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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 FIRST AMENDED 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 First Amended Unopposed 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 16 TEX. ADMIN. CODE § 22.181(e)(3). CBGR’s response was due on June 8, 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, one day after PKWSC filed its Plea to the Jurisdiction and Motion to Dismiss. 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 22.181(e)(3). Immediately upon becoming aware of the deadline, CBGR’s counsel contacted the Commission to report this error.

3. Pursuant to 16 TEX. ADMIN. CODE § 22.5(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.

4. The Commission Staff has indicated to CBGR that they are not opposed to the requested extension.

5. Undersigned counsel certifies that he conferred with PKWSC's counsel on June 13, 2022, and PKWSC's counsel is unopposed to the requested extension.

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 14th day of June, 2022.

Respectfully submitted,

DORSETT JOHNSON & SWIFT, LLP

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**ATTORNEYS FOR CRYSTAL BLUFF
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CERTIFICATE OF SERVICE

I certify that, unless otherwise ordered by the presiding officer, notice of the filing of this document was provided to all parties of record via e-mail on June 14, 2022, in accordance with the Orders Suspending Rules filed in Project No. 50664.

/s/ C. Justin Broome

C. Justin Broome