
RESOURCES, INC.'S RESPONSES TO CITY OF FRISCO'S SECOND SET OF
REQUESTS FOR INFORMATION AND REQUESTS FOR ADMISSION**

Frisco RFI 132: Please identify all facts, information, and understandings, including names and addresses of person from whom you obtained such information, from which you detail the assertions contained in the entry dated 2/17/2015 on Exhibit B.

RESPONSE:

Subject to Complainants' objections, pursuant to 16 Tex. Admin. Code § 22.144(c)(2)(E), please see documents produced in response to RFI Nos. 11, 12, 14, 15, and 118. Terri Anderson provided the information detailed in the entry dated 2/17/2015.

Prepared by/sponsored by: Terri Anderson
Authorized Representative of
ADC West Ridge, L.P. & Center for Housing Resources, Inc.

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

FORMAL COMPLAINT OF KER-SEVA LTD. AGAINST THE CITY OF FRISCO, TEXAS	§ § §	BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS
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**KER-SEVA, LTD., ADC WEST RIDGE VILLAS, L.P. AND CENTER FOR HOUSING
RESOURCES, INC.'S RESPONSES TO CITY OF FRISCO'S SECOND SET OF
REQUESTS FOR INFORMATION AND REQUESTS FOR ADMISSION**

Frisco RFI 133: For the entry dated 2/20/2015 on Exhibit B, please produce all documents that relate to any statement or assertion contained in said entry.

RESPONSE:

Subject to Complainants' objections, please see the documents produced in response to RFI Nos. 11, 12, 14, 15, and 118. Discovery is ongoing, and Complainants will supplement this response.

Prepared by/sponsored by: Terri Anderson
Authorized Representative of
ADC West Ridge, L.P. & Center for Housing Resources, Inc.

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

FORMAL COMPLAINT OF KER-SEVA LTD. AGAINST THE CITY OF FRISCO, TEXAS	§ § §	BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS
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**KER-SEVA, LTD., ADC WEST RIDGE VILLAS, L.P. AND CENTER FOR HOUSING
RESOURCES, INC.'S RESPONSES TO CITY OF FRISCO'S SECOND SET OF
REQUESTS FOR INFORMATION AND REQUESTS FOR ADMISSION**

Frisco RFI 134: Please identify all facts, information, and understandings, including names and addresses of person from whom you obtained such information, from which you detail the assertions contained in the entry dated 2/20/2015 on Exhibit B.

RESPONSE:

Subject to Complainants' objections, pursuant to 16 Tex. Admin. Code § 22.144(c)(2)(E), please see documents produced in response to RFI Nos. 11, 12, 14, 15, 118, and 133. Terri Anderson provided the information detailed in the entry dated 2/20/2015.

Prepared by/sponsored by: Terri Anderson
Authorized Representative of
ADC West Ridge, L.P. & Center for Housing Resources, Inc.

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

FORMAL COMPLAINT OF KER-SEVA LTD. AGAINST THE CITY OF FRISCO, TEXAS	§ § §	BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS
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**KER-SEVA, LTD., ADC WEST RIDGE VILLAS, L.P. AND CENTER FOR HOUSING
RESOURCES, INC.'S RESPONSES TO CITY OF FRISCO'S SECOND SET OF
REQUESTS FOR INFORMATION AND REQUESTS FOR ADMISSION**

Frisco RFI 135: For the entry dated 2/24/2015 on Exhibit B, please produce all documents that relate to any statement or assertion contained in said entry.

RESPONSE:

Subject to Complainants' objection, please see documents produced in response to RFI Nos. 11, 12, 14, 15, and 118, and documents enclosed herein bates-labeled ADC01684-01685.

Prepared by/sponsored by: Terri Anderson
Authorized Representative of
ADC West Ridge, L.P. & Center for Housing Resources, Inc.

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

FORMAL COMPLAINT OF KER-SEVA LTD. AGAINST THE CITY OF FRISCO, TEXAS	§ § §	BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS
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**KER-SEVA, LTD., ADC WEST RIDGE VILLAS, L.P. AND CENTER FOR HOUSING
RESOURCES, INC.'S RESPONSES TO CITY OF FRISCO'S SECOND SET OF
REQUESTS FOR INFORMATION AND REQUESTS FOR ADMISSION**

Frisco RFI 136: Please identify all facts, information, and understandings, including names and addresses of person from whom you obtained such information, from which you detail the assertions contained in the entry dated 2/24/2015 on Exhibit B.

RESPONSE:

Subject to Complainants' objections, pursuant to 16 Tex. Admin. Code § 22.144(c)(2)(E), please see documents produced in response to RFI Nos. 11, 12, 14, 15, 118, and 135. Terri Anderson provided the information detailed in the entry dated 2/24/2015.

Prepared by/sponsored by: Terri Anderson
Authorized Representative of
ADC West Ridge, L.P. & Center for Housing Resources, Inc.

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

**FORMAL COMPLAINT OF KER-SEVA
LTD. AGAINST THE CITY OF FRISCO,
TEXAS**

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**BEFORE THE
STATE OFFICE OF
ADMINISTRATIVE HEARINGS**

**KER-SEVA, LTD., ADC WEST RIDGE VILLAS, L.P. AND CENTER FOR HOUSING
RESOURCES, INC.'S RESPONSES TO CITY OF FRISCO'S SECOND SET OF
REQUESTS FOR INFORMATION AND REQUESTS FOR ADMISSION**

Frisco RFI 137: For the entries dated 3/3/2015 on Exhibit B, please produce all documents that relate to any statement or assertion contained in said entry.

RESPONSE:

Subject to Complainants' objections, please see documents produced in response to RFI Nos. 11, 12, 14, 15, and 118, and the documents enclosed herein and bates labeled ADC01686-01702.

Prepared by/sponsored by: Terri Anderson
Authorized Representative of
ADC West Ridge, L.P. & Center for Housing Resources, Inc.

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

FORMAL COMPLAINT OF KER-SEVA LTD. AGAINST THE CITY OF FRISCO, TEXAS	§ § §	BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS
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**KER-SEVA, LTD., ADC WEST RIDGE VILLAS, L.P. AND CENTER FOR HOUSING
RESOURCES, INC.'S RESPONSES TO CITY OF FRISCO'S SECOND SET OF
REQUESTS FOR INFORMATION AND REQUESTS FOR ADMISSION**

Frisco RFI 138: Please identify all facts, information, and understandings, including names and addresses of person from whom you obtained such information, from which you detail the assertions contained in the entries dated 3/3/2015 on Exhibit B.

RESPONSE:

Subject to Complainants' objections, pursuant to 16 Tex. Admin. Code § 22.144(c)(2)(E), please see documents produced in response to RFI Nos. 11, 12, 14, 15, 118, and 137. Terri Anderson provided the information detailed in the entries dated 3/3/2015.

Prepared by/sponsored by: Terri Anderson
Authorized Representative of
ADC West Ridge, L.P. & Center for Housing Resources, Inc.

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

FORMAL COMPLAINT OF KER-SEVA LTD. AGAINST THE CITY OF FRISCO, TEXAS	§ § §	BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS
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**KER-SEVA, LTD., ADC WEST RIDGE VILLAS, L.P. AND CENTER FOR HOUSING
RESOURCES, INC.'S RESPONSES TO CITY OF FRISCO'S SECOND SET OF
REQUESTS FOR INFORMATION AND REQUESTS FOR ADMISSION**

Frisco RFI 139: For the entry dated 3/16/2015 on Exhibit B, please produce all documents that relate to any statement or assertion contained in said entry.

RESPONSE:

Subject to Complainants' objections, please see documents produced in response to RFI Nos. 11, 12, 14, 15, and 118.

Prepared by/sponsored by: Terri Anderson
Authorized Representative of
ADC West Ridge, L.P. & Center for Housing Resources, Inc.

