



## Filing Receipt

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DOCKET 51619

RESPONSE TO RESPONDENT'S MOTION FOR LEAVE TO SERVE  
DISCOVERY

10/11/21

**DOCKET NO. 51619**

**COMPLAINT OF JEFF CONNORS       §       PUBLIC UTILITY COMMISSION**  
**AGAINST THE GALLERY               §**  
**APARTMENTS, ROSCOE PROPERTY §               OF TEXAS**  
**MANAGEMENT, AND CONSERVICE §**

**RESPONSE TO RESPONDENT’S MOTION FOR LEAVE TO SERVE DISCOVERY**

Preliminary Comments

In this submittal I’ll Respond to the Respondent’s Motion for Leave to Serve Discovery that was filed in Item 35 of the Docket. This Motion begins on page 4 of that document.

Rebuttal to the Respondent’s grounds for the Motion

The Respondent put forth an inaccurate account of the events surrounding my Formal Complaint. As I covered in my Reply to Respondent’s to Formal Complaint also submitted today, when I filed my Formal Complaint on December 14, 2020 Roscoe hadn’t provided any documents to me though I’d made five requests to Roscoe for them and filed an Informal Complaint, which the PUC had closed in November after Roscoe hadn’t responded to that either. Second of all, as I pointed out in my Reply to Respondent’s Response to Formal Complaint, Roscoe has never provided to me *the total amount billed to all tenants each month and total revenues collected from the tenants each month to pay for water and wastewater service* that I’ve asked for and I’ve never requested any tenants’ private information to be included within it, nor is it necessary to include tenants’ private information within that info. I’ve requested that information within my original Formal Complaint (Item 1 page 8) and my Second Motion to Amend the Complaint as well (Item 9 page 30).

That Roscoe has “repeatedly offered (me) the damages (I) sought in a good faith effort to make (me) feel whole again” has no relevancy to this Motion. I’m not required to engage in settlement talks with Roscoe though I’ve received so much pressure to do so that one would think it was my civic duty when the actual facts of the matter are that Roscoe, a large property management company, systematically overcharged Gallery II tenants for a public utility and violated numerous PUC Rules in that process that are supposed to protect tenants from being overbilled and part of the PUC’s mission is to protect consumers.

As far as “unfounded assumptions” the Respondent’s claim I’ve made regarding Roscoe’s billing practices, if the Respondent disagrees with my claims then they should present evidence to clarify where I’m wrong. For instance, if the Respondent’s disagrees about my beliefs about Roscoe’s business relationship with Conservice and the services Conservice performed for Roscoe during the period that I was overbilled then the Respondent’s should clarify what they were and provide proof of it.

In regards to the Respondent’s call for equity in this situation because they haven’t had the opportunity to conduct Discovery, I filed mounds of evidence when I filed my Formal Complaint, which was over 60 pages and included text, bills, emails, snips from my lease, and photos. I was forced to file that Formal Complaint to pursue this matter because Roscoe overcharged me for water and then violated PUC Rules five times by ignoring my requests and thereby not living up to their duties to provide water billing information to tenants.

Finally, this is a consumer complaint process regarding a property management company overbilling a tenant and I don’t believe that this is the proper venue for the Respondent to be pursuing relief.

### Summary

I respectfully request that the Respondent’s Motion for Leave to Serve Discovery be denied.

I will email [frontdesk@roscoeproperties.com](mailto:frontdesk@roscoeproperties.com), [Service@conservice.com](mailto:Service@conservice.com), and [liu@hooverslovacek.com](mailto:liu@hooverslovacek.com) to inform them of this submission to the docket.

Respectfully submitted,

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