



Control Number: 51222



Item Number: 29

Addendum StartPage: 0

RECEIVED

2021 MAR 29 PM 4:36

DOCKET NO. 51222

FILED BY: [unclear]
FR: [unclear]

APPLICATION OF THE ESTATE OF §
PATETREEN PETTY MCCOY DBA §
BIG WOOD SPRINGS WATER §
COMPANY AND CSWR-TEXAS §
UTILITY OPERATING COMPANY, §
LLC FOR SALE, TRANSFER, OR §
MERGER OF FACILITIES AND §
CERTIFICATE RIGHTS IN WOOD §
COUNTY §

PUBLIC UTILITY COMMISSION

OF TEXAS

**JOINT MOTION TO ADMIT EVIDENCE
AND PROPOSED ORDER APPROVING SALE AND TRANSFER TO PROCEED**

The Estate of Patetreen Petty McCoy dba Big Wood Springs Water Company (“Big Wood Springs”) and CSWR-Texas Utility Operating Company, LLC (“CSWR Texas”), together with the Staff of the Public Utility Commission of Texas (“Staff”) (collectively, “the Parties”), submit this Joint Motion to Admit Evidence and Proposed Order Approving Sale and Transfer to Proceed. In support thereof, the Parties show the following:

I. BACKGROUND

On August 27, 2020, Big Wood Springs filed an application with the Public Utility Commission of Texas (“Commission”) for approval of the sale, transfer, or merger of facilities and certificate rights in Wood County (“Application”). The Applicants seek to cancel Big Wood Springs’ water CCN number 12367 and to transfer all facilities and the service area held under CCN number 12367 to CSWR Texas to be held under water CCN number 13290. The requested sale and transfer includes approximately 643 acres and 76 connections.

Pursuant to Order No. 7, the Parties timely file this Joint Motion to Admit Evidence and Proposed Order Approving Sale and Transfer to Proceed.

II. JOINT MOTION TO ADMIT EVIDENCE

The Parties move to admit the following items into the record evidence of this proceeding:

1. Application, including confidential attachments, filed on August 27 and September 2, 2020 (Interchange Item Nos. 1 and 3 through 8);
2. CSWR Texas's First Supplement to Application, filed on October 15, 2020 (Interchange Item No. 12);
3. CSWR Texas's Second Supplement to Application, including confidential attachments, filed on January 8 and 11, 2021 (Interchange Item Nos. 18 and 20);
4. CSWR Texas's Affidavit of Notice to Current Customers, Neighboring Utilities, and Affected Parties, including confidential Exhibit B, filed on December 15, 2020 and January 12, 2021 (Interchange Item Nos. 16 and 21);
5. Staff's Recommendation on Sufficiency of Notice, filed on February 4, 2021 (Interchange Item No. 24); and
6. Staff's Recommendation on the Transaction, including confidential attachments, filed on March 11, 2021 (Interchange Item Nos. 26 and 27).

III. RESPONSE TO ORDER DIRECTING ADMINISTRATIVE PROCESS

On August 20, 2020, the administrative law judge ("ALJ") filed an Order Directing Administrative Process ("Processing Order") in each of the following dockets: Docket Nos. 50276, 50311, 50989, 51003, 51026, 51031, 51036, 51047, 51065, 51089, 51118, 51126, 51130, and 51146.¹ In the Processing Order, the ALJ indicated that the above-listed proceedings are

¹ *Application of North Victoria Utilities, Inc. and CSWR-Texas Utility Operating Company, LLC for Sale, Transfer, or Merger of Facilities and Certificate Rights in Victoria County*, Docket No. 50276, Order No. 8 (Aug. 20, 2020); *Application of Copano Heights Water Company and CSWR-Texas Utility Operating Company, LLC for Sale, Transfer, or Merger of Facilities and Certificate Rights in Aransas County*, Docket No. 50311, Order No. 8 (Aug. 20, 2020); *Application of Ranch Country of Texas Water Systems, Inc. and CSWR-Texas Utility Operating Company, LLC for Sale, Transfer, or Merger of Facilities and Certificate Rights in Austin County*, Docket No. 50989, Order No. 2 (Aug. 20, 2020); *Application of Oak Hill Ranch Estates Water and CSWR-Texas Utility Operating Company, LLC for*

“inextricably intertwined” and directed Staff to formulate its recommendations in each docket in a cumulative manner by also considering the recommendations it had already made in any other of the above-listed dockets in order to ensure that CSWR Texas has the wherewithal to serve each individual system as well as all systems as a whole.² This application was filed shortly after issuance of the Processing Order.