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

FORMAL COMPLAINT OF KER-SEVA LTD. AGAINST THE CITY OF FRISCO, TEXAS	§ § §	BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS
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**KER-SEVA, LTD., ADC WEST RIDGE VILLAS, L.P. AND CENTER FOR HOUSING
RESOURCES, INC.'S RESPONSES TO CITY OF FRISCO'S SECOND SET OF
REQUESTS FOR INFORMATION AND REQUESTS FOR ADMISSION**

Frisco RFI 140: Please identify all facts, information, and understandings, including names and addresses of person from whom you obtained such information, from which you detail the assertions contained in the entry dated 3/16/2015 on Exhibit B.

RESPONSE:

Subject to Complainants' objections, pursuant to 16 Tex. Admin. Code § 22.144(c)(2)(E), please see documents produced in response to RFI Nos. 11, 12, 14, 15, and 118. Terri Anderson provided the information detailed in the entry dated 3/16/2015.

Prepared by/sponsored by: Terri Anderson
Authorized Representative of
ADC West Ridge, L.P. & Center for Housing Resources, Inc.

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

FORMAL COMPLAINT OF KER-SEVA LTD. AGAINST THE CITY OF FRISCO, TEXAS	§ § §	BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS
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**KER-SEVA, LTD.; ADC WEST RIDGE VILLAS, L.P. AND CENTER FOR HOUSING
RESOURCES, INC.'S RESPONSES TO CITY OF FRISCO'S SECOND SET OF
REQUESTS FOR INFORMATION AND REQUESTS FOR ADMISSION**

Frisco RFI 141: For the entry dated 3/25/2015 on Exhibit B, please produce all documents that relate to any statement or assertion contained in said entry.

RESPONSE:

Subject to Complainants' objections, please see documents produced in response to RFI Nos. 11, 12, 14, 15, and 118.

Prepared by/sponsored by: Terri Anderson
Authorized Representative of
ADC West Ridge, L.P. & Center for Housing Resources, Inc.

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

FORMAL COMPLAINT OF KER-SEVA LTD. AGAINST THE CITY OF FRISCO, TEXAS	§ § §	BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS
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**KER-SEVA, LTD., ADC WEST RIDGE VILLAS, L.P. AND CENTER FOR HOUSING
RESOURCES, INC.'S RESPONSES TO CITY OF FRISCO'S SECOND SET OF
REQUESTS FOR INFORMATION AND REQUESTS FOR ADMISSION**

Frisco RFI 142: Please identify, all facts, information, and understandings, including names and addresses of person from whom you obtained such information, from which you detail the assertions contained in the entry dated 3/25/2015 on Exhibit B.

RESPONSE:

Subject to Complainants' objections, pursuant to 16 Tex. Admin. Code § 22.144(c)(2)(E), please see documents produced in response to RFI Nos. 11, 12, 14, 15, and 118. Terri Anderson provided the information detailed in the entry dated 3/25/2015.

Prepared by/sponsored by: Terri Anderson
Authorized Representative of
ADC West Ridge, L.P. & Center for Housing Resources, Inc.

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

FORMAL COMPLAINT OF KER-SEVA LTD. AGAINST THE CITY OF FRISCO, TEXAS	§ § §	BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS
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**KER-SEVA, LTD., ADC WEST RIDGE VILLAS, L.P. AND CENTER FOR HOUSING
RESOURCES, INC.'S RESPONSES TO CITY OF FRISCO'S SECOND SET OF
REQUESTS FOR INFORMATION AND REQUESTS FOR ADMISSION**

Frisco RFI 143: For the entry dated 4/2/2015 on Exhibit B, please produce all documents that relate to any statement or assertion contained in said entry.

RESPONSE:

Subject to Complainants' objections, please see documents produced in response to RFI Nos. 11, 12, 14, 15, and 118.

Prepared by/sponsored by: Terri Anderson
Authorized Representative of
ADC West Ridge, L.P. & Center for Housing Resources, Inc.

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

FORMAL COMPLAINT OF KER-SEVA LTD. AGAINST THE CITY OF FRISCO, TEXAS	§ § §	BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS
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**KER-SEVA, LTD., ADC WEST RIDGE VILLAS, L.P. AND CENTER FOR HOUSING
RESOURCES, INC.'S RESPONSES TO CITY OF FRISCO'S SECOND SET OF
REQUESTS FOR INFORMATION AND REQUESTS FOR ADMISSION**

Frisco RFI 144: Please identify all facts, information, and understandings, including names and addresses of person from whom you obtained such information, from which you detail the assertions contained in the entry dated 4/2/2015 on Exhibit B.

RESPONSE:

Subject to Complainants' objections, pursuant to 16 Tex. Admin. Code § 22.144(c)(2)(E), please see documents produced in response to RFI Nos. 11, 12, 14, 15, and 118. Terri Anderson provided the information detailed in the entry dated 4/2/2015.

Prepared by/sponsored by: Terri Anderson
Authorized Representative of
ADC West Ridge, L.P. & Center for Housing Resources, Inc.

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

FORMAL COMPLAINT OF KER-SEVA	§	BEFORE THE
LTD. AGAINST THE CITY OF FRISCO,	§	STATE OFFICE OF
TEXAS	§	ADMINISTRATIVE HEARINGS

**KER-SEVA, LTD., ADC WEST RIDGE VILLAS, L.P. AND CENTER FOR HOUSING
RESOURCES, INC.'S RESPONSES TO CITY OF FRISCO'S SECOND SET OF
REQUESTS FOR INFORMATION AND REQUESTS FOR ADMISSION**

Frisco RFI 145: For the entry dated 4/6/2015 on Exhibit B, please produce all documents that relate to any statement or assertion contained in said entry.

RESPONSE:

Subject to Complainants' objections, please see documents produced in response to RFI Nos. 11, 12, 14, 15, and 118.

Prepared by/sponsored by: Terri Anderson
Authorized Representative of
ADC West Ridge, L.P. & Center for Housing Resources, Inc.

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

**FORMAL COMPLAINT OF KER-SEVA
LTD. AGAINST THE CITY OF FRISCO,
TEXAS**

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§

**BEFORE THE
STATE OFFICE OF
ADMINISTRATIVE HEARINGS**

**KER-SEVA, LTD., ADC WEST RIDGE VILLAS, L.P. AND CENTER FOR HOUSING
RESOURCES, INC.'S RESPONSES TO CITY OF FRISCO'S SECOND SET OF
REQUESTS FOR INFORMATION AND REQUESTS FOR ADMISSION**

Frisco RFI 146: Please identify all facts, information, and understandings, including names and addresses of person from whom you obtained such information, from which you detail the assertions contained in the entry dated 4/6/2015 on Exhibit B.

RESPONSE:

Subject to Complainants' objections, pursuant to 16 Tex. Admin. Code § 22.144(c)(2)(E), please see documents produced in response to RFI Nos. 11, 12, 14, 15, and 118. Terri Anderson provided the information detailed in the entry dated 4/6/2015.

Prepared by/sponsored by: Terri Anderson
Authorized Representative of
ADC West Ridge, L.P. & Center for Housing Resources, Inc.

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

FORMAL COMPLAINT OF KER-SEVA LTD. AGAINST THE CITY OF FRISCO, TEXAS	§ § §	BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS
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**KER-SEVA, LTD., ADC WEST RIDGE VILLAS, L.P. AND CENTER FOR HOUSING
RESOURCES, INC.'S RESPONSES TO CITY OF FRISCO'S SECOND SET OF
REQUESTS FOR INFORMATION AND REQUESTS FOR ADMISSION**

Frisco RFI 147: For the entry dated 4/21/2015 on Exhibit B, please produce all documents that relate to any statement or assertion contained in said entry.

RESPONSE:

Subject to Complainants' objections, please see documents produced in response to RFI Nos. 11, 12, 14, 15, and 118.

