



Control Number: 45870



Item Number: 98

Addendum StartPage: 0

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

2016 DEC -7 PM 12:45

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

**AMENDED REQUEST FOR SUBPOENA FOR DEPOSITION ON WRITTEN
QUESTIONS TO WEIR BROTHERS CONTRACTING, LLC**

TO THE HONORABLE ADMINISTRATIVE LAW JUDGES:

The City of Frisco ("Frisco") files this Amended Request for Subpoena for Deposition on Written Questions pursuant to Public Utility Commission ("PUC") Procedural Rule 22.145. On November 21, 2016, Frisco requested four subpoenas. One request was to subpoena Weir Bros. Partners, LLC. Frisco now understands that the entity was listed in error. Frisco intended to subpoena Weir Brothers Contracting, LLC.¹

All deponents have either designed, developed, or constructed all or parts of the proposed development on the property Complainants² allege have been denied water service. Weir Brothers Contracting, LLC is listed by Complainants as an entity having knowledge of relevant facts.³ All other information contained in the initial Request for Subpoena is incorporated herein. Frisco hereby amends the information as appropriate below:

Party Requesting:

City of Frisco

Date of Request:

December 7, 2016

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

² Complainants are ADC West Ridge, LP and Center for Housing Resources, Inc.

³ A copy of Complainants' Order No. 3 Response to Rule 194.2 is hereby attached as Exhibit B.

Telephone Number:

(512) 930-1317 (Counsel for Frisco)
(512) 236-2000 (Jackson Walker listed as
contact for Weir Brothers
Contracting, LLC)

SOAH Docket No. and Style of Case:

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

Witness to be Subpoenaed: Custodian of Records for Weir Brothers Contracting, LLC

Address and/or Probable location:

13800 Montfort Dr., Suite 160
Dallas, TX 75240

1. **Have the witnesses been asked to appear at the deposition?** Depositions on written questions are being requested. The purpose of the deposition by written questions is to simply verify the authenticity of any documents produced.
2. **Explain the relevance of the witness' testimony and/or documents.** The City needs the documents to determine the scope of the development on the property from a capacity standpoint. Additionally, there have been assertions that one or all have attempted to connect to water and/or sewer connections when Complainants have not established themselves as qualified applicants.
3. **Is the information requested of the witness available from another source.** No. The City requested the information from Complainants. Complainants have objected and resisted production of the documents.
4. **Estimate the number of days that this witness will be needed:** Less than one hour.
5. **Estimate the total travel mileage from the witness' residence to the deposition location:**

27 miles
6. **Witness fee.** The City tenders \$30.40 witness fee for the witness, which includes a \$10 witness fee, \$5.40 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:** December 23, 2016, at 10:00 a.m.
8. **List the documents you would like the witness to produce:**

See Exhibit A to each subpoena draft submitted.

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 7th 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 KER-SEVA LTD., ADC WEST RIDGE L.P., AND CENTER FOR HOUSING RESOURCES, INC. AGAINST THE CITY OF FRISCO	§ § § §	BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS
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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:

Records Manager
Weir Brothers Contracting, LLC
P.O. Box 541793
Dallas, Texas 75354

By and through its registered agent:
Mitchell Madden
13800 Montfort Dr., Suite 160
Dallas, TX 75240

to appear before Abernathy, Roeder, Boyd & Hullett, P.C., at 1700 Redbud Blvd., Suite 300, McKinney, Texas 75069 at 10:00 a.m. on December 23, 2016, in order to give deposition on written questions 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:

Items listed in the attached Exhibit A.

EXHIBIT A

FAILURE BY ANY PERSON WITHOUT ADEQUATE EXCUSE TO OBEY A SUBPOENA SERVED UPON THAT PERSON MAY RESULT IN THE INITIATION OF ENFORCEMENT PROCEEDINGS AND MAY BE PUNISHED IN ACCORDANCE WITH CIVIL AND/OR CRIMINAL SANCTIONS IN PROCEEDINGS BROUGHT IN DISTRICT COURT.

