

**Eric Fryson**

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**From:** Dana Rudolf [drudolf@sflaw.com]  
**Sent:** Friday, April 13, 2012 3:04 PM  
**To:** Filings@psc.state.fl.us  
**Cc:** Martin Friedman  
**Subject:** Docket No. 110200-WU; Application for increase in water rates in Franklin County by Water Management Services, Inc.

**Attachments:** Objection to Citizens' 1st Interrogatories.pdf

- a) Martin S. Friedman, Esquire  
Sundstrom, Friedman & Fumero, LLP  
766 North Sun Drive, Suite 4030  
Lake Mary, FL 32746  
(407) 830-6331  
[mfriedman@sflaw.com](mailto:mfriedman@sflaw.com)
- b) Docket No. 110200-WU  
Application for increase in water rates in Franklin County by Water Management Services, Inc.
- c) Water Management Services, Inc.
- d) 3 pages
- e) Objection to Citizens' First Set of Interrogatories.

DOCUMENT NUMBER - DATE

02274 APR 13 2012

FPSC-COMMISSION CLERK

4/13/2012

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

Application for Increase in Water Rates in  
Franklin County by Water Management  
Services, Inc.

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Docket No.: 110200-WU

Filed: April 13, 2012

WATER MANAGEMENT SERVICES, INC.'S  
OBJECTION TO CITIZENS' FIRST SET OF INTERROGATORIES

Water Management Services, Inc. ("WMSI"), by and through its undersigned attorneys,  
files this Objection to Citizens' First Set of Interrogatories and states:

1. OPC served its First Set of Interrogatories on WMSI pursuant to Fla. R. Civ. P. 1.340.
2. Pursuant to Fla. R. Civ. P. 1.340, "interrogatories shall not exceed 30, including all subparts."
3. There are 91 interrogatories and subparts in OPC's Interrogatories.
4. WMSI should not be compelled to guess at which 25 interrogatories to respond to, but OPC should be compelled to identify the 25 interrogatories and subparts to which it requests responses.

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FPSC-COMMISSION CLERK

WHEREFORE, Water Management Services, Inc. requests this Commission issue and Order requiring OPC to identify the 25 interrogatories, including subparts, to which it seeks responses.

Respectfully submitted this 13<sup>th</sup> day of April, 2012, by:

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MARTIN S. FRIEDMAN  
Florida Bar No.: 0199060  
For the Firm


CERTIFICATE OF SERVICE  
(Docket No. 110200-WU)

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished

by U. S. Mail this 13th day of April, 2012, to:

Erik L. Saylor, Esquire  
Associate Public Counsel  
Office of Public Counsel  
c/o The Florida Legislature  
111 W. Madison Street, Room 812  
Tallahassee, FL 32399-1400

Ralph Jaeger, General Counsel  
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