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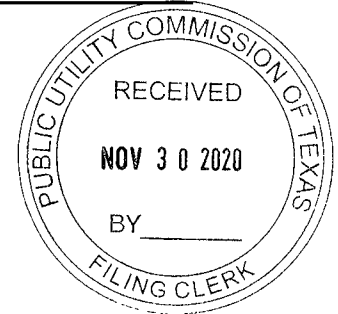
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**JOHN BLALOCK'S RESPONSE TO 'MERCY WATER SUPPLY
CORPORATION'S FIRST REQUEST FOR INFORMATION TO**

COMPLAINANT'

ANSWERS TO RFIS



RFI 1-1

RFI: “Please identify the addresses, physical locations, and dates of residence for each place you lived between August 1, 1995 and March 17, 2020.”

ANSWER: Mr. Blalock objects to ‘RFI 1-1’ on the basis that it is not within the limitations set in Order No. 7, since where he has lived has nothing to do with Mercy Water Supply Corporation’s service to the Northern and Southern Tracts, nor the facilities directly used to provide such service. And, it would have no weight on the complaint before the Public Utility Commission.

RFI 1-2

RFI: “Please identify the water provider(s) you received service from for each location identified in your answer to Request for Information (RFI) 1-1.”

ANSWER: Mr. Blalock objects to ‘RFI 1-2’ on the basis that it is not within the limitations set by Order No. 7, since the water providers Mr. Blalock has received service from in reference to the locations he has lived (RFI 1-1) has

nothing to do with Mercy's service to the Northern and Southern Tracts, nor the facilities directly used to provide such service. And would have no weight on the complaint before the Public Utility Commission.

Witness: John Preston Blalock II

RFI 1-3

RFI: "Please identify when you received service from Mercy and the applicable dates and locations for such service from August 1st, 1995 and March 17th, 2020."

ANSWER: Mr. Blalock began being the sole individual, by legal standards, after his mother, Reba Ivey, passed on the 22nd day of January of 2015. The service was just kept under Reba Ivey's name.

RFI 1-4

RFI: "Please describe any communication between you and anyone regarding Mercy's service to the Northern Tract."

ANSWER: Mr. Blalock objects to 'RFI 1-4' as it is in its current form as it could include private conversations that would not be included in the limitations set in Order No. 7, as private conversations with friends/family/neighbors/etc

would not be within the limitations, nor have weight on the complaint before the Public Utility Commission.

WITNESS: John Preston Blalock II

RFI 1-5

RFI: “Please provide any documents relating to your answer to RFI 1-4.”

ANSWER: RFI 1-4 was not able to be answered in its current form, so there would be no need at this time to include any documentation asked for in RFI 1-5.

WITNESS: John Preston Blalock II

RFI 1-6

RFI: “Admit or deny that a mobile home, trailer, or other similar structure or accommodation was located on the Southern Tract at any time between August 1, 1995 and March 17, 2020.”

ANSWER: Mr. Blalock objects to ‘RFI 1-6’ on the basis that it is not within the limitations set by Order No. 7, since any type of structure that may or may not have been on the Southern Tract has nothing to do with Mercy Water Supply Corporation’s service to the Northern and Southern Tracts, nor the facilities directly used for such service. And, it would have no weight on the complaint before the Public Utility Commission.

WITNESS: John Preston Blalock II

RFI 1-7

RFI: “Please identify the dates that a mobile home, trailer, or similar structure or accommodation was located on the Southern Tract from August 1, 1995 and March 17, 2020.”

ANSWER: Please see answer to ‘RFI 1-6’.

WITNESS: John Preston Blalock II

RFI 1-8

RFI: “Admit or Deny that you have resided or lived on the Southern Tract.”

ANSWER: Mr. Blalock objects to ‘RFI 1-8’ on the basis that it is not within the limitations set in Order No. 7, since where Mr. Blalock has lived or not lived has nothing to do with Mercy Water Supply Corporation’s service to the Northern and Southern Tracts, nor with the facilities directly used for such service. And, would have no weight on the complaint before the Public Utility Commission.

WITNESS: John Preston Blalock II

RFI 1-9

RFI: “If your answer to RFI 1-8 is admit, identify the dates of your residence on the Southern Tract; identify the persons that were parties to and/or witnesses of

your residence on the Southern Tract; describe where and how it took place; and identify any document that constitutes or refers to your residence on the Southern Tract. If your answer is anything else than admit, please describe in detail the basis for your answer.”

