



Control Number: 51224



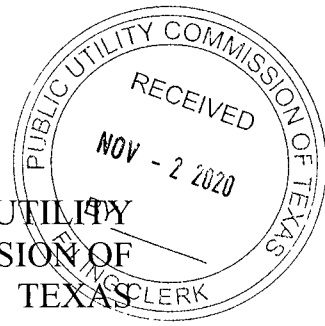
Item Number: 28

Addendum StartPage: 0

DOCKET: 51224

COMPLAINT OF JOHN
BLALOCK AGAINST
MERCY WATER
SUPPLY
CORPORATION

PUBLIC UTILITY
COMMISSION OF
TEXAS
CLERK



DISCOVERY REQUEST #1

WHAT IS THE REQUEST FOR

This discovery request is for the complete records pertaining to the meter located on the Southern Tract, but was installed for the service of the Northern Tract. This includes, but not limited to, any and all payments made on the original account for Reba Ivey, any and all documents signed by Reba Ivey or Gloria Ann Meeks, the minutes from the board meeting that was conducted in order to terminate the original account for Reba Ivey (which Mercy has claimed is now what happened with the account), the minutes from the board meetings when the board authorized the transfer of membership (that Mercy original claimed happened) to Mr. Rodz, and all other documentation for the meter since it's installment in 1995.

WHO IS THE REQUEST FOR

This request is aimed at Mercy Water Supply Corporation. They are the only ones with access to the records requested.

25

**DOES THIS REQUEST MEET THE REQUIREMENTS ORDERED
BY THE COMMISSION**

Yes, this request meets the requirements set by the Commission. It also counts as a single request, since only one thing is being requested. That one item is the complete record for the meter in question. These records would help the Public Utility Commission have a complete record of the meter instead of partial information pertaining to the meter in question. The records would also show that Mr. Blalock has been paying the bill for the meter at times before Reba Ivey's passing in 2015, and that Mr. Blalock had been paying the bill either in person or online after his mother's passing in 2015. The records would also show that there has not been a meeting to approve the transfer of membership to Mr. Rodz, and that there has not been a board meeting to approve the termination of Reba Ivey's account before the Informal Complaint, and consequentially the Formal Complaint, with the Public Utility Commission arose. All of this would pertain to the complaint before the Public Utility Commission as required by the requirements put forth by the Commission.

REQUEST FOR RELIEF

Mr. Blalock respectfully request that Mercy Water Supply Corporation be ordered to turn over the complete record, in its entirety with no redactions being made.