Prepared by/sponsored by: Terri Anderson
Authorized Representative of
ADC West Ridge, L.P. & Center for Housing Resources, Inc.

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

FORMAL COMPLAINT OF KER-SEVA LTD. AGAINST THE CITY OF FRISCO, TEXAS	§ § §	BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS
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**KER-SEVA, LTD., ADC WEST RIDGE VILLAS, L.P. AND CENTER FOR HOUSING
RESOURCES, INC.'S RESPONSES TO CITY OF FRISCO'S SECOND SET OF
REQUESTS FOR INFORMATION AND REQUESTS FOR ADMISSION**

Frisco RFI 148: Please identify all facts, information, and understandings, including names and addresses of person from whom you obtained such information, from which you detail the assertions contained in the entry dated 4/21/2015 on Exhibit B.

RESPONSE:

Subject to Complainants' objections, pursuant to 16 Tex. Admin. Code § 22.144(c)(2)(E), please see documents produced in response to RFI Nos. 11, 12, 14, 15, and 118. Terri Anderson provided the information detailed in the entry dated 4/21/2015.

Prepared by/sponsored by: Terri Anderson
Authorized Representative of
ADC West Ridge, L.P. & Center for Housing Resources, Inc.

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

FORMAL COMPLAINT OF KER-SEVA LTD. AGAINST THE CITY OF FRISCO, TEXAS	§ § §	BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS
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**KER-SEVA, LTD., ADC WEST RIDGE VILLAS, L.P. AND CENTER FOR HOUSING
RESOURCES, INC.'S RESPONSES TO CITY OF FRISCO'S SECOND SET OF
REQUESTS FOR INFORMATION AND REQUESTS FOR ADMISSION**

Frisco RFI 149: For the entry dated 4/28/2015 on Exhibit B, please produce all documents that relate to any statement or assertion contained in said entry.

RESPONSE:

Subject to Complainants' objections, please see documents produced in response to RFI Nos. 11, 12, 14, 15, and 118.

Prepared by/sponsored by: Terri Anderson
Authorized Representative of
ADC West Ridge, L.P. & Center for Housing Resources, Inc.

**PUC DOCKET NO. 45870
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FORMAL COMPLAINT OF KER-SEVA LTD. AGAINST THE CITY OF FRISCO, TEXAS	§ § §	BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS
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**KER-SEVA, LTD., ADC WEST RIDGE VILLAS, L.P. AND CENTER FOR HOUSING
RESOURCES, INC.'S RESPONSES TO CITY OF FRISCO'S SECOND SET OF
REQUESTS FOR INFORMATION AND REQUESTS FOR ADMISSION**

Frisco RFI 150: Please identify all facts, information, and understandings, including names and addresses of person from whom you obtained such information, from which you detail the assertions contained in the entry dated 4/28/2015 on Exhibit B.

RESPONSE:

Subject to Complainants' objections, pursuant to 16 Tex. Admin. Code § 22.144(c)(2)(E), please see documents produced in response to RFI Nos. 11, 12, 14, 15, and 118. Terri Anderson provided the information detailed in the entry dated 4/28/2015.

Prepared by/sponsored by: Terri Anderson
Authorized Representative of
ADC West Ridge, L.P. & Center for Housing Resources, Inc.

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

FORMAL COMPLAINT OF KER-SEVA LTD. AGAINST THE CITY OF FRISCO, TEXAS	§ § §	BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS
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**KER-SEVA, LTD., ADC WEST RIDGE VILLAS, L.P. AND CENTER FOR HOUSING
RESOURCES, INC.'S RESPONSES TO CITY OF FRISCO'S SECOND SET OF
REQUESTS FOR INFORMATION AND REQUESTS FOR ADMISSION**

Frisco RFI 151: For the entry dated 5/5/2015 on Exhibit B, please produce all documents that relate to any statement or assertion contained in said entry.

RESPONSE:

Subject to Complainants' objections, please see documents produced in response to RFI Nos. 11, 12, 14, 15, and 118.

Prepared by/sponsored by: Terri Anderson
Authorized Representative of
ADC West Ridge, L.P. & Center for Housing Resources, Inc.

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

FORMAL COMPLAINT OF KER-SEVA LTD. AGAINST THE CITY OF FRISCO, TEXAS	§ § §	BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS
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**KER-SEVA, LTD., ADC WEST RIDGE VILLAS, L.P. AND CENTER FOR HOUSING
RESOURCES, INC.'S RESPONSES TO CITY OF FRISCO'S SECOND SET OF
REQUESTS FOR INFORMATION AND REQUESTS FOR ADMISSION**

Frisco RFI 152: Please identify all facts, information, and understandings , including names and addresses of person from whom you obtained such information, from which you detail the assertions contained in the entry dated 5/5/2015 on Exhibit B.

RESPONSE:

Subject to Complainants' objections, pursuant to 16 Tex. Admin. Code § 22.144(c)(2)(E), please see documents produced in response to RFI Nos. 11, 12, 14, 15, and 118. Terri Anderson provided the information detailed in the entry dated 5/5/2015.

Prepared by/sponsored by: Terri Anderson
Authorized Representative of
ADC West Ridge, L.P. & Center for Housing Resources, Inc.

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

FORMAL COMPLAINT OF KER-SEVA LTD. AGAINST THE CITY OF FRISCO, TEXAS	§ § §	BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS
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**KER-SEVA, LTD., ADC WEST RIDGE VILLAS, L.P. AND CENTER FOR HOUSING
RESOURCES, INC.'S RESPONSES TO CITY OF FRISCO'S SECOND SET OF
REQUESTS FOR INFORMATION AND REQUESTS FOR ADMISSION**

Frisco RFI 153: For the entry dated 5/22/2015 on Exhibit B, please produce all documents that relate to any statement or assertion contained in said entry.

RESPONSE:

Subject to Complainants' objections, please see documents produced in response to RFI Nos. 11, 12, 14, 15, and 118.

Prepared by/sponsored by: Terri Anderson
Authorized Representative of
ADC West Ridge, L.P. & Center for Housing Resources, Inc.

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

FORMAL COMPLAINT OF KER-SEVA LTD. AGAINST THE CITY OF FRISCO, TEXAS	§ § §	BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS
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**KER-SEVA, LTD., ADC WEST RIDGE VILLAS, L.P. AND CENTER FOR HOUSING
RESOURCES, INC.'S RESPONSES TO CITY OF FRISCO'S SECOND SET OF
REQUESTS FOR INFORMATION AND REQUESTS FOR ADMISSION**

Frisco RFI 154: Please identify all facts, information, and understandings, including names and addresses of person from whom you obtained such information, from which you detail the assertions contained in the entry dated 5/22/2015 on Exhibit B.

RESPONSE:

Subject to Complainants' objections, pursuant to 16 Tex. Admin. Code § 22.144(c)(2)(E), please see documents produced in response to RFI Nos. 11, 12, 14, 15, and 118. Terri Anderson provided the information detailed in the entry dated 5/22/2015.

Prepared by/sponsored by: Terri Anderson
Authorized Representative of
ADC West Ridge, L.P. & Center for Housing Resources, Inc.

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

FORMAL COMPLAINT OF KER-SEVA LTD. AGAINST THE CITY OF FRISCO, TEXAS	§ § §	BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS
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**KER-SEVA, LTD., ADC WEST RIDGE VILLAS, L.P. AND CENTER FOR HOUSING
RESOURCES, INC.'S RESPONSES TO CITY OF FRISCO'S SECOND SET OF
REQUESTS FOR INFORMATION AND REQUESTS FOR ADMISSION**

Frisco RFI 155: For the entry dated 5/11/2015 through 6/9/2015 on Exhibit B, please produce all documents that relate to any statement or assertion contained in said entry.

RESPONSE:

Subject to Complainants' objections, please see documents produced in response to RFI Nos. 11, 12, 14, 15, and 118.

