

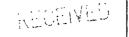
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PATRICK CLEVELAND: FIRST REQUEST FOR INFORMATION TO BEXAR RANCH, L.P.. - 1



THE TEXAS STATE OFFICE OF ADMINISTRATIVE HEARINGS 12 PM 1: 54

In re Application of the City of San Antonio, Acting By and Through the City Public Service Board (CPS Energy) To Amend its Certificate of Convenience and Necessity for the Proposed Scenic Loop 138-kV Transmission Line Project in Bexar County, Texas Docket Number: 51023

SOAH Docket No. 473-21-0247

PATRICK CLEVELAND'S FIRST REQUEST FOR INFORMATION TO BEXAR RANCH, L.P.

I, Patrick Cleveland, pursuant to 16 Tex. Admin. Code § 22.141 - § 22.144 and the parties' agreements made at the prehearing conference, respectfully request that you provide the following information and admissions of fact under oath.

Instructions

Please answer the attached questions on separate pages and copy the question immediately above the answer to each question. Following each answer, please identify the witness or witnesses who will sponsor each of your answers at the hearing in this PUC Docket No. 51023. These questions are continuing in nature and, should there be a change in circumstances that would modify or change any of your answers, then, in such case, please change or modify such answer and submit such changed answer as a supplement to the original answer within five (5) working days of your discovery that such change or modification is appropriate.

In answering these requests for information, you are requested to furnish such information as is available to you, including information which you are able to obtain by due diligence from your present or former attorneys, accountants, investigators, consultants, experts employees, agents, and persons acting on your behalf. To the extent any information responsive to a general question is also responsive to another more specific question, provide the information in response to the more specific request.



If you are unable to answer any request fully and completely after exercising due diligence to make inquiry and to secure information, you are to answer such request as fully and completely as you can and to specify the portions which you are unable to answer in such request. In addition to specifying those portions, you are to state with regard to each portion:

- 1. The fact on which you base the contention that you are unable to answer that portion.
- 2. The knowledge, information, and belief you have concerning that portion; and
- 3. The acts done and inquiries made by you in attempting to answer such request.

If any of the foregoing information is not available, state any other available means of identifying such document.

"associated with" means anyone living on Bexar Ranch, or the owners, members, or officers of Bexar Ranch, L.P. and any relatives of the owners, members or officers of Bexar Ranch, L.P.

"negotiation" means inquiries, discussions, statements, or suggestions.

"relatives" means anyone related by blood or through marriage

Request for Information

- 1. Please state whether anyone associated with Bexar Ranch, L.P. in the last seven years has ever entered into any negotiations with any other party regarding the sale of any part of Bexar Ranch and the following:
- a) The date of the negotiations;
- b) A summary of the negotiations;
- c) The names of the persons who were engaged in the negotiations;
- d) The general location and amount of property involved in the negotiation;

PATRICK CLEVELAND: FIRST REQUEST FOR INFORMATION TO BEXAR RANCH, L.P.. - 2

1	e) Whether the negotiations are continuing or have concluded and the outcome if they have
2	concluded;
3	f) Whether there are any existing or pending contracts in relation to any sale of any part of Bexa
4	Ranch, and if so, please provide copies of such contracts.
5	
6	
7	Respectfully submitted this 12th day of March 2021.
8	
9	/Patrick Cleveland/
10	Patrick Cleveland
11	State Bar #24101630
12	High Country Ranch 26332 Willoughby Way
13	Boerne, TX 78006 T. 908-644-8372
14	Email: pjbgw@gvtc.com
15	
16	CERTIFICATE OF SERVICE
17	
18	I certify that notice of the filing of this document was provided to all parties of record via
19	electronic mail on March 12, 2021, in accordance with the Order Suspending Rules, issued in Project No. 50664.
20	110ject 110. 30004.
21	
22	/Patrick Cleveland/
23	
24	Patrick Cleveland
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