

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: Application of)
NORTH FORT MYERS UTILITY, INC.) Docket No. 981781-SU
for extension of wastewater)
service in Lee County, Florida)

OBJECTIONS TO CITIZENS' FIRST REQUEST FOR PRODUCTION
OF DOCUMENTS TO SNOWBIRDLAND VISTAS, INC. AND
MHC-DEANZA FINANCING LIMITED PARTNERSHIP

COME NOW, SNOWBIRDLAND VISTAS, INC. and MHC-DEANZA FINANCING
LIMITED PARTNERSHIP (hereinafter individually and collectively referred to as "MHC") and
respond to Citizens' First Request for Production of Documents (hereinafter referred to as the
"Request for Production") pursuant to Subpoena Duces Tecum Without Deposition issued on
May 21, 1999 and served on or about May 24, 1999 (hereinafter the "Subpoena Duces Tecum")
as follows:

I. GENERAL OBJECTIONS

A. MHC objects to the "Instructions" and "Definitions" set forth in the Request for
Production to the extent they modify, enlarge, abridge or otherwise are inapposite with
applicable provisions of Florida Rules of Civil Procedure, Florida Statutes and Florida
Administrative Code.

B. MHC objects to the definition of "Document" or "Documents" set forth in the

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Request for Production on grounds that the descriptions are overly broad, vague, unduly
burdensome and/or seeks discovery of: (i) confidential/proprietary information; (ii) information
to which a claim of privilege exists, in whole or in part; and/or (iii) matters with respect to which
there has not yet been the requisite showing of need or entitlement.

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C. MHC objects to the Subpoena Duces Tecum and the Request for Production to the extent they seek to require production in a county different than the county wherein: (i) the residence of the custodian or other person in possession of the documents is located; (ii) where the documents or things are located; and/or (iii) Where the custodian or person in possession usually conducts business.

II. SPECIFIC RESPONSES

Without waiving the foregoing General Objections, and specifically reserving same, MHC herein provides specific responses to the Request for Production through the following correspondingly enumerated paragraphs:

Request No. 1: To the extent within the custody and control of MHC, such will be furnished upon the payment of reasonable costs of preparing the subject copies.

Request No. 2: To the extent within the custody and control of MHC, such will be furnished upon the payment of reasonable costs of preparing the subject copies.

Request No. 3: To the extent within the custody and control of MHC, such will be furnished upon the payment of reasonable costs of preparing the subject copies.

Request No. 4: MHC objects to the production of such documents on grounds it seeks discovery of matters which, to the extent in existence, if at all, constitute confidential and/or proprietary information for which a Request for Confidential Classification and/or Motion for Protective Order is contemporaneously served herewith. Moreover, MHC further objects to discovery sought under this Request on grounds it is irrelevant, and/or not reasonably calculated to lead to the discovery of admissible evidence.

Request No. 5: To the extent such are within the custody and control of MHC, such will be furnished upon the payment of reasonable costs of preparing the corresponding copies.

Request No. 6: MHC objects to discovery sought under this Request on grounds it is irrelevant, and/or not reasonably calculated to lead to the discovery of admissible evidence.

Request No. 7: MHC objects to discovery sought under this Request on grounds it is irrelevant, and/or not reasonably calculated to lead to the discovery of admissible evidence.

Request No. 8: To the extent such are within the custody and control of MHC, such will be furnished upon the payment of reasonable costs of preparing the corresponding copies.

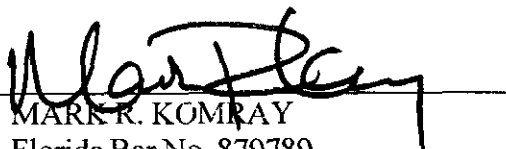
Request No. 9: To the extent such are within the custody and control of MHC, such will be furnished upon the payment of reasonable costs of preparing the corresponding copies.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and accurate copy of the foregoing has been served to Stephen C. Reilly, Associate Public Counsel, Office of Public Counsel, c/o The Florida Legislature, 111 W. Madison Street, Room 812, Tallahassee, Florida, 32399-1400 via facsimile (850/488-4491) and regular U.S. mail this 22nd day of June, 1999.

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