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 Respondent, 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 7th 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
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Administrative Law Judge
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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.

EXHIBIT A

SUBPOENA FOR PRODUCTION OF DOCUMENTS

The following instructions and definitions apply to the Subpoena and your responses thereto.

INSTRUCTIONS

1. These requests are continuing in nature and require supplementary responses if you or your attorney obtain information which reveals that your responses were incorrect or incomplete when made or that your responses are no longer correct or complete.

2. If any document requested herein has been destroyed, you are requested to describe in detail the circumstances of and reasons for such destruction and to produce all documents which relate to either the circumstances or the reasons for such destruction.

3. If any document requested herein is withheld under claim of privilege or is not produced for whatever reason, you are instructed to comply with Rule 193.3 of the Texas Rules of Civil Procedure and (i) to state with specificity the claim of privilege or other reason used to withhold production, and (ii) to identify each such document by date, author, addressee, persons or entities copied, persons or entities who reviewed the document, and subject matter, without disclosing its contents, in a manner sufficient to allow it to be described to the Administrative Law Judge for ruling on the privilege or other reason asserted. You are further requested to produce those portions of any such documents which are not subject to a claim of privilege or other reason for non-production by excising or otherwise protecting the portions for which privilege is asserted, if such a technique does not result in disclosing the contents of the portions for which some privilege is asserted. Also, for each document you claim is not discoverable, state the date of the document; the name, job title, and address of the person who prepared it; the name, job title, and address of the person to whom it was addressed or circulated, or who saw it; the name, job title, and address of the person now in possession of the document; a description of the subject matter of the document; and the present location and the custodian for the document.

4. Unless otherwise specified, the documents requested cover the period since January 1, 2008 until present.

DEFINITIONS

1. The term "Person" as used herein includes individuals, general partnerships, limited partnerships, corporations, governmental units, and any other form of business entity or association, as the case may be.
2. "Documents" is defined broadly to include all originals and all non-identical copies of all written, typed, printed, recorded, or graphic matter, as well as all attachments, addenda, and appendices thereto, of any nature or description whatsoever, wherever located, and in whatever form or condition, in both hard copy and electronic format.

As the context requires, "documents" includes tangible things of every kind and description, which may be non-documentary in nature.

Pursuant to Rule 196.4 of the Texas Rules of Civil Procedure, request is made for the production of all data or information that exists in electronic or magnetic form. Request is also made for this data to be produced in hard-copy (paper) form.

3. "Communications" means any exchange of information, whether written or oral, including, but not limited to, exchanges of information in conversation (both face to face and telephonic) and correspondence.
4. The term "Concerning" shall mean referring to, evidencing, reflecting, constituting or supporting.
5. "You" or "Wier" shall refer to Weir Bros. Partners, LLC, and as the context requires, includes its present and former predecessors, successors, affiliates, parents, subsidiaries, agents, assigns, officers, directors, employees, attorneys, representatives, and/or any person or entity acting or purporting to act in concert with it, on its behalf, or under its control, directly or indirectly.
6. "City" or "Frisco" refers to the City of Frisco, Texas.
7. "Ker-Seva" refers to Ker Seva, Ltd., and as the context requires, includes its present and former predecessors, successors, affiliates, parents, subsidiaries, agents, assigns, officers, directors, employees, attorneys, representatives, and/or any person or entity acting or purporting to act in concert with it, on its behalf, or under its control, directly or indirectly.
8. "ADC West Ridge" refers to ADC West Ridge, LP, and as the context requires, includes its present and former predecessors, successors, affiliates, parents, subsidiaries, agents, assigns, officers, directors, employees, attorneys, representatives, and/or any person or entity acting or purporting to act in concert with it, on its behalf, or under its control, directly or indirectly.
9. "Center for Housing Resources" refers to Center for Housing Resources, Inc., and as the context requires, includes its present and former predecessors, successors, affiliates, parents, subsidiaries, agents, assigns, officers, directors, employees, attorneys, representatives, and/or any person or entity acting or purporting to act in concert with it, on its behalf, or under its control, directly or indirectly.
10. "Complainants" refers to Ker Seva Ltd., ADC West Ridge, LP, and Center for Housing Resources, Inc. collectively or independently.
11. "Lot 2" refers to the property with the address of 9331 Westridge Boulevard, Collin County, Texas.