Prepared by/sponsored by: Terri Anderson
Authorized Representative of
ADC West Ridge, L.P. & Center for Housing Resources, Inc.

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

FORMAL COMPLAINT OF KER-SEVA LTD. AGAINST THE CITY OF FRISCO, TEXAS	§ § §	BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS
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**KER-SEVA, LTD., ADC WEST RIDGE VILLAS, L.P. AND CENTER FOR HOUSING
RESOURCES, INC.'S RESPONSES TO CITY OF FRISCO'S SECOND SET OF
REQUESTS FOR INFORMATION AND REQUESTS FOR ADMISSION**

Frisco RFI 156: Please identify all facts, information, and understandings, including names and addresses of person from whom you obtained such information, from which you detail the assertions contained in the entry dated 5/11/2015 through 6/9/2015 on Exhibit B.

RESPONSE:

Subject to Complainants' objections, pursuant to 16 Tex. Admin. Code § 22.144(c)(2)(E), please see documents produced in response to RFI Nos. 11, 12, 14, 15, and 118. Terri Anderson provided the information detailed in the entry dated 5/11/2015 through 6/9/2015.

Prepared by/sponsored by: Terri Anderson
Authorized Representative of
ADC West Ridge, L.P. & Center for Housing Resources, Inc.

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

FORMAL COMPLAINT OF KER-SEVA LTD. AGAINST THE CITY OF FRISCO, TEXAS	§ § §	BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS
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**KER-SEVA, LTD., ADC WEST RIDGE VILLAS, L.P. AND CENTER FOR HOUSING
RESOURCES, INC.'S RESPONSES TO CITY OF FRISCO'S SECOND SET OF
REQUESTS FOR INFORMATION AND REQUESTS FOR ADMISSION**

Frisco RFI 157: For the entry dated 6/9/2015 on Exhibit B, please produce all documents that relate to any statement or assertion contained in said entry.

RESPONSE:

Subject to Complainants' objections, please see documents produced in response to RFI Nos. 11, 12, 14, 15, and 118.

Prepared by/sponsored by: Terri Anderson
Authorized Representative of
ADC West Ridge, L.P. & Center for Housing Resources, Inc.

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

FORMAL COMPLAINT OF KER-SEVA LTD. AGAINST THE CITY OF FRISCO, TEXAS	§ § §	BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS
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**KER-SEVA, LTD., ADC WEST RIDGE VILLAS, L.P. AND CENTER FOR HOUSING
RESOURCES, INC.'S RESPONSES TO CITY OF FRISCO'S SECOND SET OF
REQUESTS FOR INFORMATION AND REQUESTS FOR ADMISSION**

Frisco RFI 158: Please identify all facts, information, and understandings, including names and addresses of person from whom you obtained such information, from which you detail the assertions contained in the entry dated 6/9/2015 on Exhibit B.

RESPONSE:

Subject to Complainants' objections, pursuant to 16 Tex. Admin. Code, § 22.144(c)(2)(E), please see documents produced in response to RFI Nos. 11, 12, 14, 15, and 118. Terri Anderson provided the information detailed in the entry dated 6/9/2015.

Prepared by/sponsored by: Terri Anderson
Authorized Representative of
ADC West Ridge, L.P. & Center for Housing Resources, Inc.

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

FORMAL COMPLAINT OF KER-SEVA LTD, AGAINST THE CITY OF FRISCO, TEXAS	§ § §	BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS
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**KER-SEVA, LTD., ADC WEST RIDGE VILLAS, L.P. AND CENTER FOR HOUSING
RESOURCES, INC.'S RESPONSES TO CITY OF FRISCO'S SECOND SET OF
REQUESTS FOR INFORMATION AND REQUESTS FOR ADMISSION**

Frisco RFI 159: For the entry dated 7/1/2015 on Exhibit B, please produce all documents that relate to any statement or assertion contained in said entry.

RESPONSE:

Subject to Complainants' objections, please see documents produced in response to RFI Nos. 11, 12, 14, 15, and 118.

Prepared by/sponsored by: Terri Anderson
Authorized Representative of
ADC West Ridge, L.P. & Center for Housing Resources, Inc.

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

FORMAL COMPLAINT OF KER-SEVA . LTD. AGAINST THE CITY OF FRISCO, TEXAS	§ § §	BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS
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**KER-SEVA, LTD., ADC WEST RIDGE VILLAS, L.P. AND CENTER FOR HOUSING
RESOURCES, INC.'S RESPONSES TO CITY OF FRISCO'S SECOND SET OF
REQUESTS FOR INFORMATION AND REQUESTS FOR ADMISSION**

Frisco RFI 160: Please identify all facts, information, and understandings, including names and addresses of person from whom you obtained such information, from which you detail the assertions contained in the entry dated 7/1/2015 on Exhibit B.

RESPONSE:

Subject to Complainants' objections, pursuant to 16 Tex. Admin. Code § 22.144(c)(2)(E), please see documents produced in response to RFI Nos. 11, 12, 14, 15, and 118. Terri Anderson provided the information detailed in the entry dated 7/1/2015.

Prepared by/sponsored by: Terri Anderson
Authorized Representative of
ADC West Ridge, L.P. & Center for Housing Resources, Inc.

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

FORMAL COMPLAINT OF KER-SEVA LTD. AGAINST THE CITY OF FRISCO, TEXAS	§ § §	BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS
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**KER-SEVA, LTD., ADC WEST RIDGE VILLAS, L.P. AND CENTER FOR HOUSING
RESOURCES, INC.'S RESPONSES TO CITY OF FRISCO'S SECOND SET OF
REQUESTS FOR INFORMATION AND REQUESTS FOR ADMISSION**

Frisco RFI 161: For the entry dated 11/18/2015 on Exhibit B, please produce all documents that relate to any statement or assertion contained in said entry.

RESPONSE:

Subject to Complainants' objections, please see documents produced in response to RFI Nos. 11, 12, 14, 15, 118, 137, and 138.

Prepared by/sponsored by: Terri Anderson
Authorized Representative of
ADC West Ridge, L.P. & Center for Housing Resources, Inc.

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

FORMAL COMPLAINT OF KER-SEVA	§	BEFORE THE
LTD. AGAINST THE CITY OF FRISCO,	§	STATE OFFICE OF
TEXAS	§	ADMINISTRATIVE HEARINGS

**KER-SEVA, LTD., ADC WEST RIDGE VILLAS, L.P. AND CENTER FOR HOUSING
RESOURCES, INC.'S RESPONSES TO CITY OF FRISCO'S SECOND SET OF
REQUESTS FOR INFORMATION AND REQUESTS FOR ADMISSION**

Frisco RFI 162: Please identify all facts, information, and understandings , including names and addresses of person from whom you obtained such information, from which you detail the assertions contained in the entry dated 11/18/2015 on Exhibit B.

RESPONSE:

Subject to Complainants' objections, pursuant to 16 Tex. Admin. Code § 22.144(c)(2)(E), please see documents produced in response to RFI Nos. 11, 12, 14, 15, 118, 137, and 138. Terri Anderson provided the information detailed in the entry dated 11/18/2015.

Prepared by/sponsored by: Terri Anderson
Authorized Representative of
ADC West Ridge, L.P. & Center for Housing Resources, Inc.

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

FORMAL COMPLAINT OF KER-SEVA LTD. AGAINST THE CITY OF FRISCO, TEXAS	§ § §	BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS
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**KER-SEVA, LTD., ADC WEST RIDGE VILLAS, L.P. AND CENTER FOR HOUSING
RESOURCES, INC.'S RESPONSES TO CITY OF FRISCO'S SECOND SET OF
REQUESTS FOR INFORMATION AND REQUESTS FOR ADMISSION**

Frisco RFI 163: For the entry dated 12/23/2015 on Exhibit B, please produce all documents that relate to any statement or assertion contained in said entry.

