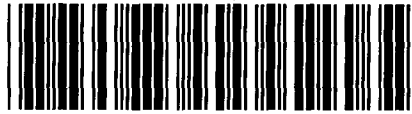


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Addendum StartPage: 0

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PUC DOCKET NO. 46150

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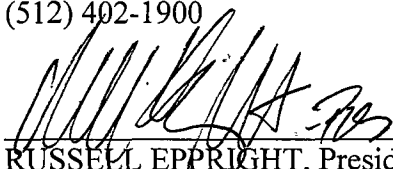
APPLICATION OF PK-RE § BEFORE THE STATE OFFICE  
DEVELOPMENT COMPANY, INC. § FILING CLERK  
d/b/a OAK SHORES WATER SYSTEM §  
AND UNDINE DEVELOPMENT LLC § OF  
FOR SALE, TRANSFER, OR MERGER §  
OF FACILITIES AND CERTIFICATE §  
RIGHTS IN TRAVIS COUNTY § ADMINISTRATIVE HEARINGS

**PK-RE DEVELOPMENT COMPANY'S  
RESPONSE TO GREENSHORES ON LAKE AUSTIN  
PROPERTY OWNERS' ASSOCIATION, INC.'S  
FIRST REQUEST FOR INFORMATION**

PK-RE Development Company d/b/a Oak Shores Water System ("PK-RE") files this Response to the First Request for Information ("RFI") filed by Greenshores on Lake Austin Property Owners' Association, Inc. ("Greenshores"). The discovery request was received by PK-RE on December 16, 2016. Pursuant to an agreement with counsel for Greenshores, responses are due on January 13, 2017. Thus, these responses are timely filed. Pursuant to 16 Tex. Admin. Code § 22.144(c)(2)(F), these responses may be treated as if they were filed under oath.

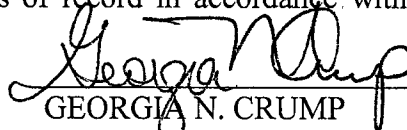
Respectfully submitted,

PK-RE Development Company, Inc. dba  
Oak Shores Water System  
500 N. Capital Hwy., Bldg. 1, Suite 125  
Austin, Texas 78746  
(512) 402-1900

  
\_\_\_\_\_  
RUSSELL EPPRIGHT, President  
Hill County Galleria, Bldg. B  
13301 Galleria Circle, Suite B175  
Bee Cave, Texas 78738  
(512) 347-1530

### **CERTIFICATE OF SERVICE**

I hereby certify that on January 13, 2017, true and correct copy of the foregoing document has been served on all parties of record in accordance with 16 Tex. Admin. Code § 22.74.

  
\_\_\_\_\_  
GEORGIA N. CRUMP

**GREENSHORES ON LAKE AUSTIN POA  
FIRST REQUEST FOR INFORMATION TO PK-RE  
GREENSHORES RFI NO. 1-1 THROUGH 1-4**

Greenshores RFI No. 1-1      Please identify all affiliates of PK-RE.

**Response**

PK-RE Ltd.

Woods of Greenshores Ltd.

Prepared by: Russell Eppright

Sponsored by: Russell Eppright

**GREENSHORES ON LAKE AUSTIN POA  
FIRST REQUEST FOR INFORMATION TO PK-RE  
GREENSHORES RFI NO. 1-1 THROUGH 1-4**

Greenshores RFI No. 1-2      Please provide the name, address and telephone number for any person who owns any portion of PK-RE or any of its affiliates.

**Response**

Russell Eppright  
1504 Bruton Springs Rd.  
Austin, TX 78733  
512-470-0705

Ben Bentzin  
2305 Windsor Rd.  
Austin, TX 78703  
512-828-7070

Prepared by: Russell Eppright  
Sponsored by: Russell Eppright

**GREENSHORES ON LAKE AUSTIN POA  
FIRST REQUEST FOR INFORMATION TO PK-RE  
GREENSHORES RFI NO. 1-1 THROUGH 1-4**

Greenshores RFI No. 1-3      Please provide the name, address, and telephone number of persons having knowledge of relevant facts, and a brief statement of each identified person's connection with the case.

**Response**

Russell Eppright  
1504 Bruton Springs Rd.  
Austin, TX 78733  
512-470-0705

President of PK-RE Development Company, Inc. – Has overall knowledge of system.

Prepared by: Russell Eppright  
Sponsored by: Russell Eppright

**GREENSHORES ON LAKE AUSTIN POA  
FIRST REQUEST FOR INFORMATION TO PK-RE  
GREENSHORES RFI NO. 1-1 THROUGH 1-4**

Greenshores RFI No. 1-4      For any testifying expert, please provide:

- (i) the expert's name, address and telephone number;
- (ii) the subject matter on which the expert will testify;
- (iii) 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;
- (iv) if the expert is retained by, employed by, or otherwise subject to the control of the responding party.

**Response**

PK-RE has not at this time identified any testifying experts.

Prepared by: Russell Eppright  
Sponsored by: Russell Eppright