



## Filing Receipt

**Received - 2021-07-26 12:33:08 PM**  
**Control Number - 51224**  
**ItemNumber - 98**

DOCKET: 51224

COMPLAINT OF JOHN

SOAH DOCKET: 473-

PUBLIC UTILITY

BLALOCK AGAINST

21-1880. WS

COMMISSION OF

TEXAS

MERCY WATER

SUPPLY

CORPORATION

**JOHN BLALOCK’S OBJECTIONS TO AND MOTION TO QUASH**  
**MERCY WATER SUPPLY CORPORATION’S FIRST SET OF REQUESTS**  
**FOR INFORMATION**

COMES NOW John Blalock (hereinafter “Mr. Blalock) to timely file his objections to and Motion for Mercy Water Supply Corporation’s (hereinafter “Mercy”) First Set of Requests for Information (hereinafter “RFI”) to be quashed;

**RFIs 1-1, 1-2, 1-3, 1-7, and 1-8**

In RFI 1-1 Mercy requested, “Please describe the telephone or other device you used to participate in the May 4, 2021 Zoom prehearing conference in this case.”

In RFI 1-2 Mercy requested, “Please describe the telephone or other device your child, Allie Blalock, used to participate in the May 4, 2021 Zoom prehearing conference in this case.”

In RFI 1-3 Mercy requested, “Please describe the telephone or other device you and your child, Allie Blalock, used to participate in the June 18, 2021 Zoom prehearing conference in this case.”

In RFI 1-7 Mercy requested, “In your prefiled direct testimony, you state that you did not have access to the internet from July 2-July 12. Please provide any documents related to your loss of internet access from July 2-12.”

In RFI 1-8 Mercy requested, “Please provide any communications between you and any person related to related to your loss of internet access from July 2-12, including communications with any internet service provider.”

These requests are only loosely tied to the case before the State office of Administrative Hearings and Mr. Blalock’s Direct Testimony, as they pertain to the first paragraph of the filing containing Mr. Blalock’s Direct Testimony, which is written before the Direct Testimony starts. Then, the evidence requested by Mercy through these requests would not pass the *Test of Relevance* set by Rule 401 of the Texas Rules of Evidence, as they only serve to try and disprove Mr.

Blalock's reasoning to why his Direct Testimony was delayed, not to bring into question any part of Mr. Blalock's Direct Testimony.

Mr. Blalock has attempted in good faith to get a clarification on the relevancy of the requests, but, at the time of this filing, Mercy's legal representation has not responded to the email (see attached email).

### **REQUEST FOR RELIEF**

Mr. Blalock respectfully request that his objections be sustained, and the requests be quashed.

RESPECTFULLY SUBMITTED BY,

/s/ John Blalock



Allie Blalock &lt;allieblalock97@gmail.com&gt;

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**Docket No. 51224 - Mercy WSC Second Request for Information to Complainant**2 messages

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**Grayson McDaniel** <grayson@carltonlawaustin.com>

Thu, Jul 22, 2021 at 1:56 PM

To: Allie Blalock &lt;allieblalock97@gmail.com&gt;, "Adkins, Justin" &lt;Justin.Adkins@puc.texas.gov&gt;

Cc: John Carlton &lt;John@carltonlawaustin.com&gt;

Dear Allie and Justin,

Please find attached a copy of Mercy Water Supply Corporation's Second Request for Information to Complainant, filed today in the above-captioned docket. Per our agreed procedural schedule the responses to this Request for Information are due ten days from today.

Best Regards,  
Grayson McDaniel

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Grayson E. McDaniel

The Carlton Firm, P.L.L.C.

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**2021.07.22\_Mercy WSC Second RFI to Complainant.pdf**

146K

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**Allie Blalock** <allieblalock97@gmail.com>

Thu, Jul 22, 2021 at 2:21 PM

To: Grayson McDaniel &lt;grayson@carltonlawaustin.com&gt;

Would you mind explaining the relevancy of RFIs 1-1, 1-2, 1-3, 1-7, and 1-8. As they have nothing to do with the direct testimony, as that information was not in the direct testimony but in the first paragraph of the filing containing the direct testimony.

[Quoted text hidden]