



Control Number: 45870



Item Number: 95

Addendum StartPage: 0

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

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

BEFORE THE STATE OFFICE OF
ADMINISTRATIVE HEARINGS

REQUEST FOR SUBPOENA

TO THE HONORABLE ADMINISTRATIVE LAW JUDGES:

The City of Frisco ("Frisco") files this Request for Subpoena pursuant to Public Utility Commission ("PUC") Procedural Rule 22.145. Frisco hereby requests a subpoena to take the deposition of Joe Thomason.¹ Mr. Thomason's employer, Weir Brothers Contracting, LLC, is listed by ADC West Ridge, LP and Center for Housing Resources, Inc.² as persons having employees with knowledge of relevant facts.³ When the undersigned counsel asked counsel for Complainants who is the responsible individual for the work at the subject property, Complainants provided Mr. Thomason's name. Frisco sought to secure his attendance at a deposition from counsel for Complainants as counsel for Complainants is listed as the primary contact person for Weir Brothers Contracting, LLC. Counsel for Complainants indicated that Mr. Thomason is not within their control despite Complainants' counsel being the sole contact person for Weir Brothers Contracting, LLC. Complainants list Weir Brothers Contracting, LLC employees as having knowledge of relevant facts. Mr. Thomason is apparently the person responsible for the company's activities at the property that is the subject of this proceeding. Therefore, the City cannot extract his knowledge from another source and, as such, good cause

¹ A copy of the requested subpoena for issuance is contained in Exhibit A, attached hereto.

² ADC West Ridge, LP and Center for Housing Resources, Inc. are collectively referred to herein as "Complainants."

³ See Exhibit B.

95

of issuance of the requested subpoenas is demonstrated. Frisco, thus, seeks this request for subpoena utilizing the form prescribed by SOAH:

Party Requesting:

City of Frisco

Date of Request:

December 5, 2016

Telephone Number:

(512) 930-1317 (Counsel for Frisco)
(512) 236-2000 (Deponents)

SOAH Docket No. and Style of Case:

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

Witnesses to be Subpoenaed: Joe Thomason

Address and/or Probable location:

Weir Brothers Contracting, LLC
10721 Luna Rd.
Dallas, Texas 75220

1. Have the witnesses been asked to appear at the deposition? Yes. Frisco requested that Complainants produce the witness for deposition as counsel for Complainants is listed as the contact person. Complaints indicated that they were unable to produce the witness.

2. Explain the relevance of the witness' testimony and/or documents. Employees of Weir Brothers Contracting, LLC have been listed as persons with knowledge of relevant facts by Complainants. Mr. Thomason is apparently responsible for the work at the subject property. The provision of water and sewer service is one of the central issues in this proceeding. Complainants indicate that Weir Brothers Contracting, LLC has knowledge of "communications with the City of Frisco officials regarding the provision of water for construction at [the subject property]." ⁴ Frisco needs to inquire about the relevant facts that Mr. Thomason purportedly possesses.

3. Is the information requested of the witness available from another source. No.

Is the witness an expert? No.

4. Estimate the number of days that this witness will be needed: One day.

5. Estimate the total travel mileage from the witness' residence to the deposition location:

⁴ See Exhibit B at 6.

Frisco has no knowledge of the witnesses' residences, but did list the address from their place of employment above. For the convenience of the witnesses, Frisco is willing to depose the witnesses at the offices of its co-counsel at:

Abernathy Roeder Boyd & Hullett, P.C.
1700 Redbud Blvd., Suite 300
McKinney, Texas 75069

For Mr. Thomas, the total travel mileage is approximately 34 miles from his place of employment.

6. Witness fee. The City tenders \$32.80 witness fee for the witness, which includes a \$10 witness fee, \$7.80 mileage reimbursement, and \$15.00 meal expense amount, pursuant to Tex. Gov't. Code § 2001.105.

7. What date is the date and time of the deposition:

January 12, 2017, at 9:00 a.m.

