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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	§	

SECOND 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 Second 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, filed a joint First Amended Rule 11 Agreement extending the parties’ deadline to file objections to discovery from January 19, 2024 to January 22, 2024. On January 22, 2024, following the exchange of written communications and a teleconference to discuss the parties’ discovery objections and responses, as well as proposed resolutions, the parties have agreed to extend the existing January 22, 2024 deadlines to file objections to January 24, 2024, and the January 29, 2024 deadlines to respond to discovery to January 31, 2024, as reflected in the chart below.

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 24, 2024
Deadline for the City to object to the District's Third RFIs	January 24, 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 31, 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 31, 2024

Respectfully submitted,

By: /s/ Sergio M. Estrada

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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 22, 2024 in accordance with the Commission Order Suspending Rules, issued in Project No. 50664.

/s/ Sergio M. Estrada
Sergio M. Estrada