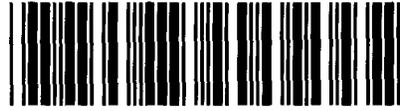


Control Number: 49280



Item Number: 22

Addendum StartPage: 0

DOCKET NO. 49280

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

Before the Public Utility Commission  
of Texas

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PUBLIC UTILITY COMMISSION  
FILING CLERK

**HMW's Motion to Direct Responses to Discovery**

Comes now the HMW Special Utility District of Harris and Montgomery Counties("HMW"), filing its Motion to Direct Responses to Discovery("Motion"), and states as follows:

I.

HMW reasserts its Motion to Dismiss and all other pleadings filed in response to the sworn to decertify property in Montgomery County, Texas, within HMW's Certificate of Convenience No. 10342(the "CCN"). Further, its motion for a deadline extension filed on September 13, 2019, is both timely and appropriate.

II.

Inasmuch as Quadvest, L.P.("Quadvest") has made clear that it objects tom discovery, HMW hereby files its motion to require responses by Quadvest and the Applicant to the discovery filed herewith.

III.

In support of its Motion, HMW asserts the following:

1. The Commission is fully authorized to require and regulate discovery in all proceedings before it;
2. While the Commission may shorten the response time, and should consider doing so, the discovery requested by HMW conforms to the response time provided by the Commission's rules of procedure;
3. The response date is also within the time provided by statute for the Commission to decide this application on its merits;
4. The requested discovery is relevant to the disposition of the application on its merits, presuming that the Commission does not grant HMW's motion to dismiss the application, on which the Commission has not ruled;
5. The requested discovery conforms to the Commission's rules; and
6. The requested discovery to both parties is hardly onerous, consisting of four questions, two requests for documents and three requests for admission.

See Commission Procedural Rules, Subchapter H, Sections 22.141 through 22.144.

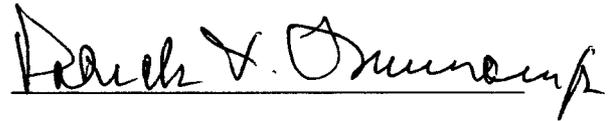
IV.

Accordingly, Quadvest's objections have no merit and should be denied. Further, the Commission should promptly order the compliance with the requested discovery by Quadvest and the Applicant.

Wherefore, premises considered, HMW moves the PUC to grant its Motion to Direct Responses to Discovery, and grant other and further relief as the Commission deems proper under applicable law.

Respectfully submitted,

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



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1503 Buckmann Ct

Houston, Texas 77043

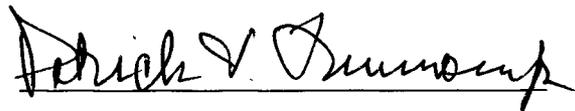
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Certificate of Service

I hereby certify that a true copy of the foregoing Motion to Intervene was served on the Applicant and the PUC staff on this 16th day of September, 2019, as provided by 16 TAC Section 22.74.



Patrick F. Timmons, Jr.