8. List the documents you would like the witness to produce:

The City seeks the following documents:

- a. His current resume or bibliography.
- b. All documents, tangible things, reports, models, or data compilations that have been provided to, reviewed by, or prepared by or for Mr. Thomason, in anticipation of his testimony.
- c. All documents, including but not limited to, any and all reports, notes, contracts, agreements, memorandum, communications, electronic mail, texts, or other correspondence pertaining to the property located in the extraterritorial jurisdiction of the City of Frisco with the address of 9331 Westridge Boulevard in Collin County, Texas.
- d. All documents reflecting communications between you and Ker-Seva Ltd., concerning the property located in the extraterritorial jurisdiction of the City of Frisco with the address of 9331 Westridge Boulevard in Collin County, Texas.
- e. All documents reflecting communications between you and ADC West Ridge, LP, concerning the property located in the extraterritorial jurisdiction of the City of Frisco with the address of 9331 Westridge Boulevard in Collin County, Texas.
- f. All documents reflecting communications between you and Center for Housing Resources, Inc., concerning the property located in the extraterritorial jurisdiction of the City of Frisco with the address of 9331 Westridge Boulevard in Collin County, Texas.

- g. All documents reflecting communications between you and any other person or entity, including the cities of McKinney and Frisco and the county of Collin, concerning the property located in the extraterritorial jurisdiction of the City of Frisco with the address of 9331 Westridge Boulevard in Collin County, Texas.

The City respectfully requests the issuance of the subpoenas as requested above.

Respectfully submitted,

Russell & Rodriguez, L.L.P.
1633 Williams Drive, Building 2, Suite 200
Georgetown, Texas 78628
(512) 930-1317
(866) 929-1641 (Fax)

Abernathy Roeder Boyd & Hullett, P.C.
Richard Abernathy
State Bar No. 00809500
1700 Redbud Blvd., Suite 300
McKinney, Texas 75069
(214) 544-4000
(214) 544-4040 (Fax)

/s/ Arturo D. Rodriguez, Jr.
ARTURO D. RODRIGUEZ, JR.
State Bar No. 00791551

ATTORNEYS FOR THE CITY OF FRISCO

CERTIFICATE OF SERVICE

I hereby certify that on this 5th day of December, 2016, a true and correct copy of the foregoing document has been sent via facsimile, first class mail, or hand-delivered to the following counsel of record:

State Office of Administrative Hearings
300 West 15th Street, Suite 502
Austin, Texas 78701
(512) 475-4993
(512) 322-2061 Fax

Meitra Farhadi
Administrative Law Judge
State Office of Administrative Hearings
300 West 15th St., Suite 502
Austin, Texas 78701
(512) 475-4993
(512) 322-2061- *Via Facsimile*

Mr. Sam Chang
Public Utility Commission of Texas
1701 N. Congress Avenue
Austin, Texas
(512) 936-7261
Via Electronic Mail

Mr. Ali Abazari
Ms. Mallory Beck
Jackson Walker, LLP
100 Congress Avenue, Suite 1100
Austin, Texas 78701
(512) 236-2000
Via Electronic Mail

William G. Newchurch
Administrative Law Judge
State Office of Administrative Hearings 300
West 15th St., Suite 502
Austin, Texas 78701
(512) 475-4993
(512) 322-2061- *Via Facsimile*

/s/ Arturo D. Rodriguez, Jr.
ARTURO D. RODRIGUEZ, JR.

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

FORMAL COMPLAINT OF	§	BEFORE THE STATE OFFICE OF
ADC WEST RIDGE L.P., AND	§	
CENTER FOR HOUSING RESOURCES,	§	
INC. AGAINST THE CITY OF FRISCO	§	ADMINISTRATIVE HEARINGS

SUBPOENA

TO: ANY SHERIFF OR CONSTABLE OF THE STATE OF TEXAS, OR TO ANY OTHER PERSON WHO IS NOT A PARTY AND IS NOT LESS THAN EIGHTEEN YEARS OF AGE

GREETINGS: You are hereby authorized, commanded, and required, pursuant to TEX GOV'T CODE ANN § 2001.089 and the Rules of Procedure of the Public Utility Commission of Texas to summon Joe Thomason, who may be found at 10721 Luna Rd., Dallas, Texas 75220, to appear before a court reporter, at the offices of Abernathy Roeder Boyd & Hullett, P.C., 1700 Redbud Blvd., Suite 300, McKinney, Texas 75069 at 9:00 a.m. on January 12, 2017, in order to give deposition as a witness in the above styled administrative proceeding, to attend from day to day until lawfully discharged.

