



Control Number: 51224



Item Number: 60

Addendum StartPage: 0

RECEIVED

LETTER OF INTENT TO IMPEACH AND EXCLUDE WITNESSES

2021 JAN 21 11:12: 54

PUBLIC UTILITY COMMISSION
FILING CLERK

TO WHOM IT MAY CONCERN:

Mr. Blalock plans to file the proper motions following this letter before January 29th. Mr. Blalock has raised his concerns about the witnesses and their statements.

But, since a special counsel is outside of the ability of the Public Utility Commission, Mr. Blalock plans to use the same avenues that the Honorable Administrative Law Judge proposed Mercy Water Supply Corporation's counsel use against Mr. Blalock if they were not agreeable with his responses to certain Requests for Information.

Even though notice is not needed according to the Texas Rules of Evidence, Mr. Blalock believes that it would be unfair of him to spring this on the counsel for Mercy. And, as Mercy and their counsel have access to the written statements, Mr. Blalock is not required by the Rules of Evidence to provide a copy to them or the witnesses he plans to impeach and motion to exclude.

SUBMITTED RESPECTFULLY,

/s/ John Preston Blalock

66