RESPONSE:

Subject to Complainants' objections, please see documents produced in response to RFI Nos. 11, 12, 14, 15, 118, 137, and 138 and documents enclosed herein bates labeled ADC01703.

Prepared by/sponsored by: Terri Anderson
Authorized Representative of
ADC West Ridge, L.P. & Center for Housing Resources, Inc.

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

FORMAL COMPLAINT OF KER-SEVA LTD. AGAINST THE CITY OF FRISCO, TEXAS	§ § §	BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS
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**KER-SEVA, LTD., ADC WEST RIDGE VILLAS, L.P. AND CENTER FOR HOUSING
RESOURCES, INC.'S RESPONSES TO CITY OF FRISCO'S SECOND SET OF
REQUESTS FOR INFORMATION AND REQUESTS FOR ADMISSION**

Frisco RFI 164: Please identify all facts, information, and understandings, including names and addresses of person from whom you obtained such information, from which you detail the assertions contained in the entry dated 12/23/2015 on Exhibit B.

RESPONSE:

Subject to Complainants' objections, pursuant to 16 Tex. Admin. Code § 22.144(c)(2)(E), please see documents produced in response to RFI Nos. 11, 12, 14, 15, 118, 137, 138, and 163. Terri Anderson provided the information detailed in the entry dated 12/23/2015.

Prepared by/sponsored by: Terri Anderson
Authorized Representative of
ADC West Ridge, L.P. & Center for Housing Resources, Inc.

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

FORMAL COMPLAINT OF KER-SEVA LTD. AGAINST THE CITY OF FRISCO, TEXAS	§ § §	BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS
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**KER-SEVA, LTD., ADC WEST RIDGE VILLAS, L.P. AND CENTER FOR HOUSING
RESOURCES, INC.'S RESPONSES TO CITY OF FRISCO'S SECOND SET OF
REQUESTS FOR INFORMATION AND REQUESTS FOR ADMISSION**

Frisco RFI 165: For the entry dated 1/8/2016 on Exhibit B, please produce all documents that relate to any statement or assertion contained in said entry.

RESPONSE:

Subject to Complainants' objections, please see documents produced in response to RFI Nos. 11, 12, 14, 15, and 118.

Prepared by/sponsored by: Terri Anderson
Authorized Representative of
ADC West Ridge, L.P. & Center for Housing Resources, Inc.

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

FORMAL COMPLAINT OF KER-SEVA LTD. AGAINST THE CITY OF FRISCO, TEXAS	§ § §	BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS
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**KER-SEVA, LTD., ADC WEST RIDGE VILLAS, L.P. AND CENTER FOR HOUSING
RESOURCES, INC.'S RESPONSES TO CITY OF FRISCO'S SECOND SET OF
REQUESTS FOR INFORMATION AND REQUESTS FOR ADMISSION**

Frisco RFI 166 Please identify all facts, information , and understandings , including names and addresses of person from whom you obtained such information, from which you detail the assertions contained in the entry dated 1/8/2016 on Exhibit B.

RESPONSE:

Subject to Complainants' objections, pursuant to 16 Tex. Admin. Code § 22.144(c)(2)(E), please see documents produced in response to RFI Nos. 11, 12, 14, 15, and 118. Terri Anderson provided the information detailed in the entry dated 1/8/2016.

Prepared by/sponsored by: Terri Anderson
Authorized Representative of
ADC West Ridge, L.P. & Center for Housing Resources, Inc.

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

FORMAL COMPLAINT OF KER-SEVA LTD. AGAINST THE CITY OF FRISCO, TEXAS	§ § §	BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS
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**KER-SEVA, LTD., ADC WEST RIDGE VILLAS, L.P. AND CENTER FOR HOUSING
RESOURCES, INC.'S RESPONSES TO CITY OF FRISCO'S SECOND SET OF
REQUESTS FOR INFORMATION AND REQUESTS FOR ADMISSION**

Frisco RFI 167: For the entry dated 1/12/2016 on Exhibit B, please produce all documents that relate to any statement or assertion contained in said entry.

RESPONSE:

Subject to Complainants' objections, please see documents produced in response to RFI Nos. 11, 12, 14, 15, and 118.

Prepared by/sponsored by: Terri Anderson
Authorized Representative of
ADC West Ridge, L.P. & Center for Housing Resources, Inc.

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

FORMAL COMPLAINT OF KER-SEVA LTD. AGAINST THE CITY OF FRISCO, TEXAS	§ § §	BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS
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**KER-SEVA, LTD., ADC WEST RIDGE VILLAS, L.P. AND CENTER FOR HOUSING
RESOURCES, INC.'S RESPONSES TO CITY OF FRISCO'S SECOND SET OF
REQUESTS FOR INFORMATION AND REQUESTS FOR ADMISSION**

Frisco RFI 168: Please identify all facts, information , and understandings , including names and addresses of person from whom you obtained such information, from which you detail the assertions contained in the entry dated 1/12/2016 on Exhibit B.

RESPONSE:

Subject to Complainants' objections, pursuant to 16 Tex. Admin. Code § 22.144(c)(2)(E), please see documents produced in response to RFI Nos. 11, 12, 14, 15, and 118. Terri Anderson provided the information detailed in the entry dated 1/12/2016.

Prepared by/sponsored by: Terri Anderson
Authorized Representative of
ADC West Ridge, L.P. & Center for Housing Resources, Inc.

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

FORMAL COMPLAINT OF KER-SEVA LTD. AGAINST THE CITY OF FRISCO, TEXAS	§ § §	BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS
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**KER-SEVA, LTD., ADC WEST RIDGE VILLAS, L.P. AND CENTER FOR HOUSING
RESOURCES, INC.'S RESPONSES TO CITY OF FRISCO'S SECOND SET OF
REQUESTS FOR INFORMATION AND REQUESTS FOR ADMISSION**

Frisco RFI 169: For the entry dated 2/2/2016 on Exhibit B, please produce all documents that relate to any statement or assertion contained in said entry.

RESPONSE:

Subject to Complainants' objections, please see documents produced in response to RFI Nos. 11, 12, 14, 15, and 118.

Prepared by/sponsored by: Terri Anderson
Authorized Representative of
ADC West Ridge, L.P. & Center for Housing Resources, Inc.

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

FORMAL COMPLAINT OF KER-SEVA LTD. AGAINST THE CITY OF FRISCO, TEXAS	§ § §	BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS
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**KER-SEVA, LTD., ADC WEST RIDGE VILLAS, L.P. AND CENTER FOR HOUSING
RESOURCES, INC.'S RESPONSES TO CITY OF FRISCO'S SECOND SET OF
REQUESTS FOR INFORMATION AND REQUESTS FOR ADMISSION**

Frisco RFI 170: Please identify all facts, information, and understandings, including names and addresses of person from whom you obtained such information, from which you detail the assertions contained in the entry dated 2/2/2016 on Exhibit B.

RESPONSE:

Subject to Complainants' objections, pursuant to 16 Tex. Admin. Code § 22.144(c)(2)(E), please see documents produced in response to RFI Nos. 11, 12, 14, 15, and 118. Terri Anderson provided the information detailed in the entry dated 2/2/2016.

Prepared by/sponsored by: Terri Anderson
Authorized Representative of
ADC West Ridge, L.P. & Center for Housing Resources, Inc.

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

FORMAL COMPLAINT OF KER-SEVA LTD. AGAINST THE CITY OF FRISCO, TEXAS	§ § §	BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS
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**KER-SEVA, LTD., ADC WEST RIDGE VILLAS, L.P. AND CENTER FOR HOUSING
RESOURCES, INC.'S RESPONSES TO CITY OF FRISCO'S SECOND SET OF
REQUESTS FOR INFORMATION AND REQUESTS FOR ADMISSION**

Frisco RFI 171: For the entry dated 2/16/2016 on Exhibit B, please produce all documents that relate to any statement or assertion contained in said entry.

