



Control Number: 46923



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DOCKET NO. 46923

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SOAB DOCKET NO. 473 17 5770.WS

APPLICATION OF WOLFE & PUBLIC UTILITY COMMISSION OF
AIRPARK CIVIC CLUB, INC. TO & TEXAS

OBTAIN A WATER CERTIFICATE

OF CONVENIENCE AND

NECESSITY IN BRAZORIA COUNTY

RESPONDENT'S MOTION FOR LEAVE TO FILE RESPONSE TO
APPLICANT'S RESPONSE TO WALKER'S REPLY BRIEF

TO THE HONORABLE JUDGE OF SAID COURT

NOW COMES Respondent, Joe Walker PE and submits this Motion for Leave to File Response to Applicant's Response to Walker's Reply Brief, and would respectfully show the Court the following:

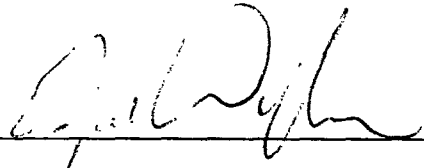
1. The Applicant has "doubled down" on the submittal of false and misleading information to the Court by using this opportunity outside the scheduled exchange of information and briefs outlined by the Court to provide more inaccurate information designed to mislead the Court.
2. The previous documents and testimony submitted by Applicant have been shown to be inaccurate, misleading, and false to a very large extent. At this point the Applicant is trying to include additional false information to dissuade the Court from focusing on the actual Rules and Regulations of the Texas Administrative Code which have been ignored by Applicant.
3. Applicant has provided the Court with false information to disguise misconduct. Respondent can provide positive evidence that all allegations by Respondent are true and the defenses included in Applicant's document are not only false, but false to an even greater extent as the previously submitted documents.
4. Applicant's document is a desperate attempt to paint the Respondent as an unreliable source by falsifying the conditions that have existed with the subdivision water system for many years. The statements to this effect by Applicant represent even more misconduct.

ACCORDINGLY, APPLICANT REQUESTS that the Court grant leave to the Respondent to submit its Response to Applicant's Response to Walker's Reply Brief.

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Respectfully submitted,

Joe Walker PE

By 

Joe Walker PE

Texas License No. 80873

819 Hal McClain

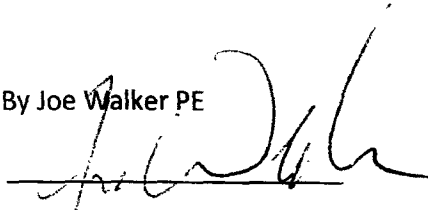
Manvel, Texas 77578

joewalkerpe@gmail.com

CERTIFICATE OF SERVICE

I certify that a true copy of this document, together with any attachments, has been served on August 27, 2018 on the Legal Division of the Texas PUC by serving Rachelle Robles, John Hampton, and Melissa Ethridge by email and Texas Central Records by USPS.

By Joe Walker PE


Joe Walker PE

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APPLICATION OF WOLFE & PUBLIC UTILITY COMMISSION OF
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OBTAIN A WATER CERTIFICATE

OF CONVENIENCE AND

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ORDER GRANTING LEAVE TO FILE RESPONDENT'S RESPONSE

ON THIS DAY CAME ON TO BE HEARD the Respondent's Motion for Leave to File a Response to
Applicant's Response to Walker's Reply Brief _____

And the Court, having considered the Augments and authorities presented herein, hereby GRANTS
Respondent's Motion for Leave to file a Response to Applicant's Response to Walker's Reply Brief.

SIGNED THIS _____ DAY OF _____, 2018

JUDGE PRESIDING