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March 19, 1997

VIA HAND DELIVERY

Blanco Bayo, Director
Division of Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0862

Re: Mad Hatter Utility, Inc; Docket No. 960576-WS
Application for Amendment of Water and Wastewater
Certificates in Pasco County, Florida
Our File No. 28023.07

Dear Ms. Bayo:

Enclosed for filing please find the original and fifteen (15) copies of Mad Hatter's Objection To Pasco County's Request For Production in the above-referenced docket.

If you have any questions in this regard, please let me know.

Sincerely,

ROSE, SUNDBSTROM & BENTLEY, LLP

John L. Wharton
John L. Wharton, Esq.
For The Firm

ACK _____
AFA _____
APP _____
CAF _____
CMU _____ JLW/lm
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FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: APPLICATION OF MAD HATTER
UTILITY, INC. FOR AMENDMENT OF
WATER AND WASTEWATER CERTIFICATES
IN PASCO COUNTY, FLORIDA

Docket No. 960576-WS

MAD HATTER'S OBJECTION TO
PASCO COUNTY'S REQUEST FOR PRODUCTION

Mad Hatter Utility, Inc. ("Mad Hatter"), by and through its undersigned counsel, hereby files this Objection To Pasco County's Request For Production, and in support thereof states as follows:

GENERAL OBJECTIONS

1. Mad Hatter objects to any requirement that the documents be produced at the offices of counsel for Pasco County as being violative of the Florida Rules of Civil Procedure.

2. The County's outrageous attempts to be inclusive in its definitions would, if taken literally, reach practically all of the information known to Mad Hatter on every subject and all of the information known to every person known to Mad Hatter on the requested subjects. There can be no better example of this than a definition of "document" which consists of a single sentence of approximately eighty lines.

3. To the extent that any Request For Production seeks information which is privileged, work-product, or afforded similar or analogous protections by Florida law, Mad Hatter objects.

OBJECTIONS TO DEFINITIONS AND INSTRUCTIONS

4. Mad Hatter objects to any portion of the "definitions" which would require production of documents or define documents or

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information to be produced in any manner inconsistent with the Florida Rules of Civil Procedure and the discovery practice and precedence of the Florida Public Service Commission.

5. Mad Hatter objects to the definitions of "you," "your," and "company" as being vague, over-broad, unclear, burdensome and not reasonably calculated to lead to the discovery of admissible evidence.

6. Mad Hatter objects to the definitions of "person" or "persons" as being vague, over-broad, unclear, burdensome and not reasonably calculated to lead to the discovery of admissible evidence.

7. Mad Hatter objects to the defined phrase "identify a person" as being vague, over-broad, burdensome and not reasonably calculated to lead to the discovery of admissible evidence and as being more properly an interrogatory than a request for production.

8. Mad Hatter objects to phrase "identify document" as being vague, over-broad, burdensome and not reasonably calculated to lead to the discovery of admissible evidence. Further, the definition improperly attempts to require Mad Hatter to undertake actions in order to protect any privilege which are beyond those required by the Florida Rules of Civil Procedure and the Commission's rules, and it is therefore objectionable.

9. Mad Hatter objects to phrase "document" as being vague, over-broad, burdensome and not reasonably calculated to lead to the discovery of admissible evidence. To the extent the definition would require the production of documents not required to be

produced under the Florida Rules of Civil Procedure, Mad Hatter objects. The definition, which is perhaps in the form of one of the longest sentences in literary history, is patently unclear and ridiculously over-inclusive.

10. Mad Hatter objects to phrase "evidencing, documenting, or relating to" and "supporting" as being vague, over-broad, burdensome and not reasonably calculated to lead to the discovery of admissible evidence.

11. Mad Hatter objects to the Instructions to the extent that they intend to impose any obligation which exceeds that authorized by the Florida Rules of Civil Procedure including, but not limited to, any attempt to make the requests continuing in nature.

OBJECTIONS

1. The General Objections and the Objections To Definitions And Instructions are hereby incorporated by this reference to the extent applicable. The Request is over-broad, vague, seeks information which is irrelevant, and is not reasonably calculated to lead to the discovery of admissible evidence.

2. The General Objections and the Objections To Definitions And Instructions are hereby incorporated by this reference to the extent applicable.

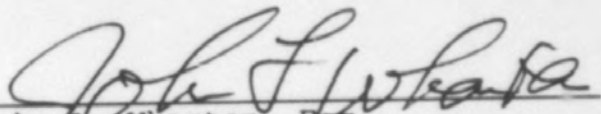
3. The General Objections and the Objections To Definitions And Instructions are hereby incorporated by this reference to the extent applicable. The Request is over-broad, vague, seeks information which is irrelevant, and is not reasonably calculated

to lead to the discovery of admissible evidence. The Request is over-broad, unclear, vague, and not reasonably calculated to lead to the discovery of admissible evidence.

4. The General Objections and the Objections To Definitions And Instructions are hereby incorporated by this reference to the extent applicable. To the extent the Request seeks documents which are public documents, the information is as readily available to Pasco County as to Mad Hatter.

5. The General Objections and the Objections To Definitions And Instructions are hereby incorporated by this reference to the extent applicable. The Request is over-broad, vague, seeks information which is irrelevant, and is not reasonably calculated to lead to the discovery of admissible evidence.

DATED this 19th day of March, 1997.

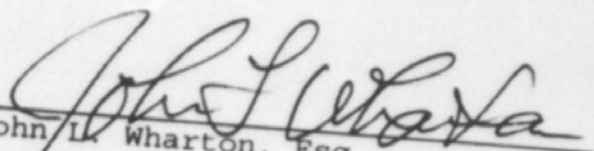

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and accurate copy of the foregoing has been furnished by regular U.S. Mail to the following individuals on this 19th day of March, 1997.

Marion Hale, Esq.
Johnson, Blakely, Pope, et al.
Post Office Box 1368
Clearwater, FL 34617

Roseanne Capeless, Esq.
Division of Legal Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399


John L. Wharton, Esq.

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