RESPONSE:

Subject to Complainants' objections, please see documents produced in response to RFI Nos. 11, 12, 14, 15, and 118.

Prepared by/sponsored by: Terri Anderson
Authorized Representative of
ADC West Ridge, L.P. & Center for Housing Resources, Inc.

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

FORMAL COMPLAINT OF KER-SEVA LTD. AGAINST THE CITY OF FRISCO, TEXAS	§ § §	BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS
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**KER-SEVA, LTD., ADC WEST RIDGE VILLAS, L.P. AND CENTER FOR HOUSING
RESOURCES, INC.'S RESPONSES TO CITY OF FRISCO'S SECOND SET OF
REQUESTS FOR INFORMATION AND REQUESTS FOR ADMISSION**

Frisco RFI 172: Please identify all facts, information, and understandings, including names and addresses of person from whom you obtained such information, from which you detail the assertions contained in the entry dated 2/16/2016 on Exhibit B.

RESPONSE:

Subject to Complainants' objections, pursuant to 16 Tex. Admin. Code § 22.144(c)(2)(E), please see documents produced in response to RFI Nos. 11, 12, 14, 15, and 118. Terri Anderson provided the information detailed in the entry dated 2/16/2016.

Prepared by/sponsored by: Terri Anderson
Authorized Representative of
ADC West Ridge, L.P. & Center for Housing Resources, Inc.

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

FORMAL COMPLAINT OF KER-SEVA LTD. AGAINST THE CITY OF FRISCO, TEXAS	§ § §	BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS
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**KER-SEVA, LTD., ADC WEST RIDGE VILLAS, L.P. AND CENTER FOR HOUSING
RESOURCES, INC.'S RESPONSES TO CITY OF FRISCO'S SECOND SET OF
REQUESTS FOR INFORMATION AND REQUESTS FOR ADMISSION**

Frisco RFI 173: For the entry dated 6/10/2016 on Exhibit B, please produce all documents that relate to any statement or assertion contained in said entry.

RESPONSE:

Subject to Complainants' objections, please see documents produced in response to RFI Nos. 11, 12, 14, 15, and 118.

Prepared by/sponsored by: Terri Anderson
Authorized Representative of
ADC West Ridge, L.P. & Center for Housing Resources, Inc.

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

FORMAL COMPLAINT OF KER-SEVA LTD. AGAINST THE CITY OF FRISCO, TEXAS	§ § §	BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS
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**KER-SEVA, LTD., ADC WEST RIDGE VILLAS, L.P. AND CENTER FOR HOUSING
RESOURCES, INC.'S RESPONSES TO CITY OF FRISCO'S SECOND SET OF
REQUESTS FOR INFORMATION AND REQUESTS FOR ADMISSION**

Frisco RFI 174: Please identify all facts, information, and understandings, including names and addresses of person from whom you obtained such information, from which you detail the assertions contained in the entry dated 6/10/2016 on Exhibit B.

RESPONSE:

Subject to Complainants' objections, pursuant to 16 Tex. Admin. Code § 22.144(c)(2)(E), please see documents produced in response to RFI Nos. 11, 12, 14, 15, and 118. Terri Anderson provided the information detailed in the entry dated 6/10/2016.

Prepared by/sponsored by: Terri Anderson
Authorized Representative of
ADC West Ridge, L.P. & Center for Housing Resources, Inc.

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

FORMAL COMPLAINT OF KER-SEVA LTD. AGAINST THE CITY OF FRISCO, TEXAS	§ § §	BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS
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**KER-SEVA, LTD., ADC WEST RIDGE VILLAS, L.P. AND CENTER FOR HOUSING
RESOURCES, INC.'S RESPONSES TO CITY OF FRISCO'S SECOND SET OF
REQUESTS FOR INFORMATION AND REQUESTS FOR ADMISSION**

Frisco RFI 175: For the entry dated 6/20/2016 on Exhibit B, please produce all documents that relate to any statement or assertion contained in said entry.

RESPONSE:

Subject to Complainants' objections, please see documents produced in response to RFI Nos. 11, 12, 14, 15; and 118.

Prepared by/sponsored by: Terri Anderson
Authorized Representative of
ADC West Ridge, L.P. & Center for Housing Resources, Inc.

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

FORMAL COMPLAINT OF KER-SEVA LTD. AGAINST THE CITY OF FRISCO, TEXAS	§ § §	BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS
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**KER-SEVA, LTD., ADC WEST RIDGE VILLAS, L.P. AND CENTER FOR HOUSING
RESOURCES, INC.'S RESPONSES TO CITY OF FRISCO'S SECOND SET OF
REQUESTS FOR INFORMATION AND REQUESTS FOR ADMISSION**

Frisco RFI 176: Please identify all facts, information, and understandings , including names and addresses of person from whom you obtained such information , from which you detail the assertions contained in the entry dated 6/20/2016 on Exhibit B.

RESPONSE:

Subject to Complainants' objections, pursuant to 16 Tex. Admin. Code § 22.144(c)(2)(E), please see documents produced in response to RFI Nos. 11, 12, 14, 15, and 118. Terri Anderson provided the information detailed in the entry dated 6/20/2016.

Prepared by/sponsored by: Terri Anderson
Authorized Representative of
ADC West Ridge, L.P. & Center for Housing Resources, Inc.

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

FORMAL COMPLAINT OF KER-SEVA LTD. AGAINST THE CITY OF FRISCO, TEXAS	§ § §	BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS
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**KER-SEVA, LTD., ADC WEST RIDGE VILLAS, L.P. AND CENTER FOR HOUSING
RESOURCES, INC.'S RESPONSES TO CITY OF FRISCO'S SECOND SET OF
REQUESTS FOR INFORMATION AND REQUESTS FOR ADMISSION**

Frisco RFI 177: For the entry dated 6/21/2016 on Exhibit B, please produce all documents that relate to any statement or assertion contained in said entry.

RESPONSE:

Subject to Complainants' objections, please see documents produced in response to RFI Nos. 11, 12, 14, 15, and 118.

Prepared by/sponsored by: Terri Anderson
Authorized Representative of
ADC West Ridge, L.P. & Center for Housing Resources, Inc.

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

FORMAL COMPLAINT OF KER-SEVA LTD. AGAINST THE CITY OF FRISCO, TEXAS	§ § §	BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS
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**KER-SEVA, LTD., ADC WEST RIDGE VILLAS, L.P. AND CENTER FOR HOUSING
RESOURCES, INC.'S RESPONSES TO CITY OF FRISCO'S SECOND SET OF
REQUESTS FOR INFORMATION AND REQUESTS FOR ADMISSION**

Frisco RFI 178: Please identify all facts, information, and understandings , including names and addresses of person from whom you obtained such information , from which you detail the assertions contained in the entry dated 6/21/2016 on Exhibit B.

RESPONSE:

Subject to Complainant's objections, pursuant to 16 Tex. Admin. Code § 22.144(c)(2)(E), please see documents produced in response to RFI Nos. 11, 12, 14, 15, and 118. Terri Anderson provided the information detailed in the entry dated 6/21/2016.

Prepared by/sponsored by: Terri Anderson
Authorized Representative of
ADC West Ridge, L.P. & Center for Housing Resources, Inc.

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

FORMAL COMPLAINT OF KER-SEVA LTD. AGAINST THE CITY OF FRISCO, TEXAS .	§ § §	BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS
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**KER-SEVA, LTD., ADC WEST RIDGE VILLAS, L.P. AND CENTER FOR HOUSING
RESOURCES, INC.'S RESPONSES TO CITY OF FRISCO'S SECOND SET OF
REQUESTS FOR INFORMATION AND REQUESTS FOR ADMISSION**

Frisco RFI 179: For the entry dated 6/23/2016 on Exhibit B, please produce all documents that relate to any statement or assertion contained in said entry.

RESPONSE:

Subject to Complainants' objections, please see documents produced in response to RFI Nos. 11, 12, 14, 15, and 118.

