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PETITION OF 121 PRIMEWOOD	§ PUBLIC UTILITY COMMISSION
INVESTMENTS, LP TO AMEND	§ PUBLIC UTILITY COMMISSION FILING CLERK
H-M-W SPECIAL UTILITY DISTRICT'S	§
CERTIFICATE OF CONVENIENCE	§ OF TEXAS
AND NECESSITY IN MONTGOMERY	Š
COUNTY BY EXPEDITED RELEASE	§

MOTION TO INTERVENE

Comes now the HMW SPECIAL UTILITY DISTRICT OF HARRIS AND MONTGOMERY COUNTIES ("HMW"), filing its Motion to Intervene, and states as follows:

- 1. HMW is a Texas water district and the holder of Certificate of Convenience and Necessity No. 10342 (the "CCN").
- 2. Petitioner seeks to decertify portions of the CCN.
- 3. HMW has served portions of the area within its CCN that are adjacent to the area sought to be decertified.
- 4. HMW is capable of serving the area sought by Petitioner to be decertified by the expansion and extension of existing facilities nearby that are within its CCN.
- 5. HMW concurs that Petitioner has never requested service by HMW to the area it seeks to decertify.
- 6. Accordingly, HMW is an interested party with (a) a statutory right to participate, and (b) assets at stake in this proceeding that are a justiciable interest. Accordingly HMW should be permitted to intervene.

Wherefore premises considered, HMW requests that it be permitted to intervene, and to obtain such other and further relief to which it is entitled.

Respectfully submitted,

Patrick F. Timmons, Jr. State Bar No. 20049500 8556 Katy Freeway, Suite 120 Houston, Texas 77024 (713) 465-7638 Office

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Motion to Intervene, has been forwarded to Primewood Investments, L.P., through Dominic Leung, President, Richfield Real Estate Corporation, General Partner, at 10001 Westheimer Rd # 2888, Houston, TX 77042 and David J. Klein, Lloyd Gosselink Rochelle & Townsend, P.C., 816 Congress Ave # 1900, Austin, TX 78701, Facsimile No. (512) 472-0532, and Email to dklein@lglawfirm.com, on this 31st day of January, 2018.

Respectfully submitted,

Patrick F. Timmons, Jr.