As demonstrated in its recommendation in this proceeding, Staff has performed a cumulative review to assess CSWR Texas’s technical and managerial capability to provide service to the requested area in this docket and all other dockets in which Commission Staff has recommended approval of CSWR Texas’s proposed transaction. Commission Staff has determined that CSWR Texas has demonstrated its ability to provide continuous and adequate service to each of the requested areas, both individually and as a whole. In addition, Staff

Sale, Transfer, or Merger of Facilities and Certificate Rights in Guadalupe and Wilson Counties, Docket No. 51003, Order No. 3 (Aug. 20, 2020); Application of Tall Pines Utility, Inc and CSWR-Texas Utility Operating Company, LLC for Sale, Transfer, or Merger of Facilities and Certificate Rights in Harris County, Docket No. 51026, Order No. 2(Aug. 20, 2020); Application of Council Creek Village, Inc. dba Council Creek Village dba South Council Creek 2 and CSWR-Texas Utility Operating Company, LLC for Sale, Transfer, or Merger of Facilities and Certificate Rights in Burnet County, Docket No. 51031, Order No. 3 (Aug. 20, 2020); Application of Kathie Lou Daniels dba Woodlands West and CSWR-Texas Utility Operating Company, LLC for Sale, Transfer, or Merger of Facilities and Certificate Rights in Burleson County, Docket No. 51036, Order No. 2 (Aug. 20, 2020); Application of Jones-Owen Company dba South Silver Creek I, II, and III and CSWR-Texas Utility Operating Company, LLC for Sale, Transfer, or Merger of Facilities and Certificate Rights in Travis County, Docket No. 51047, Order No. 2 (Aug. 20, 2020); Application of Treetop Utilities, Inc. and CSWR-Texas Utility Operating Company, LLC for Sale, Transfer, or Merger of Facilities and Certificate Rights in Parker County, Docket No. 51065, Order No. 4 (Aug. 20, 2020); Application of Donald E Wilson dba Quiet Village II dba QV Utility and CSWR-Texas Utility Operating Company for Sale, Transfer, or Merger of Facilities and Certificate Rights in Hidalgo County, Docket No. 51089, Order No. 2 (Aug. 20, 2020); Application of Shady Oaks Water Supply Company, LLC and CSWR-Texas Utility Operating Company, LLC for Sale, Transfer, or Merger of Facilities and Certificate Rights in Wilson County, Docket No. 51118, Order No. 5 (Aug. 20, 2020); Application of Shawn M. Horvath dba Aero Valley Water Service and CSWR-Texas Utility Operating Company, LLC for Sale, Transfer, or Merger of Facilities and Certificate Rights in Denton County, Docket No. 51126, Order No. 4 (Aug. 20, 2020); Application of Laguna Vista Limited and Laguna Tres, Inc. and CSWR-Texas Utility Operating Company, LLC for Sale, Transfer, or Merger of Facilities and Certificate Rights in Hood County, Docket No. 51130, Order No. 2 (Aug. 20, 2020); Application of Abraxas Corporation and CSWR-Texas Utility Operating Company, LLC for Sale, Transfer, or Merger of Facilities and Certificate Rights in Parker County, Docket No. 51146, Order No. 3 (Aug. 20, 2020). In addition, CSWR Texas has subsequently filed one additional STM application that was not addressed in the Processing Order. Application of the Estate of Patetreen Petty McCoy dba Big Wood Springs Water Company and CSWR-Texas Utility Operating Company, LLC for Sale, Transfer, or Merger of Facilities and Certificate Rights in Wood County, Docket No. 51222 (pending).

² Docket No. 51118, Processing Order at 6 (Aug. 20, 2020).

determined that CSWR Texas has the financial ability to pay for facilities necessary to provide service in each of the requested areas, both individually and as a whole.

IV. PROPOSED ORDER APPROVING SALE AND TRANSFER TO PROCEED

The Parties move for adoption of the attached Proposed Order Approving Sale and Transfer to Proceed.

