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**PUC DOCKET NO. 52310
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PETITION OF ROSE HILL SPECIAL	§	PUBLIC UTILITY COMMISSION
UTILITY DISTRICT FOR CEASE AND	§	
DESIST ORDER AGAINST THE CITY	§	OF TEXAS
OF TERRELL FOR UNAUTHORIZED	§	
WATER SERVICE	§	

ROSE HILL SPECIAL UTILITY DISTRICT'S
MOTION FOR EXTENSION OF TIME TO FILE ITS MOTION TO COMPEL
RESPONSES TO ROSE HILL'S SECOND SET OF REQUESTS FOR INFORMATION
TO CITY OF TERRELL

On October 14, 2022, Rose Hill Special Utility District ("Rose Hill") filed its Motion to Compel Responses to Rose Hill's Second Set of Requests for Information to the City of Terrell ("Motion to Compel"). As noted in that motion, due to a calculation error, Rose Hill's motion was filed *one day* beyond the time period set forth in 16 TEX. ADMIN. CODE ("TAC") § 22.144(e). This motion, filed pursuant to 16 TAC § 22.4(b) is to request a one-day extension of the time period set forth in 16 TAC § 22.144(e), so that Rose Hill's Motion to Compel may be considered timely filed.

The one day delay in filing of Rose Hill's Motion to Compel was caused solely by an inadvertent calculation error made by lead counsel for Rose Hill when first receiving the City's Objections to Rose Hill's Second Set of RFIs to City of Terrell. This delay, and the resulting need for extension was not caused by neglect or indifference, and therefore there is good cause for a one-day extension.

This calculation error was discovered after 2:00 PM on October 14, 2022. Counsel for Rose Hill immediately reached out to counsel for the City and Commission staff to see if those parties would be willing to agree to not oppose this motion. As of the filing of this motion for extension, undersigned counsel has not heard back from counsel for the City and Commission staff on that issue.

WHEREFORE, counsel for Rose Hill Special Utility District respectfully requests that this motion be granted and that the time period for filing Rose Hill's Motion to Compel be extended by one day to October 14, 2022.

Respectfully submitted,



By: _____

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**ATTORNEYS FOR ROSE HILL SPECIAL
UTILITY DISTRICT**

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing document was transmitted to counsel of record in this proceeding via email on October 14, 2022.

A handwritten signature in black ink, appearing to read "Drew Miller", is positioned above a horizontal line.

Andrew S. "Drew" Miller