SAID ABOVE NAMED WITNESS IS FURTHER COMMANDED to produce at said time and place set forth above, the following books, papers, documents, or other tangible things, to wit:

- a. His current resume or bibliography.
- b. All documents, tangible things, reports, models, or data compilations that have been provided to, reviewed by, or prepared by or for Joe Thomason, in anticipation of his testimony.
- c. All documents, including but not limited to, any and all reports, notes, contracts, agreements, memorandum, communications, electronic mail, texts, or other correspondence pertaining to the property located in the extraterritorial jurisdiction of the City of Frisco with the address of 9331 Westridge Boulevard in Collin County, Texas.

Exhibit A

- d. All documents reflecting communications between you and Ker-Seva Ltd., concerning the property located in the extraterritorial jurisdiction of the City of Frisco with the address of 9331 Westridge Boulevard in Collin County, Texas.
- e. All documents reflecting communications between you and ADC West Ridge, LP, concerning the property located in the extraterritorial jurisdiction of the City of Frisco with the address of 9331 Westridge Boulevard in Collin County, Texas.
- f. All documents reflecting communications between you and Center for Housing Resources, Inc., concerning the property located in the extraterritorial jurisdiction of the City of Frisco with the address of 9331 Westridge Boulevard in Collin County, Texas.
- g. All documents reflecting communications between you and any other person or entity, including the cities of McKinney and Frisco and the county of Collin, concerning the property located in the extraterritorial jurisdiction of the City of Frisco with the address of 9331 Westridge Boulevard in Collin County, Texas.

DO NOT FAIL to return this writ to said Administrative Law Judge, with return thereon, showing the manner of execution

Issued this _____ day of _____, 2016, at the request of Arturo D. Rodriguez, Jr., Attorney for Applicant, City of Frisco, in said proceeding.

MEITRA FARHADI or
WILLIAM G. NEWCHURCH
ADMINISTRATIVE LAW JUDGE
STATE OFFICE OF ADMINISTRATIVE
HEARINGS

RETURN OF SERVICE

Came to hand on the _____ day of _____ 2016, at _____ o' clock _____ .m.

Executed at _____, within the County of _____, at _____ o'clock _____ .m. on the _____ day of _____ 2016, by delivering to the within named witness, _____, in person, a true copy of this subpoena.

To certify which witness my hand officially.

SHERIFF/CONSTABLE/AUTHORIZED PERSON
_____ County, Texas

CERTIFICATE OF SERVICE

I hereby certify that on this 5th day of December, 2016, a true and correct copy of the foregoing document has been sent via facsimile, first class mail, or hand-delivered to the following counsel of record:

State Office of Administrative Hearings
300 West 15th Street, Suite 502
Austin, Texas 78701
(512) 475-4993
(512) 322-2061 Fax

William G. Newchurch
Administrative Law Judge
State Office of Administrative
Hearings 300 West 15th St., Suite
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Austin, Texas 78701
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Mr. Sam Chang
Public Utility Commission of Texas
1701 N. Congress Avenue
Austin, Texas
(512) 936-7261
Via Electronic Mail

Meitra Farhadi
Administrative Law Judge
State Office of Administrative
Hearings 300 West 15th St., Suite
502
Austin, Texas 78701
(512) 475-4993
(512) 322-2061- *Via Facsimile*

Mr. Leonard Dougal
Mr. Ali Abazari
Ms. Mallory Beck
Jackson Walker, LLP
100 Congress Avenue, Suite 1100
Austin, Texas 78701
(512) 236-2000
Via Electronic Mail

/s/ Arturo D. Rodriguez, Jr.
ARTURO D. RODRIGUEZ, JR.