V. CONCLUSION

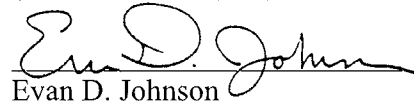
The Parties respectfully request that the Commission grant the Motion to Admit Evidence and adopt the attached Proposed Order Approving Sale and Transfer to Proceed.

Respectfully submitted,

**CSWR-TEXAS UTILITY OPERATING
COMPANY, LLC**

L. Russell Mitten
General Counsel
CSWR-Texas Utility Operating Company, LLC
1650 Des Peres Rd., Suite 303
St. Louis, MO 63131
(314) 380-8595
(314) 763-4743 (Fax)

By:



Evan D. Johnson
State Bar No. 24065498
Kate Norman
State Bar No. 24051121
C. Glenn Adkins
State Bar No. 24103097
Coffin Renner LLP
1011 W. 31st Street
Austin, Texas 78705
(512) 879-0900
(512) 879-0912 (fax)
evan.johnson@crtxlaw.com
kate.norman@crtxlaw.com
glenn.adkins@crtxlaw.com

**PUBLIC UTILITY COMMISSION OF
TEXAS LEGAL DIVISION**

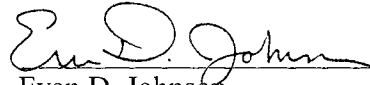
Rachelle Nicolette Robles
Division Director

Rashmin J. Asher
Managing Attorney

/s/ Kourtnee Jinks
Kourtnee Jinks
State Bar No. 24097146
1701 N. Congress Avenue
P.O. Box 13326
Austin, Texas 78711-3326
(512) 936-7265
(512) 936-7268 (fax)
kourtnee.jinks@puc.texas.gov

CERTIFICATE OF SERVICE

I hereby certify that on this 29th day of March 2021, notice of the filing of this document was provided to all parties of record via electronic mail in accordance with the Order Suspending Rules, issued in Project No. 50664.


Evan D. Johnson

DOCKET NO. 51222

APPLICATION OF THE ESTATE OF	§	
PATETREEN PETTY MCCOY DBA BIG	§	PUBLIC UTILITY COMMISSION
WOOD SPRINGS WATER COMPANY	§	
AND CSWR-TEXAS UTILITY	§	OF TEXAS
OPERATING COMPANY, LLC FOR	§	
SALE, TRANSFER, OR MERGER OF	§	
FACILITIES AND CERTIFICATE	§	
RIGHTS IN WOOD COUNTY	§	

**PROPOSED ORDER APPROVING SALE AND
TRANSFER TO PROCEED**

This Order addresses the application of The Estate of Patetreen Petty McCoy dba Big Wood Springs Water Company and CSWR-Texas Utility Operating Company, LLC for the sale, transfer, or merger of facilities and certificate rights in Wood County. Big Wood Springs and CSWR Texas seek the sale and transfer of all facilities and service area held under Big Wood Springs' water certificate of convenience and necessity (CCN) number 12367 to CSWR Texas, the cancellation of Big Wood Springs' water CCN number 12367, and the amendment of CSWR Texas's water CCN number 13290 to include the area previously included in Big Wood Springs' water CCN number 12367. The administrative law judge (ALJ) grants that the sale is approved and the transaction between Big Wood Springs and CSWR Texas may proceed and be consummated.

I. Findings of Fact

The Commission makes the following findings of fact.

Applicants

1. Big Wood Springs is an investor-owned utility that operates, maintains, and controls facilities for providing water service in Wood County under CCN number 12367.
2. Big Wood Springs owns and operates a public water system registered with the Texas Commission on Environmental Quality (TCEQ) as Big Wood Springs, public water system number 2500019.
3. CSWR Texas is a Texas limited liability company registered with the Texas secretary of state under file number 0803367893.

Application

4. On August 27, 2020, Big Wood Springs and CSWR Texas filed the application at issue in this proceeding.
5. Big Wood Springs and CSWR Texas filed supplements to the application on October 15, 2020, January 8, 2021 and confidentially under seal on January 11, 2021.
6. In the application, Big Wood Springs and CSWR Texas seek approval of the following transaction: (a) CSWR Texas will acquire all of Big Wood Springs' water facilities and water service area under water CCN number 12367; (b) Big Wood Springs' water CCN number 12367 will be cancelled; and (c) CSWR Texas's water CCN number 13290 will be amended to include the area previously included in Big Wood Springs's water CCN number 12367.
7. The requested water service area is comprised of 643 acres and 76 total connections.
8. The 643 acre requested area is located 8.6 miles southeast of downtown Winnsboro, Texas, and is generally bounded on the north and east by North Farm to Market 2869; on the south by County Road 3990; and on the west by Big Woods Spring Lake and Private Road 8693.
9. In Order No. 4 filed on November 6, 2020, the ALJ found the application administratively complete.

