



## Filing Receipt

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COMPLAINT OF JOHN	SOAH DOCKET: 473-	PUBLIC UTILITY
BLALOCK AGAINST	21-1880. WS	COMMISSION OF
MERCY WATER		TEXAS
SUPPLY		
CORPORATION		

**JOHN BLALOCK RESPONSE TO MERCY WATER SUPPLY**  
**CORPORATION’S MOTION TO STRIKE**

COMES NOW Complainant John Blalock (hereinafter “Mr. Blalock”) to respond to the Motion to Strike filed by Mercy Water Supply Corporation (hereinafter “Mercy”) on the 15<sup>th</sup> Day of July of 2021:

**COMMISSION RULE 22.255**

Mr. Blalock could not have called the presiding officer as Mr. Blalock’s home phone requires a modem/gateway to work. Furthermore, Mr. Blalock would not have been able to write the presiding officer as sending a letter requires Mr. Blalock to purchase a stamp. And, as Mr. Blalock is on social security, he is limited on extra items he can buy outside of what he needs to pay such as bills, auto insurance, and items required by law or to survive. As such, Mr. Blalock providing a reasoning for the late testimony in the document containing his Direct Testimony did contact the presiding officer at the earliest opportunity he had as a copy of the filing would be provided to the presiding officer as well as all other

parties, thereby meeting the requirement of Commission Rule 22.255. The Commission Rule does not require the contact be made separately from the filing.

### **MERCY'S CLAIM FOR NOT HAVING ENOUGH TIME**

Mercy cannot claim to not have enough time to read and object to Mr. Blalock's Direct Testimony, while in the same document filing an Objection to Mr. Blalock's Direct Testimony. The filing of the Objection shows that Mercy's legal representation has been able to go through Mr. Blalock's Direct Testimony since the document being filed on the 12<sup>th</sup> day of July of 2021, thereby contradicting their claim.

### **REQUEST FOR RELIEF**

Mr. Blalock respectfully request that the ALJs deny Mercy their Motion to Strike as he has acted within the requirements for the Commission Rules to the best of his ability and with good faith.

RESPECTFULLY SUBMITTED BY,

/s/ John Blalock