



Control Number: 49795



Item Number: 157

Addendum StartPage: 0



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

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

**BEFORE THE
STATE OFFICE OF
ADMINISTRATIVE HEARINGS**

NOTICE OF ORAL DEPOSITION OF DANNY WELLS

TO: Rio Grande Electric Cooperative, Inc., by and through its attorney of record, Tammy Wavle-Shea, 400 N. Sam Houston Pkwy E, Suite 413, Houston, Texas 77060

Notice

Please take notice that, Complainant Petty Group, LLP (“Petty”), by and through its attorney and by agreement of counsel for Rio Grande Electric Cooperative, Inc. (“RGEC”), intends to take the oral deposition of Daniel “Danny” W. Wells at 1:30 p.m. on August 10, 2020 to be conducted remotely via teleconference pursuant to the Texas Supreme Court’s Eighteenth Emergency Order Regarding the COVID-19 State of Disaster, pursuant to Tex. R. Civ. P. 199.2 and PUC Procedural Rule 22.143, 16 Tex. Admin. Code § 22.143. The deposition will be taken before a court reporter duly authorized to administer oaths and shall continue from day-to-day until completed. The deposition and any documents produced at or prior to such deposition may be used as evidence at the hearing on the merits. Please be advised that a corporate representative and an expert witness of Complainant with knowledge related to the area will be in attendance.

Request for Information

Please bring to the deposition an electronic copy of all documents or other information Mr. Wells received or reviewed in preparation for the above-noticed deposition and pre-filed written testimony in this proceeding, except for documents previously filed in this docket.

Respectfully submitted,

JACKSON WALKER L.L.P.

By: /s/ Meghan E. Griffiths

Meghan E. Griffiths
State Bar No. 24045983
Jennifer Ferri
State Bar No. 24065224
Jackson Walker LLP
100 Congress Ave., Suite 1100
Austin, Texas 78701
512-236-2363
512-391-2163 (fax)
mgriffiths@jw.com
jferri@jw.com

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 29th day of July, 2020 by hand delivery, facsimile, electronic mail, First Class U.S. Mail, or overnight delivery.

/s/ Jennifer Ferri
Jennifer Ferri