



ORIGINAL

December 29, 1998

by Federal Express

Ms. Blanca Bayo  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850

Re: Docket No. 970657-WS; Application for certificates to operate a water and wastewater utility in Charlotte and DeSoto Counties by Lake Suzy Utilities, Inc.

Docket No. 980261-WS; Application for Amendment of Certificate Nos. 570-W and 496-S in Charlotte County by Florida Water Services Corporation.

Dear Ms. Bayo:

Enclosed for filing in the above-referenced consolidated dockets, please find an original and fifteen copies of an Amended Notice of Taking Deposition Duces Tecum for Charlotte Sopko. Please acknowledge filing of these items by date stamping the enclosed extra copy of this letter and returning it in the postage paid envelope provided.

If you have any questions, please contact me at (407) 880-0058, ext. 260.

Sincerely yours,

Matthew J. Feil  
Staff Attorney

Enclosures

- ACK \_\_\_\_\_
- AFA \_\_\_\_\_
- APP \_\_\_\_\_
- CAF \_\_\_\_\_
- CMU \_\_\_\_\_
- CTR \_\_\_\_\_
- EAG \_\_\_\_\_
- LEG \_\_\_\_\_
- LIN \_\_\_\_\_
- OPC \_\_\_\_\_
- RCH \_\_\_\_\_
- SEC \_\_\_\_\_
- WAS \_\_\_\_\_
- OTH \_\_\_\_\_

DOCUMENT NUMBER-DATE

14681 DEC 30 98

98 DEC 30 11 12 36

Florida Water Services Corporation / P.O. Box 609520 / Orlando, Florida 32860-9520 / Phone 407/880-0058

Water For Florida's Future

REGISTRATION/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In. Re: Application for )  
and certificates to operate a )  
water and wastewater utility )  
in Charlotte and DeSoto Counties )  
by Lake Suzy Utilities, Inc. )  
\_\_\_\_\_ )

Docket No. 970657-WS

and

In Re: Application for )  
Amendment of Certificate Nos. )  
570-W and 496-S in Charlotte )  
County by Florida Water Services )  
Corporation. )  
\_\_\_\_\_ )

Docket No. 980261-WS

AMENDED NOTICE OF TAKING DEPOSITION DUCES TECUM

**TO: CHARLOTTE SOPKO**  
**Haus Development, Inc.**  
**603 East Wood Avenue**  
**Mt. Prospect, Illinois 60056**

PLEASE TAKE NOTICE that on **December 31, 1999** at the hour of **11 a.m. EASTERN STANDARD TIME**, at 603 East Wood Avenue, Mt. Prospect, Illinois 60056, before a Court Reporter, a Notary Public, or some person authorized by law, Florida Water Services Corporation, by and through its undersigned attorneys, will take the telephonic deposition of **CHARLOTTE SOPKO**, in accordance with Fla. R. Civ. P. 1.310 (b) (6). The oral examination will continue from day to day pursuant to adjournments, if any, until completed.

Since this deposition will be taken by telephone, the deponent shall provide items listed on Exhibit A, attached hereto and incorporated herein, to counsel for Florida Water by U.S. mail or other parcel delivery, prior to taking the deposition. Please provide all documents to the following address:

Mr. Steve Menton, Esquire  
Rutledge, Ecenia et al  
215 First Florida Bank Bldg.  
Tallahassee, Florida 32301  
(850) 681-6788  
(850) 681-6515 (fax)

DOCUMENT NUMBER-DATE


14681 DEC 30 99

FPSC-RECORDS/REPORTING

The deposition is being taken for the purpose of the perpetuation of testimony, discovery, use at trial, or such other uses allowed by law. Definitions and Instructions for this Notice are attached hereto and incorporated herein as Exhibit B.

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing was furnished via FACSIMILE AND Federal Express to Marty Friedman, Rose, Sundstrom & Bentley, 2548 Blairstone Pines Drive, Tallahassee, Florida 32301; John Marks, Knowles, Marks & Randolph, 215 South Monroe Street, Tallahassee, Florida 32301; Bobbie Reyes, Florida Public Service Commission, Legal Division, 2540 Shumard Oak Boulevard, Tallahassee, Florida 32399-0850; Abel, Band, Russell, Collier, Pitchford & Gorden, 240 S. Pineapple Avenue, Sarasota, Florida 34230; and Via FACSIMILE AND U.S. Mail to Charlotte L. Sopha, Haus Development, Inc., Post Office Box 3024, Port Charlotte, Florida 33949 on this 29<sup>th</sup> Day of December, 1998.



CARLYN H. KOWALSKY

Florida Bar Number: 0558672

Florida Water Services Corporation

1000 Color Place

Apopka, Florida 32703

407/880-0058

Facsimile: 407/880-1395

**EXHIBIT "A"**  
**DOCUMENTS TO BE PRODUCED**

**Information Request**

1. Any and all documents prepared by real estate professionals (i.e. brokers, appraisers, relators) received by Haus Development, Inc. since 1994 and which relates to the Links Subdivision.
2. Any and all listing agreements for the Haus Development, Inc. property in the Links Subdivision.
3. Any and all closing documents from Haus Development, Inc.'s acquisition of its Links Subdivision holdings.
4. Any and all internally generated Haus Development documents created since 1994 which address utility services to the Links Subdivision.

**EXHIBIT "B"**  
**Definitions and Instructions**

When relevant or when used in the following schedule, refer to the following definitions or instructions:

"Document" means any written or graphic matter or other means of preserving thought or expression, and all tangible things from which information can be processed or transcribed, including the originals and all non-identical copies, whether different from the original by reason of any notation made on such copy or otherwise, including, but not limited to, correspondence, memoranda, notes, messages, or other communications, inter-office and intra-office telephone calls, diaries, chronological data, minutes, books, reports, computer print-outs, prospectuses, financial statements, schedules, affidavits, contracts, canceled checks, transcripts, statistics, surveys, magazine or newspaper articles, releases (any and all drafts, alterations and modifications, changes and amendments of any of the foregoing), graphs and aural records or representations of any kind, including without limitations, photographs, charts, graphs, microfiche, microfilm, videotape, recordings, motion pictures and electronic mechanical or electric recordings or representations of any kind (including, without limitations, tapes, cassettes, discs and recordings), and including the file and file cover.

The term "all documents" means every document or group of documents for communication as above defined known to you and every such document or communication, which can be located or discovered by reasonably diligent efforts.

The term "you" and "your" means the party to whom these document requests are addressed, including the party's employees and agents and all other persons acting or purporting to act on the party's behalf.

As used herein, the singular and masculine forms of noun and pronouns shall embrace, and be read and applied as, the plural or feminine or neuter, as circumstances may make appropriate.

Any document as to which a claim of privilege is or will be asserted should be identified by author, signatory, description (e.g., letter, memorandum, telex, recording, etc.), title (if any), date, addresses (if any), general subject matter, present location and custodian and a complete statement of the ground for the claim of privilege should be set forth.

If you assert that any document which is requested has been destroyed, set forth the contents of the document, the date of such destruction and the name of the person who authorized or directed such destruction.

If any of the documents cannot be produced in full, produce to the extent possible, and specify the reason for your inability to produce the remainder.

As used herein, "work" refers to work performed, maintenance performed and materials supplied for use therewith.