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DOCKET NO. 52739

PETITION OF SATER, LP TO AMEND	§	PUBLIC UTILITY COMMISSION
MARILEE SPECIAL UTILITY	§	
DISTRICT’S CERTIFICATE OF	§	OF TEXAS
CONVENIENCE AND NECESSITY IN	§	
COLLIN COUNTY BY EXPEDITED	§	
RELEASE	§	

MARILEE SPECIAL UTILITY DISTRICT’S UNOPPOSED MOTION FOR EXTENSION OF TIME TO RESPOND TO COMMISSION STAFF’S FIRST REQUEST FOR INFORMATION QUESTION NOS. STAFF 1-1 THROUGH STAFF 1-11

TO THE HONORABLE ADMINISTRATIVE LAW JUDGE BURKHALTER:

COMES NOW, MARILEE SPECIAL UTILITY DISTRICT (the “District”) and files this, its Unopposed Motion for an Extension of Time to Respond to Commission Staff’s First Requests for Information Question Nos. 1-1 Through 1-11, which were filed on January 11, 2022, the “Discovery Requests”). The District respectfully requests that the deadline for responding to Commission Staff’s Discovery Requests be extended until March 10, 2022. The District has conferred with Commission Staff and counsel for Sater, LP, and neither are opposed to this request.

In support of this motion, the District respectfully shows as follows:

1. Due to a clerical error, counsel for the District has not been receiving filing notifications in this proceeding from the Public Utility Commission Interchange. The District’s counsel should have known, but did not know, that Commission Staff’s Discovery Requests, among other items, had been filed in this proceeding.
2. The District will file its verified response in this proceeding no later than March 4, 2022, as authorized in Order No. 7.¹
3. The District wishes to respond to Commission Staff’s Discovery Requests. The

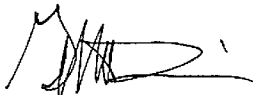
¹ Order No. 7 – Granting Extension (Feb. 14, 2022) (“If the CCN holder wishes to file any response to the petition and Commission Staff’s recommendation it must do so by March 4, 2022.”).

District requests the extension until March 10, 2022, to compile the information needed to fully respond to the Discovery Request.

4. The District does not make this motion to cause delay, but only to correct the error and create a more comprehensive record for this proceeding.

PRAYER

WHEREFORE, PREMISES CONSIDERED, the District respectfully requests the entry of an order extending the District's deadline to respond to Commission Staff's Discovery Requests to March 10, 2022.

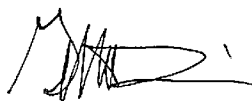
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ATTORNEYS FOR MARILEE SPECIAL
UTILITY DISTRICT

CERTIFICATE OF SERVICE

I hereby certify that I have served or will serve a true and correct copy of the foregoing document via hand delivery, facsimile, electronic mail, overnight mail, U.S. mail and/or Certified Mail Return Receipt Requested to all parties on this 24th day of February 2022.



Grayson E. McDaniel