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DOCKET NO. 49280

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Petition of Previllage, LLC to Amend HMW	*	Before the Public Utility Commission
Special Utility District's Water Certificate of	*	of Texas
Convenience and Necessity in Harris County	*	
by Expedited Release	*	

Motion to Extend Filing Date for Response to Administratively Complete Petition

Comes now the HMW Special Utility District of Harris and Montgomery Counties ("HMW"), filing its Motion to Extend Filing Date for its Response to the Administratively Complete Petition (the "Motion"), and states as follows:

I.

HMW will seek discovery from the Petitioner and Quadvest, L.P., regarding its contentions under Texas Water Code Section 13.252. See HMW's Response to Petition and prior pleadings regarding its Motion to Dismiss. Such discovery requests will be served on or before Tuesday, September 17, 2019.

II.

While Order No. 5 provides sufficient time for disposition of this case on the assumption that no discovery is required, discovery is appropriate and should be beneficial in regard to the issue raised under Section 13.252. This suggests that Order No. 5 should be modified to accommodate that question.

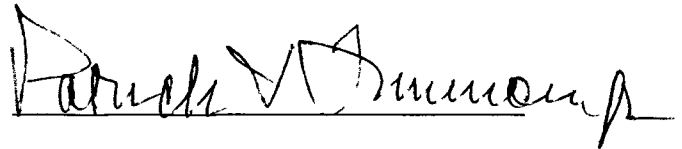
The undersigned counsel is uncertain whether HMW's discovery request speaks to whether the Petition is administratively complete, however, Order No. 5 does address scheduling, including the submission of a final response by HMW on or before September 26, 2019. Therefore, additional time is hereby requested to file this Motion, through and including September 17, 2019. Concurrently with the filing of its discovery requests on that date, HMW will also propose an extended date for the filing of HMW's response to the Staff's recommendation for final disposition.

Finally, the undersigned counsel states that he has been in preparation for an October jury trial and a federal appeal, and also fully engaged in the normal business of his office, continuously since the issuance of Order No.5. Consequently, he has had insufficient time to raise the issues set forth in this Motion until the expected date of its filing on Friday, September 13, 2019.

Wherefore, premises considered, HMW moves the PUC to grant its Motion to Extend Filing Date for Response to Administratively Complete Petition, through and including September 17, 2019, and for such other and further relief as the Commission deems proper under applicable law.

Respectfully submitted,

Law Offices of Patrick F. Timmons, Jr., P.C.

A handwritten signature in black ink, appearing to read "Patrick F. Timmons, Jr.", written over a horizontal line.

Patrick F. Timmons, Jr.

1503 Buckmann Ct

Houston, Texas 77043

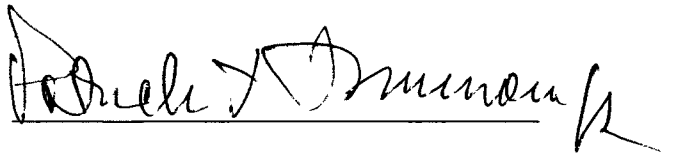
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Certificate of Service

I hereby certify that a true copy of the foregoing Motion was served on the Applicant, PUC staff and all other parties on this 12th day of September, 2019, by U.S. First Class Mail, as provided by 16 TAC Section 22.74.

A handwritten signature in black ink, appearing to read "Patrick F. Timmons, Jr.", written over a horizontal line.

Patrick F. Timmons, Jr.