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DOCKET NO. 52916

PETITION OF CHARLES D. CARTER	§	PUBLIC UTILITY COMMISSION
TO AMEND MARILEE SPECIAL	§	
UTILITY DISTRICT'S CERTIFICATE	§	
OF CONVENIENCE AND NECESSITY	§	OF TEXAS
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 December 29, 2021, 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 Mr. Carter, and neither are opposed to this request.

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

- 1. The Original Petition in this case was filed on December 3, 2021. The Petition has not yet been ordered to be administratively complete, and a procedural schedule has not yet been established.
- 2. Commission Staff's Discovery Requests, filed on December 29, 2021, were subject to a Rule 11 agreement between the parties, filed January 11, 2022, which extended the deadline for the District to respond to the Discovery Requests until February 24, 2022.
- 3. The District wishes to respond to Commission Staff's Discovery Requests. The District requests a further extension until March 10, 2022, to compile the information needed to fully respond to the Discovery Requests.
- 4. The District does not make this motion to cause delay, but only to create a more Marilee Special Utility District's Unopposed Motion for Extension of Time to Respond to Commission Staff's First Request for Information

accurate and 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.

Respectfully submitted,

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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