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PUC DOCKET NO. 49795
SOAH DOCKET NO. 473-20-1118



COMPLAINT OF PETTY GROUP, LLP §
AGAINST RIO GRANDE ELECTRIC §
COOPERATIVE, INC. §

BEFORE THE
STATE OFFICE OF
ADMINISTRATIVE HEARINGS

**SUPPLEMENT TO PETTY GROUP, LLP'S RESPONSE TO RIO GRANDE ELECTRIC
COOPERATIVE'S MOTION TO COMPEL AND REQUEST FOR IN CAMERA
INSPECTION**

Petty Group, LLP ("Petty") hereby submits this Supplement to Petty's Response to Rio Grande Electric Cooperative's ("RGEC") Motion to Compel and Request for In Camera Inspection, which Petty filed on May 7, 2020. As indicated in Petty's Response, Petty is supplementing its prior filing with the signed affidavit of Petty witness Nathan Morgan (Attachment D).

Respectfully submitted,

/s/ Meghan E. Griffiths

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ATTORNEYS FOR PETTY GROUP, LLP

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the forgoing was served on all parties of record in this proceeding on the 15th day of May, 2020 by hand delivery, facsimile, electronic mail, First Class U.S. Mail, or overnight delivery.

/s/ Alisha Mehta _____
Alisha Mehta

ATTACHMENT D

STATE OF TEXAS §
 §
COUNTY OF UVALDE §

AFFIDAVIT OF NATHAN MORGAN

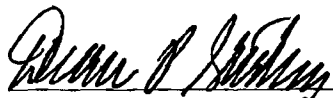
The undersigned, Nathan Morgan, being first duly sworn on oath, states as follows:

1. My name is Nathan Morgan. I am over the age of twenty-one years, am of sound mind, and have personal knowledge of the statements made herein and that the facts are true and correct. I am competent to make this affidavit.
2. I founded MC Electric, an electrical contracting business, with my business partner. We are the primary electric contractor for MC Builders, a general contracting firm.
3. I am making this affidavit in support of Petty Group, LLP's ("Petty") assertion that the three documents listed and attached as Appendix A under the heading "Nathan Morgan," including Privilege Log Items 60, 62, and 68 (collectively, the "Documents") are exempt or privileged from discovery because they constitute work product.
4. I have not distributed the communications in the Documents to any persons other than representatives of Petty and its limited consultants.
5. The communications contained in Documents were made under conditions to protect their confidentiality and I have maintained the confidentiality thereof.
6. None of the Documents were either prepared or received by me in anticipation of my testimony in this proceeding.
7. None of the Documents formed the basis for my testimony nor did I rely on the Documents in preparing such testimony.



Witness

SWORN AND SUBSCRIBED TO before me, Notary Public, on this 8th day of May, 2020, to certify which witness my hand and seal of office.



NOTARY PUBLIC in for the
State of Texas

Printed Name: Dean P Sterling

My Commission expires: 3-21-2024

SEAL