Notice

10. On December 15, 2020, CSWR Texas filed the affidavit of Josiah Cox, President and Manager of CSWR Texas, attesting that notice was provided to all current customers of Big Wood Springs, neighboring utilities, and affected parties on December 3, 2020.
11. In Order No. 6 filed on February 8, 2021, the ALJ found the notice sufficient.

Evidentiary Record

12. On March 29, 2021, the parties filed a joint motion to admit evidence.
13. In Order No. __ filed on _____, 2021, the ALJ admitted the following into evidence (a) the application, including confidential attachments, filed on August 27 and September 2, 2020; (b) CSWR Texas' first supplement to the application filed on October 15, 2020; (c) CSWR Texas's second supplement to the application, including confidential attachments filed on January 8 and 11, 2021 (c) CSWR Texas' affidavit of notice to current customers, neighboring utilities, and affected parties, including confidential Exhibit B, filed on December 15, 2020 and January 12, 2021; (e) Commission

Staff's recommendation on sufficiency of notice filed on February 4, 2021; and (f) Commission Staff's recommendation on the transaction, including confidential attachments, filed on March 11, 2021.

Cumulative Recommendation

14. In Order No. 1 filed on September 1, 2020, the ALJ directed Commission Staff to cumulatively consider all CSWR Texas related dockets involving the sale, transfer, or merger of public water systems. When formulating its recommendation, the ALJ specifically required Commission Staff to consider whether CSWR Texas had adequate, financial, managerial, and technical capability for providing continuous and adequate service the systems being transferred as a whole rather than on an individual basis.
15. On March 11, 2021 Commission Staff filed its recommendation on the transaction in this docket recommending that CSWR Texas has the financial, managerial, and technical capability to provide continuous and adequate service to all areas included in this docket and Docket Nos. 50251,¹ 50276,² 50311,³ 50989,⁴ 51026,⁵ 51031,⁶ 51047,⁷ 51065,⁸

¹ *Application of JRM Water LLC and CSWR Texas Utility Operating Company, LLC For Sale, Transfer, or Merger of Facilities and Certificate Rights in Victoria County*, Docket No. 50251, Notice of Approval (Mar. 12, 2021).

² *Application of North Victoria Utilities, Inc. and CSWR Texas Utility Operating Company, LLC for Sale, Transfer, or Merger of Facilities and Certificate Rights in Victoria County*, Docket No. 50276, Notice of Approval (Mar. 11, 2021).

³ *Application of Copano Heights Water Company and CSWR Texas Utility Operating Company, LLC for Sale, Transfer, or Merger of Facilities and Certificate Rights in Aransas County*, Docket No. 50311, Notice of Approval (Mar. 17, 2021).

⁴ *Application of Ranch Country of Texas Water Systems, Inc. and CSWR Texas Utility Operating Company, LLC for Sale, Transfer, or Merger of Facilities and Certificate Rights in Austin County*, Docket No. 50989 (pending)

⁵ *Application of Tall Pines Utility, Inc. and CSWR Texas Utility Operating Company, LLC for Sale, Transfer, or Merger of Facilities and Certificate Rights in Harris County*, Docket No. 51026 (pending)

⁶ *Application of Council Creek Village, Inc. dba Council Creek Village dba South Council Creek 2 and CSWR Texas Utility Operating Company, LLC for Sale, Transfer, or Merger of Facilities and Certificate Rights in Burnet County*, Docket No. 51031 (pending).

⁷ *Application of Jones-Owen Company dba South Silver Creek I, II, and III and CSWR Texas Utility Operating Company, LLC for Sale, Transfer, or Merger of Facilities and Certificate Rights in Travis County*, Docket No. 51047 (pending).

⁸ *Application of Treetop Utilities, Inc. and CSWR Texas Utility Operating Company, LLC for Sale, Transfer, or Merger of Facilities and Certificate Rights in Parker County*, Docket No. 51065, Notice of Approval (Mar. 10, 2021).

