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JOHN BLALOCK'S RESPONST TO MERCY WATER SUPPLY
CORPORATION'S REPLY TO COMPLAINANT'S MOTION TO
IMPEACH AND EXCLUDE WITNESSES

COMES NOW John Blalock (hereinafter "Mr. Blalock") to make his response to Mercy Water Supply Corporation's (hereinafter "Mercy") Reply to Complainant's Motion to Impeach and Exclude Witnesses:

I.

WHY MR. BLALOCK DIDN'T GO INTO DETAIL

Mr. Blalock did not go into detail as the Texas Rules of Evidence (hereinafter "TRE") Rule 613(a) and Rule 613(b) require a chance for the witness to be able to explain or deny the inconsistency or any bias/interest they may or may not have. And, Mr. Blalock understood this as he would have to wait for the explanation/denial before going into further detail. But Mr. Blalock did meet the specifics of what these rules state is needed in order to invoke them. Therefore, before Mr. Blalock can present any other evidence to the statements or go into greater detail, the witnesses would need to provide their explanation or denial.

II.

MR. BLALOCK'S MOTIONS TO EXCLUDE WITNESSES

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Mr. Blalock asked the for the Witnesses to be excluded as he believes they have a conflict of interest as depending on the outcome of this complaint, their jobs at Mercy may or may not be in jeopardy, which may or may not impede their ability to give full and truthful statements. And, Mr. Blalock also wrote his Motions to Exclude in a way that would imply that they should not be considered until after the impeachments under Rule 613(a) and Rule 613(b) are concluded.

Also, Kelley Allbright (hereinafter “Ms. Allbright”) and Randall Baker (hereinafter “Mr. Baker”) should not be considered material witnesses as many other individuals have been identified as having conversations with Mr. Blalock but would not automatically be considered material. And, once the impeachments are approved, Mr. Blalock can show how their bias or interest has already impeded their ability to provide full and truthful statements on this matter.

III.

REQUEST FOR RELIEF

Mr. Blalock respectfully request that his Motions to Impeach the Witnesses be allowed, and that his Motions to Exclude Witnesses be considered pending on the basis that they would not be able to be approved until after the cross examination of the witnesses be concluded.

RESPECTFULLY SUBMITTED BY,

/s/ John Preston Blalock