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**DISTRICT COURT CAUSE # D-I-GN-21-003465 of 98th JUDICIAL DISTRICT COURT
OF TRAVIS COUNTY
SOAH DOCKET NO. 473-20-3472
PUC DOCKET NO. 50545**

SUIT OF PALOMA ICE AND	§	BEFORE THE 98TH JUDICIAL
BRISCOE RANCH RELATED TO	§	
APPLICATION OF AEP TEXAS INC.	§	DISTRICT COURT OF TRAVIS
TO AMEND ITS CERTIFICATE OF	§	
CONVENIENCE AND NECESSITY	§	COUNTY
FOR THE BRACKETTVILLE TO	§	
ESCONDIDO 138-KV TRANSMISSION	§	
LINE IN KINNEY AND MAVERICK		
COUNTIES		

DAVID CONOYL RANCH MOTION TO INTERVENE

As a vested stakeholder and prominent intervenor in the original Administrative Hearing on PUC DOCKET 50545, in which this district suit challenges, David Conoly Ranch LLC respectfully files this motion to intervene in order to preserve its rights related to this case. Given the alternative route advocated by the plaintiffs directly impacts the ranch of our family, it is critical we remain intervenors to the case.

Intervenor David Conoly Ranch LLC (“David Conoly Ranch”) files this Motion to Intervene, which is attached. David Conoly Ranch stipulates that this Motion to Intervene can be treated by all parties as if the answers were filed under oath.

Respectfully submitted,

/s/ David Conoly

David Conoly, Attorney at Law

David Conoly Ranch LLC

1930 Glenoak

Corpus Christi, TX 78418

CERTIFICATE OF SERVICE

I certify that a copy of this document will be served on all parties of record to PUC Docket 50545 in which this District Court case relates on August 27th, 2021 in accordance with Public Utility Commission Procedural Rule 22.74.

_____/s/ David Conoly_____

David Conoly