

**SOAH DOCKET NO. 582-24-22552
TCEQ DOCKET NO. 2023-1591-MWD**

APPLICATION OF CORIX UTILITIES (TEXAS) INC. FOR TPDES PERMIT NO. WQ0013977001	§ § § § §	BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS
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PROTESTANT’S INITIAL RULE 194 DISCLOSURES

Pursuant to Rule 194 of the Texas Rules of Civil Procedure, Title 1, Chapter 155 of the Texas Administrative Code, Protestant Environmental Stewardship (“ES” or “Protestant”) provides the following Initial Rule 194 Disclosures. Protestant reserves the right to supplement these disclosures in accordance with Texas Rule of Civil Procedure 193.5, and pursuant to any order of the court or agreed scheduling order.

Sincerely,

/s/ Eric Allmon
Eric Allmon
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PERALES, ALLMON & ICE, P.C.
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Counsel for Environmental Stewardship

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document has been served on all persons listed below, in compliance with the Texas Rules of Civil Procedure, on October 17, 2024.

/s/ Eric Allmon
Eric Allmon

**For the Applicant Corix Utilities (Texas)
Inc.**

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For the Executive Director

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For the Office of Public Interest Counsel

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RULE 194.2(b) INITIAL DISCLOSURES

(1) the correct names of the parties to the lawsuit;

Response: The correct names of the parties are stated in the Order Memorializing Preliminary Hearing, Adopting Procedural Schedule, and Scheduling Hearing on the Merits, signed by Administrative Law Judge Rebecca Smith on October 15, 2024.

(2) the name, address, and telephone number of any potential parties;

Response: Protestant is unaware of any potential parties that have not been named as parties to this action.

(3) the legal theories and, in general, the factual bases of the responding party's claims or defenses;

Response: Protestant's legal theories, and general factual basis for those theories, are set forth in the comments previously filed with regard to the permit application.

(4) the amount and any method of calculating economic damages;

Response: No damages are sought.

(5) the name, address, and telephone number of persons having knowledge of relevant facts, and a brief statement of each identified person's connection with the case;

Response:

a. Steve Box

P.O. Box 1423

Bastrop, TX 78602

512-300-6609

Mr. Box can be reached through counsel for Environmental Stewardship.

Mr. Box is the Executive Director and Board President of Environmental Stewardship.

b. Richard Martin

703 Austin Street

Bastrop, TX 78602

Mr. Martin can be reached through counsel for Environmental Stewardship.

Mr. Martin is a member of Environmental Stewardship who has fished in the area of the Colorado River from Webberville to Bastrop for more than 50 years.

(6) a copy—or a description by category and location—of all documents, electronically stored information, and tangible things that the responding party has in its possession, custody, or control, and may use to support its claims or defenses, unless the use would be solely for impeachment;

Response: Responsive documents can be found at the following Dropbox link:

https://www.dropbox.com/scl/fo/vm5ag6bezckzf49txnwxy/AAW1XGvhIij_gKCNbehJaIM?rlkey=6i2kb6mjyc38krxtrzg2pfnix&st=7jfggi8a&dl=0

(7) any indemnity and insuring agreements described in 192.3(f);

Response: None known at this time.

(8) any settlement agreements described in Rule 192.3(g);

Response: None known at this time.

(9) any witness statements described in Rule 192.3(h);

Response: None known at this time.

(10) in a suit alleging physical or mental injury and damages from the occurrence that is the subject of the case, all medical records and bills that are reasonably related to the injuries or damages asserted or, in lieu thereof, an authorization permitting the disclosure of such medical records and bills.

Response: Not applicable.

(11) in a suit alleging physical or mental injury and damages from the occurrence that is the subject of the case, all medical records and bills obtained by the responding party by virtue of an authorization furnished by the requesting party.

Response: Not applicable.

(12) the name, address and telephone number of any person who may be designated as a responsible third party.

Response: None known at this time.