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FORMAL COMPLAINT OF KER-SEVA  
LTD. AGAINST 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 FOURTH SET OF REQUESTS FOR INFORMATION**

ADC West Ridge, L.P. and Center for Housing Resources, Inc. file these Responses to City of Frisco's ("Frisco") Fourth Set of Requests for Information ("RFI"), which was filed with the Public Utility Commission of Texas and served on ADC West Ridge, L.P. and Center for Housing Resources, Inc. on November 8, 2016. These responses are timely filed. ADC West Ridge, L.P. and Center for Housing Resources, Inc. ("Complainants") agree and stipulate that all parties may treat these responses as if the answers were filed under oath.

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  
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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 28th 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**

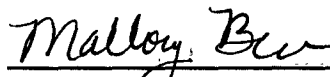
*Via email and U.S. First Class Mail*

Richard Abernathy  
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**Attorney for City of Frisco**

*Via email and U.S. First Class Mail*

Sam Chang  
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**Attorney for Public Utility Commission of Texas**

*Via email and U.S. First Class Mail*

  
\_\_\_\_\_  
Mallory Beck

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FORMAL COMPLAINT OF KER-SEVA	§	BEFORE THE
LTD. AGAINST 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 FOURTH SET OF REQUESTS FOR INFORMATION**

**Frisco RFI 239:** Please provide all contracts, agreements, emails, letters or memorandum of understandings, communications, and other commitments between you and any other party for construction, development, permitting, designing, or any other activity on Lot 2.

**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. and Center for Housing Resources, Inc.

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

<b>FORMAL COMPLAINT OF KER-SEVA LTD. AGAINST CITY OF FRISCO, TEXAS</b>	§ § §	<b>BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS</b>
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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 FOURTH SET OF REQUESTS FOR INFORMATION**

**Frisco RFI 240:** Please list all contractors, experts, or other individual or entity with whom you have communicated regarding the construction, development, permitting, designing, or any other activity on Lot 2.

**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. and Center for Housing Resources, Inc.