

ORIGINAL

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: Application for staff-)
assisted rate case in Highlands)
County by **The Woodlands of Lake**)
Placid, L.P.)

DOCKET NO. 020010-WS

020010-WS

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COMMISSION CLERK

HIGHVEST CORPORATION AND L.P. UTILITIES
CORPORATION'S OBJECTION TO COMMISSION
STAFF'S FIRST REQUEST FOR PRODUCTION
OF DOCUMENTS(3 and 4)

Highvest Corporation and L.P. Utilities Corporation, by and through their undersigned attorney, hereby object to Commission Staff's First Request for Production of Document (numbers 3 and 4):

- 3. Please provide copies of all Articles of Incorporation and Corporate Resolutions for the following companies: Highvest Corporation; Camper Corral, Inc.; Camp Florida Resort; Camper Corral of Highlands County, Inc.; Camp Florida Property Owners Association, Inc.; Seavest Corporation; The Woodlands of Lake Placid, LP; and L.P. Utilities Corporation.
- 4. Please provide copies of all mortgage, secured debt, and foreclosure documents for any of the following companies: Highvest Corporation; Camper Corral, Inc.; Camp Florida Resort; Camper Corral of Highlands County, Inc.; Camp Florida Property Owners Association, Inc.; Seavest Corporation; The Woodlands of Lake Placid, LP; and L.P. Utilities Corporation.

The Request seeks documents of Camp Florida Resort, Camper

AUS	_____	Coral of Highlands County, Inc., Camp Florida Property Owners
CAF	_____	
CMP	_____	
COM	<u>3</u>	Association, Inc., and Seavest Corporation, none of which have
CTR	_____	
ECR	_____	
GCL	_____	anything to do with providing water and wastewater service that is
OPC	_____	
MMS	_____	
SEC	<u>1</u>	
OTH	_____	

DOCUMENT NUMBER-DATE

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FPSC-BUREAU OF RECORDS

FPSC-COMMISSION CLERK

the subject of this proceeding. These are apparently corporations that the Staff's search of the corporate records show Mr. Lovelette or Mr. Cozier as officers. As such, this is little more than a fishing expedition. The documents requested are irrelevant and immaterial to this proceeding and not calculated to lead to the discovery of admissible evidence. *City of Miami v. Florida Public Service Commission*, 226 So.2d 217 (Fla. 1969).

Respectfully submitted this 18th
day of February, 2003, by:

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MARTIN S. FRIEDMAN
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For the Firm

CERTIFICATE OF SERVICE

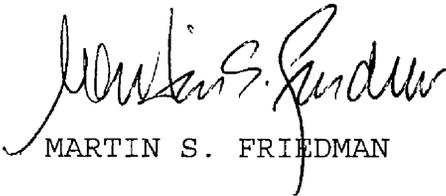
I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by U.S. Mail this 18th day of February, 2003, to:

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