51118,⁹ 51130,¹⁰ 51146,¹¹ 51089,¹² 51003,¹³ and 51036.¹⁴

System Compliance—Texas Water Code (TWC) § 13.301(e)(3)(A); 16 Texas Administrative Code (TAC) §§ 24.227(a), 24.239(h)(3)(A), (h)(5)(I)

16. Big Wood Springs' public water system number 2500019 is currently in compliance with the rules of the TCEQ.
17. CSWR Texas has demonstrated a compliance history that is adequate for approval of the sale to proceed.

Adequacy of Existing Service—TWC § 13.246(c)(1); 16 TAC §§ 24.227(e)(1), 24.239(h)(5)(A)

18. There are currently 76 connections in the 643-acre requested area that is being served by Big Wood Springs through public water system number 2500019, and such service has been continuous and adequate.

Need for Additional Service—TWC § 13.246(c)(2); 16 TAC §§ 24.227(e)(2), 24.239(h)(5)(B)

19. There is a continuing need for service because Big Wood Springs is currently serving 76 existing water connections in the 643-acre requested area.
20. This is an application to transfer only existing facilities, customers, and service area. There have been no specific requests for additional service within the 643-acre requested area.

Effect of Approving the Transaction and Granting the Amendment—TWC § 13.246(c)(3); 16 TAC §§ 24.227(e)(3), 24.239(h)(5)(C)

21. Approving the sale and transfer to proceed and granting the CCN amendment will obligate CSWR Texas to provide water service to current and future customers in the 643-acre requested area.

⁹ Application of Shady Oaks Water Supply Company, LLC and CSWR Texas Utility Operating Company, LLC for Sale, Transfer, or Merger of Facilities and Certificate Rights in Wilson County, Docket No. 51118, Notice of Approval (Mar. 18, 2021)

¹⁰ Application of Laguna Vista Limited and Laguna Tres, Inc and CSWR Texas Utility Operating Company, LLC for Sale, Transfer, or Merger of Facilities and Certificate Rights in Hood County, Docket No. 51130 (pending)

¹¹ Application of Abraxas Corporation and CSWR Texas Utility Operating Company, LLC for Sale, Transfer, or Merger of Facilities and Certificate Rights in Parker County, Docket No. 51146 (pending).

¹² Application of Donald E Wilson dba Quiet Village II dba QV Utility and CSWR Texas Utility Operating Company, LLC for Sale, Transfer, or Merger, of Facilities and Certificate Rights in Hidalgo County, Docket No. 51089 (pending).

¹³ Application of Oak Hill Ranch Estates Water Company and CSWR Texas Utility Operating Company, LLC for Sale, Transfer, or Merger of Facilities and Certificate Rights in Guadalupe and Wilson Counties, Docket No. 51003 (pending).

¹⁴ Application of Kathie Lou Daniels dba Woodlands West and CSWR Texas Utility Operating Company, LLC for Sale, Transfer, or Merger of Facilities in Burlison County, Docket No. 51036 (pending).

22. Because this application is to transfer only existing facilities, customers, and service area, there will be no effect on any other retail public utility servicing the proximate area.
23. There will be no effect on landowners as the area are currently certificated.
24. CSWR Texas will adopt Big Wood Springs' current rates upon the consummation of the transaction.

Ability to Serve: Managerial and Technical—TWC §§ 13.241(a), (b), (c), 13.246(c)(4), 13.301(b), (e)(2); 16 TAC §§ 24.227(a), (e)(4), 24.239 (e), (h)(5)(D)

25. Big Wood Springs' public water system number 2500019 is currently providing water service to the 643-acre requested area with adequate capacity to meet the demands in the requested area.
26. CSWR Texas employs TCEQ-licensed operators who will operate the public water system.
27. CSWR Texas has access to an adequate supply of water and is capable of providing water service that meets the requirements of chapter 341 of the Texas Health and Safety Code, chapter 13 of the TWC, and the TCEQ's rules.
28. CSWR Texas has the technical and managerial capability to provide adequate and continuous service to the 643-acre requested area.

