



Control Number: 51156



Item Number: 5

Addendum StartPage: 0

RECEIVED

2020 NOV 30 PM 3:55

PUC DOCKET NO. 51156

PUBLIC UTILITY COMMISSION  
FILING CLERK

COMPLAINT OF SHANEKA L. BUSBY §  
BAKER AGAINST THE VERANDA §  
APARTMENTS AND DENTON PUBLIC §  
FACILITY CORPORATION §

PUBLIC UTILITY COMMISSION  
OF TEXAS

**NOTICE OF APPEARANCE ON BEHALF OF VERANDA APARTMENTS AND  
RESPONSE TO ORDER NO. 2**

TO THE HONORABLE ADMINISTRATIVE LAW JUDGE:

Pursuant to P.U.C. PROC. R. 22.101, Andres Medrano hereby files this Notice of Appearance as counsel on behalf of McKinney Denton Apartments Ltd. c/o Denton Public Facility Corporation for the Veranda Apartments in the above-referenced docket.

Any documents to be served on the Veranda Apartments and Denton Public Facility Corporation in the above referenced docket should be served upon the authorized representative named below.

**I. Authorized Representative**

Attorney Andres Medrano, pursuant to P.U.C. PROC. R. 22.101(a) notices appearance as counsel on behalf of McKinney Denton Apartments Ltd. c/o Denton Public Facility Corporation for the Veranda Apartments.

Andres Medrano  
State Bar No. 24005451  
(512) 542-7013  
(512) 542-7100 (Fax)  
[amedrano2@foley.com](mailto:amedrano2@foley.com)


FOLEY & LARDNER LLP  
600 Congress Avenue  
Suite 3000  
Austin, Texas 78701-2978

5

## **I. Response to Order No. 2**

Denton Apartments Ltd. c/o Denton Public Facility Corporation for the Veranda Apartments (Veranda) provides this Response to Order No. 2. Veranda recognizes that this response is filed after the required date of October 2, 2020, but respectfully requests leave for good cause to file on this date. Veranda's management has only recently been made aware of this complaint and will work expeditiously to resolve the matter. Veranda does not dispute the Commission's jurisdiction over this proceeding. The allegations raised in the complaint are being investigated and Veranda will cooperate with Commission Staff to provide all necessary information to reach a resolution of the complaint. Veranda has communicated with Commission Staff and requests time to provide detailed responsive information in an Amended Response to Order No. 2 by December 18, 2020. Veranda will also work with Commission Staff before that date to provide information needed for Commission Staff's recommendation as required by Order No. 2. Veranda has conferred with Commission Staff and the request for an extension of time to December 18, 2020, to provide a supplemental response is unopposed.

Respectfully submitted,

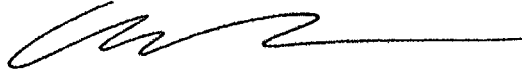


Andres Medrano  
Texas State Bar No. 24005451  
(512) 542-7013 (Direct)/542-7100 (fax)  
[amedrano2@foley.com](mailto:amedrano2@foley.com)

FOLEY & LARDNER LLP  
600 Congress Avenue  
Suite 3000  
Austin, Texas 78701-2978

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing instrument will be served on all parties of record in this proceeding in compliance with PUC rules and orders on November 30, 2020.

A handwritten signature in black ink, appearing to read 'Andres Medrano', written over a horizontal line.

Andres Medrano