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PUBLIC UTILITY COMMISSION
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COMPLAINT OF WES ANDERSON, § PUBLIC UTILITY COMMISSION
ET. AL. AGAINST QUADVEST L.P., §
QUADVEST, INC., RANCH UTILITIES §
CORP., AND RANCH UTILITIES, L.P. § OF TEXAS

SOAH DOCKET NO. 473-17-5772.WS
DOCKET NO. 47279

COMPLAINT OF WES ANDERSON, § PUBLIC UTILITY COMMISSION
ET AL. AGAINST QUADVEST LP, §
QUADVEST, INC., RANCH UTILITIES §
CORP. AND RANCH UTILITIES, L.P. § OF TEXAS

**QUADVEST L.P., QUADVEST, INC., RANCH UTILITIES CORP.,
AND RANCH UTILITIES, L.P.'S SECOND REQUEST FOR INFORMATION
TO PLAINTIFF STEPHEN JONES**

TO: Plaintiff, Stephen Jones, et al., by and through his 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 Second Request for Information to Plaintiff Stephen Jones.

Respectfully submitted,

COZEN O'CONNOR

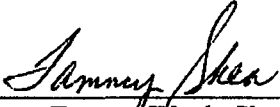
By: Tammy W. Shea *by permission def*
Tammy W. Shea
State Bar No. 24008908
1221 McKinney, Suite 2900
Houston, Texas 77010
Phone: (713) 750-3148
Fax: (832) 214-3905
Email: tshea@cozen.com

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

70,

CERTIFICATE OF SERVICE

On this the 16th day of November, 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 *by permission*

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QUADVEST'S SECOND REQUESTS FOR INFORMATION TO STEPHEN JONES

- 2-1 Identify the correct names of the parties to the lawsuit.
- 2-2 Identify the name, address and telephone number of any potential parties.
- 2-3 Identify 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).
- 2-4 Identify the name, address and telephone number of persons having knowledge of relevant facts and a brief statement of each identified person's connection with this case.
- 2-5 Identify 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;

If the expert is retained by, employed by, or otherwise subject to the control of the responding party, please produce:

- (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.
- 2-6 Produce any discoverable indemnity and insuring agreements described in TRCP 192.3(f).
- 2-7 Produce any discoverable indemnity and insuring agreements described in TRCP 192.3(f).
- 2-8 Produce any discoverable settlement agreements described in TRCP 192.3(g).
- 2-9 Produce any discoverable witness statements described in TRCP 192.3(h).

- 2-10 Produce all correspondence with any third party regarding your complaint, water usage, or meters.
- 2-11 Produce all correspondence with parties to this complaint regarding your complaint, water usage, or meters.
- 2-12 Produce all emails, notices, or other communications with residences in your area regarding your complaint, water usage, or meters.