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FORMAL COMPLAINT OF  
ADC WEST RIDGE, L.P. AND  
CENTER FOR HOUSING  
RESOURCES, INC. AGAINST THE  
CITY OF FRISCO

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§

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

**AMENDED 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 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 Jackson Walker L.L.P., 100 Congress Avenue, Suite 1100, Austin, Texas 78701 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: 

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 2233

F: (512) 391-2112

ATTORNEYS FOR COMPLAINANTS  
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 1st day of December 2016:

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

Art Rodriguez  
Russell & Rodriguez, L.L.P.  
1633 Williams Drive, Building 2, Suite 200  
Georgetown, Texas 78268  
arodriguez@txadminlaw.com

***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  
Attorneys for City of Frisco

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

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

  
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Ali Abazari