

**Diamond Williams**

100085-WU

**From:** Trina Collins [TCollins@RSBattorneys.com]  
**Sent:** Friday, January 21, 2011 3:39 PM  
**To:** Filings@psc.state.fl.us  
**Cc:** marsha@reuplaw.com; Erik Saylor; Lazaan@aol.com; Martin Friedman; Christian W. Marcelli; Trina Collins  
**Subject:** Filing in Docket No. 100085-WU; Black Bear Reserve Water Company, Inc.'s Application for certificate to operate water utility in Lake County, Florida

**Importance:** High

**Attachments:** PSC Clerk 01 (Filing Discovery Requests to Black Bear Reserve Water Company).ltr.pdf

- a. Martin S. Friedman, Esq.  
 Christian W. Marcelli, Esq.  
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[cmarcelli@rsbattorneys.com](mailto:cmarcelli@rsbattorneys.com)
- b. Docket No. 100085-WU; Black Bear Reserve Water Company, Inc.'s Application for certificate to operate water utility in Lake County, Florida - Filing discovery requests from Upson Downs Limited Partnership to Black Bear Reserve Water Company a/k/a Black Bear Reserve Water Corporation.
- c. Black Bear Reserve Water Company, Inc.
- d. 19 Pages.
- e. Letter to Commission Clerk - 1 page; Notice of Service of First Set of Interrogatories - 2 pages; First Set of Interrogatories - 5 pages; First Request for Production of Documents - 9 pages; and First Request for Admissions - 2 pages.

Discovery  
Forwarded to  
GCL at Mcfean

DOCUMENT NUMBER-DATE

00495 JAN 21 =

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1/21/2011

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Please Respond to the Lake Mary Office

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January 21, 2011

E-FILING

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STEVEN T. MINDLIN, P.A.  
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DIANE D. TREMOR, P.A.  
JOHN L. WHARTON

ROBERT M.C. ROSE, (1924-2006)

Ann Cole, Commission Clerk  
Office of Commission Clerk  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399

Re: Docket No. 100085-WU; Black Bear Reserve Water Company, Inc.  
Application for certificate to operate water utility in Lake County, Florida  
Our File No.: 38052.08

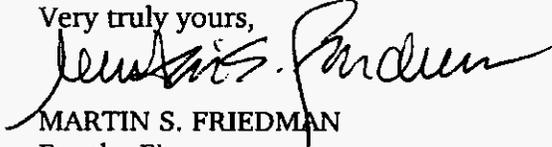
Dear Ms. Cole:

Enclosed for filing in the above-referenced docket are the following discovery requests from Upson Downs Limited Partnership to Black Bear Reserve Water Company, Inc. a/k/a/ Black Bear Reserve Water Corporation:

- Notice of Service of First Set of Interrogatories
- First Set of Interrogatories
- First Request for Production of Documents
- First Request for Admissions

Should you or members of the Staff have any questions regarding this filing, please do not hesitate to give me a call.

Very truly yours,

  
MARTIN S. FRIEDMAN  
For the Firm

MSF/tlc  
Enclosures

cc: Marsha E. Rule, Esquire (w/enclosures) (via e-mail and U.S. Mail)  
Erik L. Saylor, Esquire, Senior Attorney, Office of the General Counsel (w/enclosures)  
(via e-mail and U.S. Mail)  
Mrs. Lee Ann Carson (w/enclosures) (via e-mail)

DOCUMENT NUMBER - DATE  
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M:\1 ALTAMONTE\CARSON (Black Bear Reserve)\(.08) Protest of PSC Application\PSC Clerk 01 (Filing Discovery Requests to Black Bear Reserve Water Company).ltr.doc

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2548 BLAIRSTONE PINES DRIVE, TALLAHASSEE, FLORIDA 32301 (850) 877-6555 FAX (850) 656-4029  
950 PENINSULA CORPORATE CIRCLE, SUITE 2020, BOCA RATON, FLORIDA 33487 (561) 982-7114 FAX (561) 982-7116

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Application for Certificate to operate  
Water Utility in Lake County, Florida by  
Black Bear Reserve Water Company, Inc.

DOCKET NO. 100085-WU

NOTICE OF SERVICE OF UPSON DOWNS LIMITED PARTNERSHIP'S  
FIRST SET OF INTERROGATORIES TO  
BLACK BEAR RESERVE WATER COMPANY, INC.

UPSON DOWNS LIMITED PARTNERSHIP ("Upson Downs"), by and through its undersigned attorneys and pursuant to the Florida Rules of Civil Procedure, hereby gives notice of serving its First Set of Interrogatories, numbered 1 through 8, upon BLACK BEAR RESERVE WATER COMPANY, INC. ("Black Bear").

Respectfully submitted this 21<sup>st</sup> day of  
January, 2011, by:

ROSE, SUNDSTROM & BENTLEY, LLP  
766 N. Sun Drive  
Suite 4030  
Lake Mary, Florida 32746  
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MARTIN S. FRIEDMAN  
Florida Bar No.: 0199060  
For the Firm  
*Attorneys for Upson Downs*

**CERTIFICATE OF SERVICE**  
**DOCKET NO. 100085-WU**

I HEREBY CERTIFY that a true and correct copy of the foregoing First Set of Interrogatories has been furnished by e-filing and U. S. Mail to the following parties this 21<sup>st</sup> day of January, 2011:

Marsha E. Rule, Esquire  
RUTLEDGE, ECENIA & PURNELL, P.A.  
P.O. Box 551  
Tallahassee, Florida 32302  
*Attorneys for Black Bear Reserve Water Company, Inc.*

Eric L. Sayler, Esquire  
Senior Attorney, Office of the General Counsel  
FLORIDA PUBLIC SERVICE COMMISSION  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850  
*Attorneys for Florida Public Service Commission*



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*Attorneys for Upson Downs*