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**COMPLAINT OF
JOHN BLALOCK
AGAINST MERCY
WATER SUPPLY
CORPORATION**

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COMMISSION OF
TEXAS**

RESPONSES AS REQUIRED BY ORDER NO. 9

COMES NOW John Blalock (hereinafter “Mr. Blalock”) to provide responses as required by Order No. 9 and to amend his response to RFI 1-13 to an explicit answer:

RFI 1-1

RESPONSE: As Mr. Blalock is being allowed to give approximate times and not being asked for exact times, he can give a further response to this Request for Information (hereinafter “RFI”). From August 1 of 1995 to January/February of 1996, Mr. Blalock was a long-haul driver but had his address listed as 154 Bowen Road (the Northern Tract) for legal document (e.g. W-2 forms). From January/February of 1996 to Summer of 1998, Mr. Blalock moved in and lived with Reba Ivey (hereinafter “Ms. Ivey”), his mother, in her residence on the Northern Tract. From the Summer 1998 to Spring 2001, Mr. Blalock moved into a trailer on the Southern Tract that had been moved in by Gloria Meeks’ (hereinafter “Ms. Meeks”) family in the months prior to her death in December of 1997. Spring 2001 to Winter 2001, Mr. Blalock’s first residence in Point Blank, Texas. Winter

2001 to Winter 2003, Mr. Blalock moved back to the aforementioned trailer on the Southern Tract. Summer 2005 to January 2015, Mr. Blalock moved a trailer onto the Southern Tract and moved into it. Then in January 2015, following Ms. Ivey's death Mr. Blalock moved into the residence on the Northern Tract.

RFI 1-4

RESPONSE: Mr. Blalock apologizes for his previous responses not having the full information as he only talks to his children on the phone and do not normally have to keep their address on hand as he knows how to drive where they live. The following is the information required for the individuals it is required for, and was not previously given as Mr. Blalock did not have it on hand.

Anastasia Blalock

ADDRESS: 9 Roy Webb Road, Dodge Texas

Ransom Blalock

ADDRESS: 13952 Old HWY 59 N #30, Splendora, Texas 77328

Kimberly Sanders

ADDRESS: 1611 Bowen Loop, Cleveland, Texas 77328

PHONE: Home: (832) 480-5371, Cell: (281) 796-9422

RFI 1-9

RESPONSE: Admit. See ‘RESPONSE’ under RFI 1-1 in this document for approximate dates.

ADMENDMENT TO RESPONSES TO RFI 1-13

As Mr. Blalock did not know an explicit answer would be needed, he would like to amend his response to the following:

RFI 1-13

RESPONSE: DENY. Mr. Blalock has submitted a witness statement filed with his original set of responses to Mercy’s first RFI to him, which would make the oral easement recorded by Mercy’s counsel’s definition of recorded as stated in their Second Motion to Compel, as it is a written statement of the oral easement and actions by Ms. Meeks that would imply that she (1) knew the pipes ran across her portion of the property and (2) had given Ms. Ivey, her sister, the permission to install the piping across her property. And, as Ms. Meeks had to sign an easement for the meter to be installed by Mercy for Ms. Ivey (the easement is included with records submitted by Mercy in response to RFI 1-1 from Mr. Blalock), it would be further implied that she (1) knew the piping would be needed because of the distance from the meter to the residence and (2) was in agreement for the piping to be installed.

CONCLUSION

Mr. Blalock has answered the questions to the best of his ability and in good faith.

All answers can be supported by Mr. Blalock's child, John Blalock II.

Respectfully Submitted By,

/s/ John Preston Blalock

/s/ John Preston Blalock II