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

FORMAL COMPLAINT OF KER-SEVA LTD., ADC WEST RIDGE VILLAS, L.P., AND CENTER FOR HOUSING RESOURCES, INC. AGAINST THE CITY OF FRISCO, TEXAS	§ § § § §	BEFORE THE PUBLIC UTILITY COMMISSION OF TEXAS
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COMPLAINANTS' ORDER NO. 3 RESPONSE TO RULE 194.2

TO: SERVICE LIST

COMES NOW, Complainants Ker-Seva Ltd., ADC West Ridge Villas, L.P., and Center for Housing Resources, Inc. (collectively, "Complainants"), and file this their Rule 194.2 Disclosures pursuant to Tex. R. Civ. P. 194.2, 16 Tex. Admin. Code § 22.144(c) and (j), and Order No. 3 in this docket. Discovery is ongoing, and Complainants reserve the right to supplement and amend the responses contained herein.

Respectfully submitted,

JACKSON WALKER L.L.P.

By: /s/ 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
KER-SEVA, LTD., ADC WEST RIDGE
VILLAS L.P., AND CENTER FOR HOUSING
RESOURCES, INC.

CERTIFICATE OF SERVICE

I hereby certify that the above and foregoing document was served as shown below on
this 19th day of August 2016:

Art Rodriguez
Russell & Rodriguez, L.L.P.
1633 Williams Dr., Bldg. 2, Suite 200
Georgetown, Texas 78268
T: (512) 930-1317
F: (866) 929-1641
arodriguez@txadminlaw.com
Attorney for City of Frisco RFI

Via email

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

William G. Newchurch
Administrative Law Judge
State Office of Administrative Hearings
300 West 15th St., Suite 502
Austin, Texas 78701
(512) 475-4993
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Via Facsimile (512) 322-2061

Meitra Farhadi
Administrative Law Judge
State Office of Administrative Hearings
300 West 15th St., Suite 502
Austin, Texas 78701
(512) 475-4993
(512) 322-2061- Fax

Via Facsimile (512) 322-2061

/s/ Mallory Beck
Mallory Beck

REQUESTS FOR DISCLOSURE

Request 194.2(a): The correct names of the parties to this proceeding;

Response: Complainants believe that the parties have been identified properly as listed in Order No. 3.

Request 194.2(b): The name, address, and telephone number of any potential parties;

Response: Complainants believe that all potential parties have been named and admitted as parties.

Request 194.2(c): The legal theories and, in general, the factual bases of the responding party's claims or defenses (the responding party need not marshal all evidence that may be offered at trial);

Response: The City of Frisco, Texas, holds water certificate of convenience and necessity ("CCN") No. 11772 and sewer CCN No. 20591 which covers certain property owned by Complainants. As the holder of the CCNs, Frisco has a statutory duty to provide continuous and adequate service to its CCN areas. Pursuant to PUC rules, Frisco has a duty to provide continuous and adequate service to every qualified service applicant within its CCN areas. Complainants are qualified service applicants. Complainants have submitted completed applications for water and sewer service to Frisco. Frisco has denied such service by refusing to allow Complainants to use existing infrastructure belonging to Frisco which has the capacity to serve Complainants. Frisco has refused to provide service within the time required by PUC Rule 24.85. Alternatively, Frisco has denied service because Frisco has not identified the construction required and the expected date of service. The construction Frisco is currently stating is required constitutes an effective denial of service. Frisco has also denied service by refusing to allow Complainants to obtain any water for construction from Frisco. The factual bases will be pre-filed and submitted in this matter pursuant to Order No. 3 or any succeeding applicable order..

Discovery is ongoing and Complainants reserve the right to amend and supplement these responses, including the factual bases and legal theories stated herein.

Request 194.2(d): The amount and any method of calculating economic damages;

Response: Complainants are not seeking economic damages in this proceeding.