REQUESTED DOCUMENTS OR TANGIBLE ITEMS

1. All documents, including but not limited to, any and all reports, notes, contracts, agreements, memorandum, communications, electronic mail, texts, or other correspondence pertaining to Ker-Seva Ltd., ADC West Ridge, LP and/or Center for Housing Resources, Inc., collectively or individually.
2. All documents, including but not limited to, any and all reports, notes, contracts, agreements, memorandum, communications, electronic mail, texts, or other correspondence pertaining to Lot 2.

3. All documents reflecting communications between you and Ker-Seva Ltd., concerning Lot 2 or any adjacent property.
4. All documents reflecting communications between you and ADC West Ridge, LP, concerning Lot 2 or any adjacent property.
5. All documents reflecting communications between you and Center for Housing Resources, Inc., concerning Lot 2 or any adjacent property.
6. 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 Lot 2 or any adjacent property.

**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.chang@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
(512) 322-2061- Fax

Via Facsimile (512) 322-2061

Meitra Farhadi
Administrative Law Judge
State Office of Administrative Hearings
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Austin, Texas 78701
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(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.

003266

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
 (888) 580-7262
 88-1258 1149

12/2/16

PAY TO THE ORDER OF Stan Fulks

\$ **10.00

Ten and 00/100*****

DOLLARS

Stan Fulks
 16800 Westgrove Drive
 Suite 400
 Addison, TX 75001

MEMO

City of Frisco's Tendering of \$10.00 Witness Fee

⑈003266⑈

Russell & Rodriguez, LLP/Attorneys At Law

Stan Fulks

12/2/16

City of Frisco's Tendering of \$10.00 Witness Fee

003266
 10.00

1 Vantage Checking City of Frisco's Tendering of \$10.00 Witness Fee

10 00

Russell & Rodriguez, LLP/Attorneys At Law

Stan Fulks

12/2/16

City of Frisco's Tendering of \$10 00 Witness Fee

003266
 10 00

1 Vantage Checking City of Frisco's Tendering of \$10.00 Witness Fee

10.00



10193

003265

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 790670
San Antonio, Texas 78279
(866) 580-7262
88-1268-1149

12/2/16

PAY TO THE ORDER OF **John David Cross**

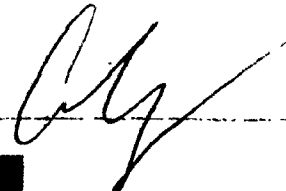
\$ **10.00

Ten and 00/100***** DOLLARS

John David Cross
131 S. Tennessee
McKinney, TX 75069

MEMO

City of Frisco's Tendering of \$10.00 Witness Fee



⑈003265⑈

Russell & Rodriguez, LLP/Attorneys At Law

John David Cross

12/2/16

City of Frisco's Tendering of \$10.00 Witness Fee

003265
10.00

1 Vantage Checking City of Frisco's Tendering of \$10.00 Witness Fee 10.00

Russell & Rodriguez, LLP/Attorneys At Law

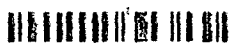
John David Cross

12/2/16

City of Frisco's Tendering of \$10.00 Witness Fee

003265
10.00

1 Vantage Checking City of Frisco's Tendering of \$10.00 Witness Fee 10.00



003276

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

12/7/16

PAY TO THE
ORDER OF

Weir Brothers Contracting, LLC

\$ **30.40

Thirty and 40/100*****

DOLLARS

Weir Brothers Contracting, LLC
 13800 Montford Dr., Suite 160
 Dallas, TX 75240

MEMO

Witness Fee, Mileage, Meal Expense



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