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PETITION OF ROSE HILL SPECIAL	§	
UTILITY DISTRICT FOR A CEASE	§	BEFORE THE STATE OFFICE OF
AND DESIST ORDER AGAINST THE	§	
CITY OF TERRELL, TEXAS FOR	§	ADMINISTRATIVE HEARINGS
UNAUTHORIZED WATER SERVICE	§	

FIRST AMENDED RULE 11 AGREEMENT FOR EXTENSION OF TIME

COMES NOW, the City of Terrell (City) and Rose Hill Special Utility District (District), by and through their undersigned attorneys of record, and pursuant to Rule 11 of the Texas Rules of Civil Procedure, file as part of the record this First Amended Rule 11 Agreement for Extension of Time, advising the State Office of Administrative Hearings (SOAH) Administrative Law Judge (ALJ) of an agreement between the City and District to extend the deadlines to object to discovery.

I. BACKGROUND

On December 27, 2023, the City and Rose Hill filed a joint Rule 11 Agreement for Extension of Time. Pursuant to the Rule 11 Agreement, both parties must file objections to certain discovery requests by January 19, 2024 (the “*deadline to object*”). On January 18, 2024, the parties agreed to extend the deadline to object from January 19, 2024 to January 22, 2024. There are no other changes to the Rule 11 Agreement dated December 27, 2023.

Pursuant to 16 TAC § 22.144(k), the parties may modify deadlines for responses, objections, and motions to compel by agreement by filing a letter or other document evidencing the agreement. Due to the number and complexity of the parties’ discovery requests, the parties have agreed to the deadlines to object and respond provided herein.

II. AGREED DEADLINES

The City and District agree to the following amended deadlines to file objections and responses to the City’s First RFIs and Second RFIs and the District’s Second RFIs and Third RFIs, notwithstanding any objections, motions to compel, or rulings thereon:

Deadline for the District to object to the City’s RFIs 1-7 through 1-9	January 3, 2024
Deadline for the District to respond to the City’s RFIs 1-7 through 1-9	January 10, 2024

Deadline for the District to object to the City's First RFAs, RFIs 1-1 through 1-6 and 1-10 through 1-17, Second RFAs, and Second RFIs	January 22, 2024
Deadline for the City to object to the District's Third RFIs	January 22, 2024
Deadline for the District to respond to the City's First RFAs, RFIs 1-1 through 1-6 and 1-10 through 1-17, Second RFAs, and Second RFIs	January 29, 2024
Deadline for the City to supplement its response to District RFI 2-10, and respond to the District's RFIs 2-1 through 2-9 and Third RFIs	January 29, 2024

Respectfully submitted,

By: /s/ Sergio M. Estrada

Andrew S. "Drew" Miller
Drew.Miller@kempsmith.com
State Bar No. 00786857
Deborah C. Trejo
Deborah.Trejo@kempsmith.com
State Bar No. 24007004
Sergio M. Estrada
Sergio.Estrada@kempsmith.com
State Bar No. 24080886

KEMP SMITH LLP

2905 San Gabriel St,
Suite 205
Austin, TX 78705
(512) 320-5466
(512) 320-5431 (Fax)

**ATTORNEYS FOR ROSE HILL SPECIAL
UTILITY DISTRICT**

**LLOYD GOSSELINK ROCHELLE &
TOWNSEND, P.C.**

816 Congress Avenue, Suite 1900
Austin, Texas 78701
(512) 322-5800
(512) 472-0532 (Fax)

DAVID J. KLEIN
State Bar No. 24041257
dklein@lglawfirm.com

/s/ Danielle Lam
DANIELLE LAM
State Bar No. 24121709
dlam@lglawfirm.com

ATTORNEYS FOR THE CITY OF TERRELL

CERTIFICATE OF SERVICE

I certify that, unless otherwise ordered by the presiding officer, notice of the filing of this document was provided to all parties of record via electronic mail on January 18, 2024 in accordance with the Commission Order Suspending Rules, issued in Project No. 50664.

/s/ Sergio M. Estrada
Sergio M. Estrada