



## Filing Receipt

**Received - 2022-09-06 11:29:43 AM**  
**Control Number - 52792**  
**ItemNumber - 25**

**PUC DOCKET NO. 52792**

<b>PETITION BY PETRUS INVESTMENT, L.P.</b>	<b>§</b>	<b>BEFORE THE</b>
<b>FOR EXPEDITED RELEASE FROM WATER</b>	<b>§</b>	
<b>CCN NO. 13201 HELD BY</b>	<b>§</b>	<b>PUBLIC UTILITY COMMISSION</b>
<b>AQUA TEXAS, INC. IN</b>	<b>§</b>	
<b>DENTON COUNTY</b>	<b>§</b>	<b>OF TEXAS</b>

**JOINT MOTION FOR EXTENSION OF TIME**

**TO THE PUBLIC UTILITY COMMISSION OF TEXAS:**

Petrus Investment, L.P. (“Petitioner”) and Aqua Texas, Inc. (“Aqua”) (jointly the “Parties”) file this Joint Motion for Extension of Time to file their Appraisal Reports<sup>1</sup> in this docket and show as follows:

The Parties are seeking a 60-day extension of time file their respective Appraisal Reports

The Parties are continuing active settlement discussions and have not retained any experts for their appraisal report. Public Commission Staff is unopposed to the extension.

This extension is not sought for purposes of delay but so that justice may be done.

Wherefore, the Parties respectfully request that an extension be granted until November 7, 2022 to comply with Order No. 3.

Respectfully submitted,

**COATS | ROSE**

By: \_\_\_\_\_



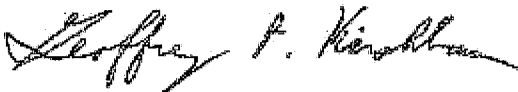
Joshua A. Bethke  
State Bar No. 24105465  
jbethke@coatsrose.com  
14755 Preston Road, Suite 600  
Dallas, Texas 75254

<sup>1</sup> Appraisal Reports are due on or before September 8, 2022 – see Order No. 3 Finding Petition Administratively Complete and Notice Sufficient and Establishing Procedural Schedule – February 9, 2022

(972) 982-8454 Telephone  
(972) 702-0662 Telecopier

Natalie B. Scott  
State Bar No. 24027970  
nscott@coatsrose.com  
Terrace 2  
2700 Via Fortuna, Suite 350  
Austin, Texas 78746  
(512) 469-7987 Telephone  
(512) 469-9408 Telecopier

**ATTORNEY FOR PETITIONER  
THE SANCTUARY TEXAS, LLC**

By:   
\_\_\_\_\_  
Geoffrey P. Kirshbaum  
State Bar No. 24029665  
TERRILL & WALDROP  
810 West 10<sup>th</sup> Street  
Austin, Texas 78701  
(512) 474-9100  
(512) 474-9888 (fax)  
gkirshbaum@terrillwaldrop.com

**ATTORNEY FOR AQUA TEXAS, INC.**

**CERTIFICATE OF CONFERENCE**

I certify that on September 1, 2022, I conferred with Ian Groetsch, Staff attorney for the Public Utility Commission, and he indicated that he is not opposed to the extension.

  
\_\_\_\_\_  
Natalie B. Scott

## **CERTIFICATE OF SERVICE**

I certify that a true and correct copy of this document was served on the following attorneys of record on or before September 6<sup>th</sup>, 2022 in accordance with 16 TEX. ADMIN. CODE §22.74(c).

### **Attorney for PUC:**

Ian Groetsch, Attorney-Legal Division  
Public Utilities Commission of Texas  
1701 N. Congress Avenue  
P.O. Box 13326  
Austin, Texas 78711-3326  
Email: [Ian.Groetsch@puc.texas.gov](mailto:Ian.Groetsch@puc.texas.gov)

A handwritten signature in black ink that reads "Natalie B. Scott". The signature is written in a cursive style with a large, stylized "N" and "S".

---

Natalie B. Scott