Ability to Serve: Financial Ability and Stability—TWC §§ 13.241(a), 13.246(c)(6), 13.301(b); 16 TAC §§ 24.11(e), 24.227(a), (e)(6), 24.239(e), (h)(5)(F)

29. CSWR, LLC, the immediate parent company of CSWR Texas, is capable, available, and willing to cover temporary cash shortages, and has a debt-to-equity ratio of less than one, satisfying the leverage test.
30. CSWR, LLC provided a written guarantee of coverage of temporary cash shortages and demonstrated that it has sufficient cash available to cover any projected operations and maintenance shortages in the first five years of operations after completion of the transaction and possesses the cash and leverage ability to pay for capital improvements and necessary equity investments—satisfying the operations test.
31. CSWR Texas demonstrated the financial ability and stability to provide continuous and adequate service to the 643-acre requested area.

Financial Assurance—TWC §§ 13.246(d), 13.301(c); 16 TAC §§ 24.227(f), 24.239(f)

32. There is no need to require CSWR Texas to provide a bond or other financial assurance to ensure continuous and adequate service.

Feasibility of Obtaining Service from Adjacent Retail Public Utility TWC § 13.246(c)(5); 16 TAC §§ 24.227(e)(5), 24.239(h)(5)(E)

33. The requested area is currently being served by Big Wood Springs, and there will be no changes to land uses or existing CCN boundaries. Therefore, it is not feasible to obtain service from another utility.

Environmental Integrity and Effect on the Land—TWC § 13.246(c)(7), (c)(9); 16 TAC §§ 24.227(e)(7), (e)(9), 24.239(h)(5)(G)

34. The 643-acre requested area will continue to be served with existing infrastructure.
35. There will be minimal effects on environmental integrity and on the land as a result of CSWR Texas's planned upgrades, renovations, and repairs to the public water system.

Improvement in Service or Lowering Cost to Consumer—TWC § 13.246(c)(8); 16 TAC §§ 24.227(e)(8), 24.239(h)(5)(H)

36. CSWR Texas will continue to provide water service to the existing customers in the requested area and the rates charged will not change as a result of the proposed transaction.

Regionalization or Consolidation—TWC § 13.241(d); 16 TAC § 24.227(b)

37. CSWR Texas will not need to construct a physically separate water system to continue serving the requested area; therefore, concerns of regionalization or consolidation do not apply.

II. Conclusions of Law

The Commission makes the following conclusions of law.

1. Big Wood Springs and CSWR Texas provided notice of the application that complies with TWC §§ 13.246 and 13.301(a)(2) and 16 TAC § 24.239.
2. After consideration of the factors in TWC § 13.246(c), CSWR Texas has demonstrated adequate financial, managerial, and technical capability for providing continuous and adequate service to the requested area as required by TWC § 13.301(b).
3. Big Wood Springs and CSWR Texas demonstrated that the sale of Big Wood Springs' water facilities and the transfer of the water service area held under CCN number 12367 from Big Wood Springs to CSWR Texas will serve the public interest and is necessary for the service, accommodation, convenience, and safety of the public as required by TWC § 13.301(d) and (e).

III. Ordering Paragraphs

In accordance with these findings of fact and conclusions of law, the Commission issues the following orders.

1. The sale is approved and the transaction between Big Wood Springs and CSWR Texas may proceed and be consummated.
2. As soon as possible after the effective date of the transaction, but not later than 30 days after the effective date, Big Wood Springs and CSWR Texas must file proof that the transaction has been consummated and customer deposits, if any, have been addressed.
3. Big Wood Springs and CSWR Texas have 180 days to complete the transaction.
4. Under 16 TAC § 24.239(m), if the transaction is not consummated within this 180-day period, or an extension is not granted, this approval is void and Big Wood Springs and CSWR Texas will have to reapply for approval.
5. Big Wood Springs and CSWR Texas are advised that the 643-acre requested area and associated facilities will remain under CCN number 12367 and be held by Big Wood Springs until the sale and transfer transaction is complete, in accordance with Commission rules.
6. In an effort to finalize this case as soon as possible, Big Wood Springs and CSWR Texas must continue to file monthly updates regarding the status of the closing and submit documents evidencing that the transaction was consummated.
7. Within 15 days following the filing of the applicants’ proof that the transaction has been consummated and customer deposits, if any, have been addressed, Commission Staff must file a recommendation regarding the sufficiency of the documents and propose a schedule for continued processing of this docket.

Signed at Austin, Texas the ___ day of _____ 2021.

PUBLIC UTILITY COMMISSION OF TEXAS

ADMINISTRATIVE LAW JUDGE