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COMPLAINT OF WES ANDERSON,  
ET. AL. AGAINST QUADVEST L.P.,  
QUADVEST, INC., RANCH UTILITIES  
CORP., AND RANCH UTILITIES, L.P.

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PUBLIC UTILITY COMMISSION

OF TEXAS

**QUADVEST L.P., QUADVEST, INC., RANCH UTILITIES CORP.,  
AND RANCH UTILITIES, L.P.'S FIRST REQUEST FOR INFORMATION  
TO PLAINTIFFS QUESTION NOS. QUADVEST 1-1 THROUGH QUADVEST 1-22**

TO: Plaintiffs, Wes Anderson, et al., by and through their attorney of record, Daniel R. Dutko,  
H. Mark Burck, Hanszen LaPorte, LLP, 11767 Katy Freeway, Suite 850, Houston, Texas  
77079..

Defendants, Quadvest, L.P., Quadvest, Inc., Ranch Utilities Corp., and Ranch Utilities,  
L.P. (hereinafter "Quadvest"), serves the following First Request for Information to Plaintiffs.

Respectfully submitted,

**COZEN O'CONNOR**

By: Tammy Wavle Shea  
Tammy Wavle Shea w/p  
State Bar No. 24008908 N. Wavle  
1221 McKinney, Suite 2900  
Houston, Texas 77010  
Phone: (713) 750-3148  
Fax: (832) 214-3905  
Email: [tshea@cozen.com](mailto:tshea@cozen.com)

**ATTORNEYS FOR QUADVEST, L.P.,  
QUADVEST, INC., RANCH UTILITIES  
CORP., AND RANCH UTILITIES, L.P.**

### CERTIFICATE OF SERVICE

On this the 3rd day of August, 2017, a true copy of the foregoing document was served upon all parties of record by electronic mail, facsimile, email and/or U.S. mail, postage paid.

Tammy Wavle Shea

Tammy Wavle Shea w/p

*NW*

**SOAH DOCKET NO. 473-17-3320.WS**  
**DOCKET NO. 46439**

**QUADVEST'S FIRST REQUEST FOR INFORMATION TO PLAINTIFFS**

- 1-1 Admit or deny that the size of the lot at 19818 Black Cherry Bend Ct. is 7050 square feet according to Harris County Appraisal District Records.
- 1-2 Admit or deny that you do not dispute that the size of the lot at 19818 Black Cherry Bend Ct. is 7050 square feet.
- 1-3 If you deny the previous request, state the basis for your denial and indicate the size of the lot at 19818 Black Cherry Bend Ct, in square feet, that you believe is accurate.
- 1-4 Was there a sprinkler system at 19818 Black Cherry Bend Ct. during the time that you resided there? If so, identify the sprinkler system, the number of zones, the number of sprinkler heads, the normal duration of irrigation for each zone and the frequency of irrigation (days per month and number of times per day).
- 1-5 What time of day do you normally use your irrigation system at 32811 Sawgrass Ct to water your lawn? From when to when?
- 1-6 Does your irrigation system at 32811 Sawgrass Ct have a rain sensing device?
- 1-7 How many square feet is your home located at 32811 Sawgrass Ct.?
- 1-8 How many bathrooms are there in your home located at 32811 Sawgrass Ct.?
- 1-9 How many people live in the home at 32811 Sawgrass Ct.?
- 1-10 Are there school age children living in the home at 32811 Sawgrass Ct.?
- 1-11 Do you have horses or livestock at 32811 Sawgrass Ct.?
- 1-12 Do you have low flow (water saving) fixtures installed in your home located at 32811 Sawgrass Ct.?
- 1-13 Identify the size of the lot located at 19818 Black Cherry Bend Ct.
- 1-14 Identify the number of water meters located at 19818 Black Cherry Bend Ct.
- 1-15 Do you contend that water usage is inaccurate for any time period after August, 2016? If so, state the reasons for your contention and the amount you contend is accurate for each month from September 2016 to the present.
- 1-16 State the water usage that you contend would be accurate for the period July and August 2016.

- 1-17 Admit that you are not an expert in water meter accuracy.
- 1-18 Admit that you are not an expert in water pipe corrosion.
- 1-19 Admit that you are not an expert in replacing and installing meters.
- 1-20 How many zones does your irrigation system located at 32811 Sawgrass Ct have?
- 1-21 How long does each zone run at your irrigation system located at 32811 Sawgrass Ct?
- 1-22 Approximately, how many sprinkler heads are in each zone in your irrigation system located at 32811 Sawgrass Ct?