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CRYSTAL BLUFF GOAT RANCHES,	§	PUBLIC UTILITY COMMISSION
LLC'S APPEAL OF THE COST OF	§	
OBTAINING SERVICE FROM POSSUM	§	OF TEXAS
KINGDOM WATER SUPPLY CORP.	§	

CRYSTAL BLUFF GOAT RANCHES, LLC'S UNOPPOSED REQUEST FOR GOOD FAITH EXTENSION OF TIME TO FILE RESPONSE TO POSSUM KINGDOM WATER SUPPLY CORP.'S PLEA TO THE JURISDICTION AND MOTION TO DISMISS

COMES NOW, Crystal Bluff Goat Ranches, LLC, ("CBGR"), and files this Request for Extension of Time to File Response to Possum Kingdom Water Supply Corp.'s ("PKWSC") Plea to the Jurisdiction and Motion to Dismiss and would respectfully show the following facts:

- 1. PKWSC filed its Plea to the Jurisdiction, Motion to Dismiss, and Response to Appeal on May 16, 2022. Pursuant to Rule 22.78(a), CBGR's response was due on May 21, 2022.
- 2. Justin Broome of Dorsett Johnson & Swift, LLP, was substituted as handling attorney for CBGR in this matter on May 10, 2022. In addition to immediately inheriting a sizeable caseload, Mr. Broome became ill and tested positive for COVID-19 on May 17, 2022. Mr. Broome's illness as well as his significant new caseload resulted in the failure of CBGR's counsel to correctly calendar the response deadline under Rule 22.78(a). Immediately upon becoming aware of the deadline, CBGR's counsel contacted the Commission to report this error.
- 3. Pursuant to Rule 21.11(b) CBGR respectfully requests that the Commission extend its deadline to file a response to PKWSC's Plea to the Jurisdiction and Motion to Dismiss to Monday, June 20, 2022. CBGR has demonstrated good cause for the requested extension, and the extension will not result in unfair prejudice to PKWSC.

WHEREFORE, PREMISES CONSIDERED, Crystal Bluff Goat Ranches, LLC, respectfully requests that the Commission grant its request to extend the deadline to file its

response to Possum Kingdom Water Supply Corp.'s Plea to the Jurisdiction and Motion to Dismiss to Monday, June 20, 2022.

Respectfully submitted this the 13th day of June, 2022.

Respectfully submitted,

DORSETT JOHNSON & SWIFT, LLP

By: <u>/s/ C. Justin Broome</u>

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ATTORNEYS FOR CRYSTAL BLUFF GOAT RANCHES, LLC

CERTIFICATE OF SERVICE

I certify that on June 13, 2022, a true and correct copy of the foregoing instrument was served on all counsel pursuant to the Texas Rules of Civil Procedure.

<u>/s/ C. Justin Broome</u>

C. Justin Broome