ANSWER: Please see ‘ANSWER’ under ‘RFI 1-8’.

WITNESS: John Preston Blalock II

RFI 1-10

RFI: “Please describe how the Southern Tract obtained water service from August 1, 1995 and March 17, 2020.”

ANSWER: By definition of water service [Texas Water Code 13.002(21)], the Southern Tract has never received water service.

WITNESS: John Preston Blalock II

RFI 1-11

RFI: “Please provide any documents relating to your answer to RFI 1-10.”

ANSWER: Mr. Blalock cannot provide any documents, as there would be no documentation proving there has never been water service to the Southern Tract.

WITNESS: John Preston Blalock II

RFI 1-12

RFI: “Admit that the water service line for the Northern Tract crosses the Southern Tract. If deny, describe in detail the route this service line follows.”

ANSWER: Mr. Blalock admits that the water service line does cross the Southern Tract.

WITNESS: John Preston Blalock II

RFI 1-13

RFI: “Admit that there is no recorded easement for the water service line that crosses the Southern Tract to serve the Northern Tract. If deny, produce any documents relating to the water service line and easement.”

ANSWER: Mr. Blalock has written a witness statement to the fact that there was an oral easement between Gloria Ann Meeks and Reba Ivey, which will be included with this response. And, the fact that Gloria Ann Meeks signed an easement with Mercy for the meter to be installed while not receiving water service to her tract of land, lends to the notion that there was an easement granted to her sister, Reba Ivey.

WITNESS: John Preston Blalock II

RFI 1-14

RFI: “In Response to Mercy’s Response to Complaint, filed September 24, 2020, you refer to “connections” to the service line that connects the meter on the Southern Tract to the house on the Northern Tract. Please describe in detail the location of all service line faucets or “connections”.”

ANSWER: There was only one connection/faucet to the service line that connects the meter on the Southern Tract to the house on the Northern Tract. It was destroyed by workers hired by Adrian Rodz, and completely taken out by Mr. Blalock when he and his son did a minor repair to the line in the spot it was damaged by taking out the ‘t’ connector that connected the faucet to the service line in question, and replaced the pipe only have collars on both ends of the pipe. Before that, the faucet was used as a connection for a water hose to use to water animals kept on the Southern Tract and for fire control when Mr. Blalock would burn garbage on the Southern Tract, when he still believed the property to be his.

WITNESS: John Preston Blalock II

RFI 1-15

RFI: “In your Response to Mercy’s Response to Complaint, filed September 24, 2020, you refer to “connections” to the service line that connects the meter on the Southern Tract to the house on the Northern Tract. Please describe in detail

when, how, and by who the faucets or “connections” to the service line were installed.”

ANSWER: Mr. Blalock cannot remember when the faucets or “connections” to the service line were installed. But, the faucets/connections were installed by him and his neighbor.

WITNESS: John Preston Blalock II

RFI 1-16

RFI: “In your Response to Mercy’s Response to Complaint, filed September 24, 2020, you refer to Southern Tract “connections” to the service line that connects the meter on the Southern Tract to the house on the Northern Tract. Please describe all purposes for which the faucets or “connections” to the service line, including those on the Southern Tract, have been used between August 1, 1995 and March 17, 2020.

ANSWER: Please see answer to ‘RFI 1-14’.

WITNESS: John Preston Blalock II

RFI 1-17

RFI: “In your Response to Mercy’s Response to Complaint, filed September 24, 2020, you stated you believed that you had owned the Southern Tract. Please

identify, describe, and produce any documents relating to your belief the Northern and Southern Tracts were combined into one property.”

ANSWER: Mr. Blalock objects to ‘RFI 1-17’ on the basis that it is not within the limitations set by Order No. 7, since Mr. Blalock’s ability to support the belief that he held ownership of, or had legal claim to, the Southern Tract, or that it had been combined with the Northern Tract into one property has nothing to do with Mercy Water Supply Corporation’s service to the Northern and Southern Tracts, nor with the facilities directly used to provide such service. And, would have no weight on the complaint before the Public Utility Commission.

