

Eric Fryson

From: Roberts, Brenda [ROBERTS.BRENDA@leg.state.fl.us]
Sent: Wednesday, October 24, 2012 1:57 PM
To: Filings@psc.state.fl.us
Cc: Saylor, Erik; Vandiver, Denise; Gene Brown; Lisa Bennett; Martha Barrera; Marty Friedman; Ralph Jaeger
Subject: E-filing (Dkt. No. 110200-WU)
Attachments: 110200 notice of taking depositions duces tecum.doc.pdf
Electronic Filing

a. Person responsible for this electronic filing:

Erik L. Saylor, Associate Public Counsel
Office of Public Counsel
c/o The Florida Legislature
111 West Madison Street, Room 812
Tallahassee, FL 32399-1400
(850) 488-9330
Saylor.erik@leg.state.fl.us

b. Docket No. 110200-WU

In re: Application for increase in water rates in Franklin County by Water Management Services, Inc.

c. Document being filed on behalf of Office of Public Counsel

d. There are a total of 4 pages.

e. The document attached for electronic filing is 110200 notice of taking deposition duces tecum.pdf

Thank you for your attention and cooperation to this request.

Brenda S. Roberts
Office of Public Counsel
Telephone: (850) 488-9330
Fax: (850) 488-4491

DOCUMENT NUMBER-DATE

07252 OCT 24 02

FPSC-COMMISSION CLERK

10/24/2012

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Application for increase in water rates in Franklin County by Water Management Services, Inc.

Docket No. 110200-WU

Filed: October 24, 2012

NOTICE OF TAKING DEPOSITIONS DUCES TECUM

TO: Martin S. Friedman
Sundstrom, Friedman & Fumero, LLP
766 North Sun Drive, Suite 4030
Lake Mary, Florida 32746

NOTICE is hereby given, pursuant to Rule 1.310, Florida Rules of Civil Procedure, that the undersigned or another attorney with the Office of Public Counsel (OPC) will take the depositions of the following individuals at the law offices of Sundstrom, Friedman & Fumero, LLP, 2548 Blairstone Pines Drive, Tallahassee, Florida 32301.

<u>Deponent</u>	<u>Date & Time</u>	<u>Location</u>
Bob Mitchell Controller, WMSI	Tuesday, November 6, 2012 2:00 pm	Sundstrom, Friedman & Fumero, LLP 2548 Blairstone Pines Drive Tallahassee, Florida 32301
Gene D. Brown President, WMSI	Wednesday, November 7, 2012 9:00 am	Sundstrom, Friedman & Fumero, LLP 2548 Blairstone Pines Drive Tallahassee, Florida 32301

The deponents are instructed to have copies of the following documents with them: (1) the Utility's application, MFRs, and supporting work papers; (2) documents responsive to the first and second sets of discovery served by OPC since October 1, 2012 as well work papers and other documents supporting those responses; (3) documents responsive to discovery served by

DOCUMENT NUMBER-DATE

07252 OCT 24 12

FPSC-COMMISSION CLERK

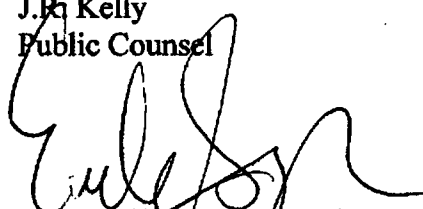
Commission staff since October 1, 2012 as well work papers and other documents supporting those responses; (4) documents responsive to Commission staff's data requests that are relevant to the issues protested by the parties of record; (5) any documents and supporting work papers that support the amounts recorded in and/or credited to Account 123 since January 1, 2005; (6) all documents that support the book value of Brown Management Group such as general ledgers, trial balances and all documents that support payments made by Mr. Brown or Brown Management Group on behalf of WMSI; and (7) any other documents relevant to the issues protested by the parties of record.

Each deposition shall be taken upon oral examination before an official court reporter or other officer authorized by law to take depositions. The deposition is being taken for purposes of discovery, for use at trial, or for any other purposes allowed under the Florida Rules of Civil Procedure and the Rules of the Florida Public Service Commission.

Parties of Record will be provided a dial-in number by separate email.

PLEASE GOVERN YOURSELVES ACCORDINGLY.

J. R. Kelly
Public Counsel



Erik L. Saylor
Associate Public Counsel

Office of Public Counsel
c/o The Florida Legislature
111 West Madison Street, Room 812
Tallahassee, FL 32399-1400
(850) 488-9330

Attorney for the Citizens
of the State of Florida

CERTIFICATE OF OATH

STATE OF _____

COUNTY OF _____

I, the undersigned authority, certify that _____ personally
appeared before me at _____ and was duly sworn by me to tell the
truth.

WITNESS my hand and official seal in the City of _____, County of
_____, State of _____, this _____ day of _____,
20_____.

Notary Public

State of _____

(SEAL)

Personally known _____ OR produced identification _____.

Type of identification produced _____.

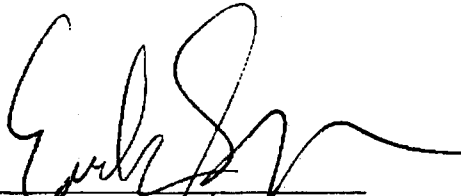
CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing NOTICE OF TAKING DEPOSITIONS DUCES TECUM has been furnished by electronic mail and U.S. Mail to the following parties on this 24th day of October, 2012, to the following:

Martha Barrera
Lisa Bennett
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

Mr. Gene D. Brown
Water Management Services, Inc.
250 John Knox Road, #4
Tallahassee, FL 32303-4234

Martin S. Friedman
Sundstrom, Friedman & Fumero, LLP
766 North Sun Drive, Suite 4030
Lake Mary, FL 32746-2554



Erik L. Sayler
Associate Public Counsel