Request 194.2(e): The name, address, and telephone number of persons have knowledge of relevant facts, and a brief statement of each identified person's connection with the case;

Jastinder Jawanda
c/o Ali Abazari
Jackson Walker L.L.P.
100 Congress Avenue, Suite 1100
Austin, Texas 78701
T: (512) 236-2000
F: (512) 391-2197
Email: aabazari@jw.com

Mr. Jawanda is the authorized representative of Ker-Seva, Ltd. On behalf of Ker-Seva, Ltd., Mr. Jawanda had conversations with representatives of the City of Frisco, Texas, and Collin County, Texas, regarding water and sewer service to Lot 2.

Discovery is ongoing and Complainants reserve the right to amend and supplement these responses, including the factual bases and legal theories stated herein.

Randall Chrisman
c/o Ali Abazari
Jackson Walker L.L.P.
100 Congress Avenue, Suite 1100
Austin, Texas 78701
T: (512) 236-2000
F: (512) 391-2197
Email: aabazari@jw.com

Mr. Chrisman is the agent of Mr. Jawanda. On behalf of Mr. Jawanda and Ker-Seva, Ltd., Mr. Chrisman had conversations with representatives of the City of Frisco, Texas, and Collin County, Texas, regarding water and sewer service to Lot 2.

Discovery is ongoing and Complainants reserve the right to amend and supplement these responses, including the factual bases and legal theories stated herein.

Terri L. Anderson
Randall Chrisman
c/o Ali Abazari
Jackson Walker L.L.P.
100 Congress Avenue, Suite 1100
Austin, Texas 78701
T: (512) 236-2000
F: (512) 391-2197
Email: aabazari@jw.com

Ms. Anderson is the authorized representative of ADC West Ridge, L.P. and Center for Housing Resources, Inc. Ms. Anderson has experience developing properties for affordable

housing and, on behalf of Complainants, communicated with the City of Frisco, Texas, the City of McKinney, Texas, Collin County, Texas, and other governmental entities to plan and develop Lot 2, including the acquisition of water and sewer service for Lot 2.

Discovery is ongoing and Complainants reserve the right to amend and supplement these responses, including the factual bases and legal theories stated herein.

Cross Engineers
Bill Robinson
Jonathan Hayke
John David Cross

Cross Engineers represented Complainants in filing the Preliminary Plat application with the City of Frisco, and employees of Cross Engineers have knowledge of the development of Lot 2, including the preparation of the Preliminary Plat and location of the water and sewer utilities required by Frisco, and had communications with the City of Frisco officials.

Discovery is ongoing and Complainants reserve the right to amend and supplement these responses, including the factual bases and legal theories stated herein.

Sanchez & Associates
Levi Wild
Tyler Scott
Randall Chrisman
c/o Ali Abazari
Jackson Walker L.L.P.
100 Congress Avenue, Suite 1100
Austin, Texas 78701
T: (512) 236-2000
F: (512) 391-2197
Email: aabazari@jw.com

Engineers with Sanchez & Associates currently represent Complainants in the development of Lot 2, and employees of Sanchez & Associates have knowledge of the development of Lot 2, including the provision of water and sewer service to Lot 2.

Discovery is ongoing and Complainants reserve the right to amend and supplement these responses, including the factual bases and legal theories stated herein.

KWA Construction
Randall Chrisman
Keller Webster
Stan Fulks
c/o Ali Abazari
Jackson Walker L.L.P.
100 Congress Avenue, Suite 1100
Austin, Texas 78701
T: (512) 236-2000
F: (512) 391-2197
Email: aabazari@jw.com

KWA Construction is the general contractor for Complainants on Lot 2. Employees of KWA Construction have had communications with the City of Frisco officials regarding water and sewer service, including water service for construction, at Lot 2.

Discovery is ongoing and Complainants reserve the right to amend and supplement these responses, including the factual bases and legal theories stated herein.

Weir Brothers Contracting, LLC
Randall Chrisman
c/o Ali Abazari
Jackson Walker L.L.P.
100 Congress Avenue, Suite 1100
Austin, Texas 78701
T: (512) 236-2000
F: (512) 391-2197
Email: aabazari@jw.com

Weir Brothers Contract, LLC is a subcontractor for KWA Construction working on the development on Lot 2. Employees of Weir Brothers Contracting, LLC have had communications with the City of Frisco officials regarding the provision of water for construction at Lot 2.

