



## Filing Receipt

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<b>PETITION OF RODNEY EARL</b>	<b>§</b>	<b>PUBLIC UTILITY COMMISSION</b>
<b>MOHNKE, STEPHEN LEE MOHNKE,</b>	<b>§</b>	
<b>MELVIN MAX MOHNKE, KENNETH</b>	<b>§</b>	<b>OF TEXAS</b>
<b>WAYNE MOHNKE, KATHLEEN ANN</b>	<b>§</b>	
<b>MOHNKE-BLAKELY, AND MEL</b>	<b>§</b>	
<b>MOHNKE, TRUSTEES OF THE</b>	<b>§</b>	
<b>MOHNKE LIVING TRUST, TO</b>	<b>§</b>	
<b>AMEND H-M-W SPECIAL UTILITY</b>	<b>§</b>	
<b>DISTRICT'S CERTIFICATE OF</b>	<b>§</b>	
<b>CONVENIENCE AND NECESSITY IN</b>	<b>§</b>	
<b>HARRIS COUNTY BY EXPEDITED</b>	<b>§</b>	
<b>RELEASE</b>	<b>§</b>	

**PETITIONER'S SECOND MOTION TO COMPEL**

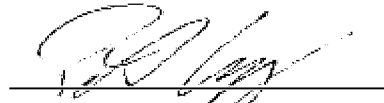
Rodney Earl Mohnke, Stephen Lee Mohnke, Melvin Max Mohnke, Kenneth Wayne Mohnke, Kathleen Ann Mohnke-Blakely and Mel Mohnke, Trustee of The Mohnke Living Trust dated December 7, 1996 ( the "Petitioner") hereby files this Second Motion to Compel. In support thereof, Petitioner shows the following.

The Commission approved Petitioner's application by order dated November 2, 2021 (Docket Id. No. 34). The order required, at Ordering Paragraph No. 6, that H-M-W file in this docket proof of the real property recording required in Tex. Water Code 13.257(r) and (s) within 45 days of the date of the order. To date, approximately three months following the order deadline, H-M-W has still failed to comply with the Commission order. The Petitioner has sought discussion with H-M-W regarding its failure to comply with the order on at least two occasions, in order to avoid this filing, but has received no response. H-M-W's delay in submitting the required filing in the real property records is resulting in incorrect title information regarding the property in the real property records and is complicating the Petitioner's ability to move forward with its plans for the property.

Accordingly, the Petitioner requests that the ALJ compel H-M-W to fulfill its obligations under Ordering Paragraph No. 6 and for such other relief as may be required.

Respectfully submitted,

**Gregg Law PC**



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Attorneys for Petitioners

### **CERTIFICATE OF SERVICE**

By my signature above, I certify that on the 17<sup>th</sup> day of March, 2022 the foregoing document was serviced via first class mail and/or email to the following:

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