Prepared by/sponsored by: Terri Anderson
Authorized Representative of
ADC West Ridge, L.P. & Center for Housing Resources, Inc.

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

FORMAL COMPLAINT OF KER-SEVA LTD. AGAINST THE CITY OF FRISCO, TEXAS	§ § §	BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS
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**KER-SEVA, LTD., ADC WEST RIDGE VILLAS, L.P. AND CENTER FOR HOUSING
RESOURCES, INC.'S RESPONSES TO CITY OF FRISCO'S SECOND SET OF
REQUESTS FOR INFORMATION AND REQUESTS FOR ADMISSION**

Frisco RFI 180: Please identify all facts, information, and understandings, including names and addresses of person from whom you obtained such information, from which you detail the assertions contained in the entry dated 6/23/2016 on Exhibit B.

RESPONSE:

Subject to Complainants' objections, pursuant to 16 Tex. Admin. Code §22.144(c)(2)(E), please see documents produced in response to RFI Nos. 11, 12, 14, 15, and 118. Terri Anderson provided the information detailed in the entry dated 6/23/2016.

Prepared by/sponsored by: Terri Anderson
Authorized Representative of
ADC West Ridge, L.P. & Center for Housing Resources, Inc.

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

FORMAL COMPLAINT OF KER-SEVA LTD. AGAINST THE CITY OF FRISCO, TEXAS	§ § §	BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS
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**KER-SEVA, LTD., ADC WEST RIDGE VILLAS, L.P. AND CENTER FOR HOUSING
RESOURCES, INC.'S RESPONSES TO CITY OF FRISCO'S SECOND SET OF
REQUESTS FOR INFORMATION AND REQUESTS FOR ADMISSION**

Frisco RFI 181: For the entries dated 6/24/2016 on Exhibit B, please produce all documents that relate to any statement or assertion contained in said entry.

RESPONSE:

Subject to Complainants' objections, please see documents produced in response to RFI Nos. 11, 12, 14, 15, and 118.

Prepared by/sponsored by: Terri Anderson
Authorized Representative of
ADC West Ridge, L.P. & Center for Housing Resources, Inc.

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

FORMAL COMPLAINT OF KER-SEVA LTD. AGAINST THE CITY OF FRISCO, TEXAS	§ § §	BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS
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**KER-SEVA, LTD., ADC WEST RIDGE VILLAS, L.P. AND CENTER FOR HOUSING
RESOURCES, INC.'S RESPONSES TO CITY OF FRISCO'S SECOND SET OF
REQUESTS FOR INFORMATION AND REQUESTS FOR ADMISSION**

Frisco RFI 182: Please identify all facts, information, and understandings, including names and addresses of person from whom you obtained such information, from which you detail the assertions contained in the entries dated 6/24/2016 on Exhibit B.

RESPONSE:

Subject to Complainants' objections, pursuant to 16 Tex. Admin. Code § 22.144(c)(2)(E), please see documents produced in response to RFI Nos. 11, 12, 14, 15, and 118. Terri Anderson provided the information detailed in the entry dated 6/24/2016.

Prepared by/sponsored by: Terri Anderson
Authorized Representative of
ADC West Ridge, L.P. & Center for Housing Resources, Inc.

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

FORMAL COMPLAINT OF KER-SEVA LTD. AGAINST THE CITY OF FRISCO, TEXAS	§ § §	BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS
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**KER-SEVA, LTD., ADC WEST RIDGE VILLAS, L.P. AND CENTER FOR HOUSING
RESOURCES, INC.'S RESPONSES TO CITY OF FRISCO'S SECOND SET OF
REQUESTS FOR INFORMATION AND REQUESTS FOR ADMISSION**

Frisco RFI 183: For the entries dated 6/28/2016 on Exhibit B, please produce all documents that relate to any statement or assertion contained in said entry.

RESPONSE:

Subject to Complainants' objections, please see documents produced in response to RFI Nos. 11, 12, 14, 15, and 118.

Prepared by/sponsored by: Terri Anderson
Authorized Representative of
ADC West Ridge, L.P. & Center for Housing Resources, Inc.

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

FORMAL COMPLAINT OF KER-SEVA LTD. AGAINST THE CITY OF FRISCO, TEXAS	§ § §	BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS
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**KER-SEVA, LTD., ADC WEST RIDGE VILLAS, L.P. AND CENTER FOR HOUSING
RESOURCES, INC.'S RESPONSES TO CITY OF FRISCO'S SECOND SET OF
REQUESTS FOR INFORMATION AND REQUESTS FOR ADMISSION**

Frisco RFI 184 Please identify all facts, information, and understandings , including names and addresses of person from whom you obtained such information , from which you detail the assertions contained in the entries dated 6/28/2016 on Exhibit B.

RESPONSE:

Subject to Complainants' objections, pursuant to 16 Tex. Admin. Code § 22.144(c)(2)(E), please see documents produced in response to RFI Nos. 11, 12, 14, 15, and 118. Terri Anderson provided the information detailed in the entry dated 6/24/2016.

Prepared by/sponsored by: Terri Anderson
Authorized Representative of
ADC West Ridge, L.P. & Center for Housing Resources, Inc.

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

FORMAL COMPLAINT OF KER-SEVA LTD. AGAINST THE CITY OF FRISCO, TEXAS	§ § §	BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS
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**KER-SEVA, LTD., ADC WEST RIDGE VILLAS, L.P. AND CENTER FOR HOUSING
RESOURCES, INC.'S RESPONSES TO CITY OF FRISCO'S SECOND SET OF
REQUESTS FOR INFORMATION AND REQUESTS FOR ADMISSION**

Frisco RFI 185: For the entry dated 8/31/2016 on Exhibit B, please produce all documents that relate to any statement or assertion contained in said entry.

RESPONSE:

Subject to Complainants' objections, please see documents produced in response to RFI Nos. 11, 12, 14, 15, and 118.

Prepared by/sponsored by: Terri Anderson
Authorized Representative of
ADC West Ridge, L.P. & Center for Housing Resources, Inc.

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

FORMAL COMPLAINT OF KER-SEVA	§	BEFORE THE
LTD. AGAINST THE CITY OF FRISCO,	§	STATE OFFICE OF
TEXAS	§	ADMINISTRATIVE HEARINGS

**KER-SEVA, LTD., ADC WEST RIDGE VILLAS, L.P. AND CENTER FOR HOUSING
RESOURCES, INC.'S RESPONSES TO CITY OF FRISCO'S SECOND SET OF
REQUESTS FOR INFORMATION AND REQUESTS FOR ADMISSION**

Frisco RFI 186: Please identify all facts, information, and understandings, including names and addresses of person from whom you obtained such information , from which you detail the assertions contained in the entry dated 8/31/2016 on Exhibit B.

RESPONSE:

Subject to Complainants' objections, pursuant to 16 Tex. Admin. Code § 22.144(c)(2)(E), please see documents produced in response to RFI Nos. 11, 12, 14, 15, and 118. Terri Anderson provided the information detailed in the entry dated 8/31/2016.

Prepared by/sponsored by: Terri Anderson
Authorized Representative of
ADC West Ridge, L.P. & Center for Housing Resources, Inc.

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

FORMAL COMPLAINT OF KER-SEVA LTD. AGAINST THE CITY OF FRISCO, TEXAS	§ § §	BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS
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**KER-SEVA, LTD., ADC WEST RIDGE VILLAS, L.P. AND CENTER FOR HOUSING
RESOURCES, INC.'S RESPONSES TO CITY OF FRISCO'S SECOND SET OF
REQUESTS FOR INFORMATION AND REQUESTS FOR ADMISSION**

Frisco RFI 187: For the entry dated 9/14/2016 on Exhibit B, please produce all documents that relate to any statement or assertion contained in said entry.