WITNESS: John Preston Blalock II

RFI 1-18

RFI: “In your Response to Mercy’s Response to Complaint, filed September 24, 2020, you stated you believed that you had owned the Southern Tract. Please describe any ownership interest you had in the Southern Tract between August 1, 1995 and March 17, 2020, and produce any documents relating to your interest in the Southern Tract.”

ANSWER: Please see answer to ‘RFI 1-17’.

WITNESS: John Preston Blalock II

RFI 1-19

RFI: “For the purposes of this RFI, “Gloria Meeks” and “Gloria Hales” refers to the person referenced in the Partition Deed and Right-of-Way Easement filed as Exhibits D and F, respectively, to Mercy’s Response to Complaint (Sept. 24, 2020). Please describe your relationship to Gloria Meeks and Gloria Hales, and any ownership interest you believed she had in the Northern Tract.

ANSWER: See ‘Answer’ under ‘RFI 1-17’

WITNESS: John Preston Blalock II

RFI 1-20

RFI: “For the purposes of this RFI, “Ms.Reva Ivey” refers to the individual who signed the Service Agreement filed as Exhibit E to Mercy’s Response to Complaint (Sept. 24, 2020). Please describe your relationship to Ms. Reba Ivey and any ownership interest you believed she had in the Southern Tract.”

ANSWER: See ‘ANSWER’ under ‘RFI 1-17’

WITNESS: John Preston Blalock II

RFI 1-21

RFI: “Please produce any documents relating to your ownership of the Northern and Southern Tracts.”

ANSWER: These documents have already been requested by the Public Utility Commission.

WITNESS: John Preston Blalock II

RFI 1-22

RFI: “For the purposes of this RFI, “Ms. Reva Ivey” refers to the individual who signed the Service Agreement filed as Exhibit E to Mercy’s Response to Complaint (Sept. 24, 2020). Please identify, describe, and produce any verbal or written notices you received or have knowledge of related to a full or partial liquidation of Ms. Reba Ivey’s Membership and any steps you may have taken as a result.”

ANSWER: As per the requirements by the Public Utility Commission and the state of Texas, all forms of notices of terminations/cancelations, which a liquidation would be under, have to be done in writing. So, verbal notices would not be applicable to this complaint. And, Mr. Blalock has not received any written notices from Mercy Water Supply Corporation relating to a full or partial liquidation of Ms. Reba Ivey’s membership, but Mr. Blalock does have knowledge of the attempt to liquidate Ms. Reba Ivey’s Membership. Mr. Blalock has attempted to address that with the Board of Directors for Mercy Water Supply Corporation, along with the transfer of membership to Adrian Rodz.

WITNESS: John Preston Blalock II

RFI 1-23

RFI: “Describe in detail your understanding of the reason the meter that services the Northern Tract was installed on the Southern Tract.”

ANSWER: Mr. Blalock’s understanding of the reason the meter that services the Northern Tract was installed on the Southern Tract is that is where the Corporation (Mercy) decided to put it, as according to the ‘Service Agreement’, signed by Ms. Ivey, the Corporation is the one who chooses where the meter is installed. Mr. Blalock can only speculate on why Mercy decided to install the meter there, which he believes to be because that is as far as the pipes running from Mercy’s well ran at the time of the installation of the meter.

WITNESS: John Preston Blalock II

RFI 1-24

RFI: “Identify and produce any documents relating to your answer to RFI 1-23.”

ANSWER: The documents relating to Mr. Blalock’s answer to ‘RFI 1-23’ have already been submitted by Mercy multiple times and are on the Interchange website for the PUC.

WITNESS: John Preston Blalock II

CONCLUSION

All answers are provided by John Preston Blalock, and the validity of these answers can be supported by John Preston Blalock II.

/s/ John Preston Blalock

/s/ John Preston Blalock II

MR. BLALOCK'S WITNESS STATEMENT

Back in 1995, around the time that the meter in question was installed, a service line coming from the meter to the house on the property currently addressed 1611 Bowen Loop, Cleveland, Texas, but was 154 Bowen Road at the time of the instillation of the meter, was installed. My mother, Reba Ivey, and some of her family members, including Gloria Ann Meeks, dug the trench and laid the pipes for the service line. Gloria Ann Meeks gave her permission for the piping to be installed, and as stated before even helped in the instillation of said piping.

/s/ John Preston Blalock

30th day of November of 2020