

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Application for certificate to provide wastewater service in Charlotte County by Environmental Utilities, LLC. | DOCKET NO. 20240032-SU

ENVIRONMENTAL UTILITIES, LLC'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS TO LINDA COTHERMAN (NOS. 1-2)

Pursuant to Rule 28-106.206, Florida Administrative Code, and Rule 1.350, Florida Rules of Civil Procedure, the Environmental Utilities, LLC, by and through its undersigned attorney, hereby serves the following Request for Production of Documents on Linda Cotherman.

Please produce the following documents at the Dean Mead Law Firm, 420 S. Orange Ave., Suite 700, Orlando, Florida 32801, as provided by the Rules of Civil Procedure, and within the time period set out in Order No. PSC-2024-0324-PCO-SU.

DEFINITIONS

As used herein, the word "documents" shall mean the original and any non-identical copies of any writing or record, including but not limited to a book, pamphlet, periodical, letter, memorandum, telegram, report, study, interoffice or intraoffice, handwritten or other notes, working paper, draft, application, permit, chart, paper, graph, survey, index, tape, disc, data sheet or data processing card, computer printout, or any other written, recorded, transcribed, filed or graphic matter, however produced or reproduced.

DOCUMENTS REQUESTED

1. Copies of all inspections of your septic tank in the last 5 years.
2. Photos showing the portion of your property where your septic tank and drain field are located after the two recent hurricanes.

/s/ Martin S. Friedman

Martin S. Friedman, Esquire
Dean, Mead, Egerton, Bloodworth,
Capouano & Bozarth, P.A.
420 S. Orange Ave., Ste. 700
Orlando, Florida 32801
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Fax: (407) 423-1831

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Application for certificate to provide
wastewater service in Charlotte County by
Environmental Utilities, LLC.

DOCKET NO. 20240032-SU

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of ENVIRONMENTAL UTILITIES,
LLC'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS TO LINDA COTHERMAN
(NOS. 1-2) has been served by electronic mail to the following this 2nd day of December , 2024:

<p>Brad E. Kelsky, Esq. Kelsky Law, P.A. 150 South Pine Island Road Suite 300 Plantation, Florida 33324 bradkelsky@kelskylaw.com</p> <p>Valerie L. Chartier-Hogancamp Robert C. Volpe, Esq. Kayla Kentnor Holtzman Vogel, PLLC 119 South Monroe Street Suite 500 Tallahassee, Florida 32301 vhogancamp@holtzmanvogel.com rvolpe@holtzmanvogel.com kkentnor@holtzmanvogel.com</p>	<p>Linda Cotherman Post Office Box 881 Placida, Florida 33946 lcotherman@yahoo.com</p> <p>Daniel Dose, Esquire Major Thompson, Esquire Office of General Counsel Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850 ddose@psc.state.fl.us major.thompson@psc.state.fl.us discovery-gcl@psc.state.fl.us</p>
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/s/ Martin S. Friedman

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