

BEFORE THE PUBLIC SERVICE COMMISSION

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In re: Application for transfer of majority organizational control of Holiday Utility Company, Inc. in Pasco County to Holiday Waterworks Corporation and amendment of Certificate No. 224-W

OTH

DOCKET NO. 030458-WU MAY 22 AM 9: 42 ORDER NO. PSC-06-0198-PCO-WU ISSUED: MARCH 13, 2006 CUMMISSION CLERK

FIRST REQUEST FOR PRODUCTION OF DOCUMENTS TO HOLIDAY UTILITY COMPANY, INC.

PASCO COUNTY, a political subdivision of the State of Florida, by and through its undersigned attorney, hereby requests that Holiday Utility Company, Inc. produce all of the following items within thirty (30) days after service of this Request at the office of the undersigned attorney:

DEFINITIONS

As used throughout this First Request for Production (these "Requests"), the following terms will have the following corresponding meanings:

1. The terms "Holiday Utility Company, Inc." and "You" will mean Holiday Utility Company, Inc., and will include your present or former officers, directors, owners, employees and agents when referring to actions taken by you.

3. The term "document" refers to and will include, without limitation and in the

2. The term "your" will mean pertaining or belonging to you.

	singular as well as in the plural, any handwritten, sketched, painted, drawn, traced, illustrated, typed, printed, recorded, graphical, electronic, digital,
CMP	analog, optical, and/or other depiction, delineation, portrayal, reflection, projection, description, reproduction, representation or presentation of
COM	information of any kind whatsoever, however created, depicted or stored
CTR	(e.g., on computer, disk, diskette, CD, CDROM, DVD, tape, Zip [®] , Jaz [®] , hard, network or other drive; and/or by photographic, mechanical, digital, optical,
ECR	electronic, or any other means), of any type or description, including all drafts,
GCI	originals, identical and non-identical copies (in whole or in part), and includes, without limitation: all memoranda, letters, postcards, facsimile messages,
OPC	telex messages, telegrams, intra-office and interoffice communications,
RCA	electronic mail, correspondence, notes, pamphlets, diaries, records of every kind, tapes and other sound recordings, transcripts, contracts, agreements,
SCR	books, reports, catalogs, financial statements, books of account, journals,
SGA	ledgers, data processing cards, other data processing materials, data sheets,
SEC	photographs, photostats, microfilm, videotapes, maps, directives, bulletins, MBER-DATE

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circulars, notices, messages, tabulations, economic or statistical studies, surveys, statements, summaries, opinions, analyses, evaluations, diaries, lists, polls, transcripts, minutes, agendas, instructions, requests, cancelled checks, calendars, desk pads, appointment books, scrapbooks, notebooks, specifications, drawings, diagrams, sketches and writings, documents, and evidences of other Communications of every kind and character. This request includes any meta-data related to a Document.

4. All other words not specifically defined herein will have the meaning given to them in the Pasco County Land Development Code, Pasco County Code of Ordinances, or if not defined therein, such meaning as common usage would prescribe.

REQUESTS

- 1. Please provide documentation showing the parcel identification number, owner name and address of all property owned by the Bartley L. Mickler Estate ("Mickler Estate") or any entities owned or controlled by the Mickler Estate or the family of Bartley L. Mickler located within the requested service territory.
- Please provide documentation including but not limited to correspondence with the Southwest Florida Water Management District, the City of Tarpon Springs or other entities, relating to your efforts to plan for or secure additional sources or supplies of water needed to serve the requested service territory or your current service area.

Certificate of Service

I HEREBY CERTIFY that a true and correct copy of the foregoing Notice of Service of Interrogatories was served via regular U.S. Mail upon Holiday Utility Company, Inc., c/o Brian Armstrong, Esquire, Nabors, Giblin & Nickerson, The Pointe, Suite 1060, 2502 Rocky Point Drive, Tampa, FL 33607 this 19 day of May, 2006.

Joseph D. Richards

Assistant County Attorney Florida Bar No.: 0777404

Office of the County Attorney

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Attorney for Pasco County, Florida