RESPONSE:

Subject to Complainants' objections, please see documents produced in response to RFI Nos. 11, 12, 14, 15, 118, and 120.

Prepared by/sponsored by: Terri Anderson
Authorized Representative of
ADC West Ridge, L.P. & Center for Housing Resources, Inc.

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

FORMAL COMPLAINT OF KER-SEVA LTD. AGAINST THE CITY OF FRISCO, TEXAS	§ § §	BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS
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**KER-SEVA, LTD., ADC WEST RIDGE VILLAS, L.P. AND CENTER FOR HOUSING
RESOURCES, INC.'S RESPONSES TO CITY OF FRISCO'S SECOND SET OF
REQUESTS FOR INFORMATION AND REQUESTS FOR ADMISSION**

Frisco RFI 188: Please identify all facts, information, and understandings, including names and addresses of person from whom you obtained such information, from which you detail the assertions contained in the entry dated 9/14/2016 on Exhibit B.

RESPONSE:

Subject to Complainants' objections, pursuant to 16 Tex. Admin. Code § 22.144(c)(2)(E), please see documents produced in response to RFI Nos. 11, 12, 14, 15, 118, and 120. Terri Anderson provided the information detailed in the entry dated 9/14/2016.

Prepared by/sponsored by: Terri Anderson
Authorized Representative of
ADC West Ridge, L.P. & Center for Housing Resources, Inc.

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

FORMAL COMPLAINT OF KER-SEVA LTD. AGAINST THE CITY OF FRISCO, TEXAS	§ § §	BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS
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**KER-SEVA, LTD., ADC WEST RIDGE VILLAS, L.P. AND CENTER FOR HOUSING
RESOURCES, INC.'S RESPONSES TO CITY OF FRISCO'S SECOND SET OF
REQUESTS FOR INFORMATION AND REQUESTS FOR ADMISSION**

Frisco RFI 189: For the entry dated 10/6/2016 on Exhibit B, please produce all documents that relate to any statement or assertion contained in said entry.

RESPONSE:

Subject to Complainants' objections, please see documents produced in response to RFI Nos. 11, 12, 14, 15, 118, 119, and 120.

Prepared by/sponsored by: Terri Anderson
Authorized Representative of
ADC West Ridge, L.P. & Center for Housing Resources, Inc.

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

FORMAL COMPLAINT OF KER-SEVA LTD. AGAINST THE CITY OF FRISCO, TEXAS	§ § §	BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS
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**KER-SEVA, LTD., ADC WEST RIDGE VILLAS, L.P. AND CENTER FOR HOUSING
RESOURCES, INC.'S RESPONSES TO CITY OF FRISCO'S SECOND SET OF
REQUESTS FOR INFORMATION AND REQUESTS FOR ADMISSION**

Frisco RFI 190: Please identify all facts, information, and understandings, including names and addresses of person from whom you obtained such information, from which you detail the assertions contained in the entry dated 10/6/2016 on Exhibit B.

RESPONSE:

Subject to Complainants' objections, pursuant to 16 Tex. Admin. Code § 22.144(c)(2)(E), please see documents produced in response to RFI Nos. 11, 12, 14, 15, 118, 119, and 120. Terri Anderson provided the information detailed in the entry dated 10/6/2016.

Prepared by/sponsored by: Terri Anderson
Authorized Representative of
ADC West Ridge, L.P. & Center for Housing Resources, Inc.

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

FORMAL COMPLAINT OF KER-SEVA LTD. AGAINST THE CITY OF FRISCO, TEXAS	§ § §	BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS
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**KER-SEVA, LTD., ADC WEST RIDGE VILLAS, L.P. AND CENTER FOR HOUSING
RESOURCES, INC.'S RESPONSES TO CITY OF FRISCO'S SECOND SET OF
REQUESTS FOR INFORMATION AND REQUESTS FOR ADMISSION**

Frisco RFI 191: For the entry dated 6/26/2007 on Exhibit B, please produce all documents that relate to any statement or assertion contained in said entry.

RESPONSE:

Subject to Complainants' objections, please see documents produced in response to RFI Nos. 11, 12, 14, 15, and 118.

Prepared by/sponsored by: Terri Anderson
Authorized Representative of
ADC West Ridge, L.P. & Center for Housing Resources, Inc.

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

FORMAL COMPLAINT OF KER-SEVA LTD. AGAINST THE CITY OF FRISCO, TEXAS	§ § §	BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS
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**KER-SEVA, LTD., ADC WEST RIDGE VILLAS, L.P. AND CENTER FOR HOUSING
RESOURCES, INC.'S RESPONSES TO CITY OF FRISCO'S SECOND SET OF
REQUESTS FOR INFORMATION AND REQUESTS FOR ADMISSION**

Frisco RFI 192: Please identify all facts, information, and understandings, including names and addresses of person from whom you obtained such information, from which you detail the assertions contained in the entry dated 6/26/2007 on Exhibit B.

RESPONSE:

Subject to Complainants' objections, pursuant to 16 Tex. Admin. Code § 22.144(c)(2)(E), please see documents produced in response to RFI Nos. 11, 12, 14, 15, and 118. Terri Anderson provided the information detailed in the entry dated 6/26/2007.

Prepared by/sponsored by: Terri Anderson
Authorized Representative of
ADC West Ridge, L.P. & Center for Housing Resources, Inc.

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

FORMAL COMPLAINT OF KER-SEVA LTD. AGAINST THE CITY OF FRISCO, TEXAS	§ § §	BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS
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**KER-SEVA, LTD., ADC WEST RIDGE VILLAS, L.P. AND CENTER FOR HOUSING
RESOURCES, INC.'S RESPONSES TO CITY OF FRISCO'S SECOND SET OF
REQUESTS FOR INFORMATION AND REQUESTS FOR ADMISSION**

Frisco RFI 193: For the entry dated 11/7/2001 on Exhibit B, please produce all documents that relate to any statement or assertion contained in said entry.

RESPONSE:

Subject to Complainants' objections, please see documents produced in response to RFI Nos. 11, 12, 14, 15, and 118.

Prepared by/sponsored by: Terri Anderson
Authorized Representative of
ADC West Ridge, L.P. & Center for Housing Resources, Inc.

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

FORMAL COMPLAINT OF KER-SEVA LTD. AGAINST THE CITY OF FRISCO, TEXAS	§ § §	BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS
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**KER-SEVA, LTD., ADC WEST RIDGE VILLAS, L.P. AND CENTER FOR HOUSING
RESOURCES, INC.'S RESPONSES TO CITY OF FRISCO'S SECOND SET OF
REQUESTS FOR INFORMATION AND REQUESTS FOR ADMISSION**

Frisco RFI 194: Please identify all facts, information, and understandings, including names and addresses of person from whom you obtained such information, from which you detail the assertions contained in the entry dated 11/7/2001 on Exhibit B.

RESPONSE:

Subject to Complainants' objections, pursuant to 16 Tex. Admin. Code § 22.144(c)(2)(E), please see documents produced in response to RFI Nos. 11, 12, 14, 15, and 118. Terri Anderson provided the information detailed in the entry dated 11/7/2001.

Prepared by/sponsored by: Terri Anderson
Authorized Representative of
ADC West Ridge, L.P. & Center for Housing Resources, Inc.

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

FORMAL COMPLAINT OF KER-SEVA LTD. AGAINST THE CITY OF FRISCO, TEXAS	§ § §	BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS
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**KER-SEVA, LTD., ADC WEST RIDGE VILLAS, L.P. AND CENTER FOR HOUSING
RESOURCES, INC.'S RESPONSES TO CITY OF FRISCO'S SECOND SET OF
REQUESTS FOR INFORMATION AND REQUESTS FOR ADMISSION**

Frisco RFA 8: Admit that the Annexation Agreement identified as Exhibit C is expired.

RESPONSE:

This Request is subject to an objection by Complainants.

Prepared/Sponsored by: To be supplemented