Discovery is ongoing and Complainants reserve the right to amend and supplement these responses, including the factual bases and legal theories stated herein.

Frank Pollacia
c/o Ali Abazari
Jackson Walker L.L.P.
100 Congress Avenue, Suite 1100
Austin, Texas 78701
T: (512) 236-2000
F: (512) 391-2197
Email: aabazari@jw.com

Mr. Pollacia is an architect with Architettura, Inc.. Mr. Pollacia represents Complainants and may have had communications with the City of Frisco regarding the development of Lot 2.

Discovery is ongoing and Complainants reserve the right to amend and supplement these responses, including the factual bases and legal theories stated herein.

City of Frisco
Amy Matthews
Nell Lange
John Lettellier
Toyin Fawehinmi
Russell & Rodriguez, L.L.P.
1633 Williams Dr., Bldg. 2, Suite 200
Georgetown, Texas 78268
T: (512) 930-1317
F: (866) 929-1641
Email: arodriguez@txadminlaw.com

City of Frisco employees may have knowledge of the development of Lot 2 and the provision of water and sewer service to Lot 2.

Discovery is ongoing and Complainants reserve the right to amend and supplement these responses, including the factual bases and legal theories stated herein.

Collin County
Tracy Homfield
Jim Adams
Misty Brown
Susan Fletcher

Employees of Collin County, Texas, may have knowledge of facts relevant to this proceeding, including the development, construction, and provision of water and sewer service to Lot 2 and other properties in the area.

Discovery is ongoing and Complainants reserve the right to amend and supplement these responses, including the factual bases and legal theories stated herein.

Complainants incorporate any other person identified by any other party as a person with knowledge of relevant facts in this proceeding.

Request 194.2(f): For any testifying expert: (1) the expert's name, address, and telephone number; (2) the subject matter on which the expert will testify; (3) the general substance of the expert's mental impressions and opinions and a brief summary of the basis for them, or if the expert is not retained by, employed by, or otherwise subject to the control of the responding party, documents reflecting such information; (4) if the expert is retained by, employed by, or otherwise subject to the control of the responding party: (A) all documents, tangible things, reports, models, or data compilations that have been provided to, reviewed by, or prepared by or for the expert in anticipation of the expert's testimony; and (B) the expert's current resume and bibliography.

Response: Complainants will supplement their responses and respond to this Request in accordance with Order No. 3.

Request 194.2(g): Any indemnity and insuring agreements described in Rule 192.3(f).

Response: None.

Request 194.2(h): Any settlement agreements described in Rule 192.3(g).

Response: None.

Request 194.2(i): Any witness statements described in Rule 192.3(h).

Response: None.

Russell & Rodriguez, LLP
Attorneys At Law
 1633 Williams Drive, Bldg. 2, Suite 200
 Georgetown, TX 78628
 PH. (512) 930-1317

VANTAGE BANK TEXAS
PO Box 790570
San Antonio, Texas 78279
(866) 580-7262
88-1258/1149

12/5/16

PAY TO THE ORDER OF Joe Thomason

\$ **32.80

Thirty-Two and 80/100

DOLLARS

Joe Thomason
c/o Weir Brothers Contracting, LLC
10721 Luna Road
Dallas, TX 75220

MEMO

Witness Fee, Mileage, Meal from City of Frisco

003 268

THIS DOCUMENT CONTAINS A COLORED BACKGROUND. WHITE PAPER. MICROPRINT IS LOCATED BELOW THIS WARNING BAND.

Russell & Rodriguez, LLP/Attorneys At Law

Joe Thomason

12/5/16

Witness Fee, Mileage, Meal from City of Frisco

003268
32.80

1 Vantage Checking Witness Fee, Mileage, Meal from City of Frisco

32.80

Russell & Rodriguez, LLP/Attorneys At Law

Joe Thomason

12/5/16

Witness Fee, Mileage, Meal from City of Frisco

003268
32.80

1 Vantage Checking Witness Fee, Mileage, Meal from City of Frisco

32.80



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