

**BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI**

**ANCHOR’S POINT CONDOMINIUM )  
OWNERS ASSOCIATION, INC., )**

**Complainant, )**

**v. )**

**File No. WC-2020-0048**

**TRR MANAGEMENT, LLC; )  
FRANK J. STEED, JR., d/b/a )  
STEED COMMUNITIES; )  
JM LAND HOLDINGS, LLC; TRR )  
TIME SHARE, LLC; CARROLL )  
JAMES CHRISTIANSEN; )  
KIMBERLING INN, INC.; and )  
KIMBERLING PROPERTIES, INC. )**

**Respondents. )**

**NOTICE TO TAKE DEPOSITION OF JERRY HARMAN**

**NOTICE IS HEREBY GIVEN** that beginning at 1:00 p.m., on Monday, October 5, 2020, at the offices of Husch Blackwell LLP, 901 East St. Louis Street, Suite 1800, Springfield, Missouri, Complainant, by and through its attorney will take the deposition, upon oral examination, of Jerry Harman.

**TAKE FURTHER NOTICE** that a *Public Service Commission Subpoena* is being served upon deponent requiring Jerry Harman’s attendance at the time and place referenced herein and for the production of documents more specifically identified on “**Exhibit A,**” attached hereto.

If the deposition is not completed before 5:00 p.m. on the date specified herein, it shall be continued from day to day thereafter at the same place and between the same hours until completed.

The deposition will be reported by stenographic means by For the Record, 2042 South Brentwood Boulevard, Springfield, Missouri.

**HUSCH BLACKWELL LLP**

/s/ J. Michael Bridges  
J. Michael Bridges, MBN 41549  
Laura C. Robinson, MBN 67733  
901 St. Louis Street, Suite 1800  
Springfield, MO 65806  
(417) 268-4000  
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[laura.robinson@huschblackwell.com](mailto:laura.robinson@huschblackwell.com)

**CERTIFICATE OF SERVICE**

This is to certify that on September 11<sup>th</sup>, 2020, a true and correct copy of the above and foregoing was filed and served electronically by the Public Service Commission to all parties receiving electronic notice:

/s/ J. Michael Bridges



State of Missouri  
Public Service Commission

**SUBPOENA**

(order to appear and testify at hearing or deposition, or bring documents, or both)

(Style of Action) Anchor's Point Condominium Owners Association, Inc., Complainant v. TRR Management, LLC; Frank J. Steed, Jr., d/b/a Steed Communities; JM Land Holdings, LLC; TRR Time Share, LLC; Carrol James Christiansen; Kimberling Inn, Inc.; and Kimberling Properties, Inc., Respondents.		(File No.) WC-2020-0048	
<b>State of Missouri to:</b> Jerry Harman, City Administrator, Kimberling City, Missouri			
Person to Be Served	(Name) Jerry Harman	(Address) 34 Kimberling Boulevard Kimberling City, MO 65686	
Requesting Party	(Name) Anchor's Point Condominium Owners Association, Inc.	(Address) 11863 State Highway 13, Kimberling City, MO 65686	
Requesting Party's Attorney	(Name) J. Michael Bridges Husch Blackwell LLP	(Address) 901 St. Louis, St. 1800 Springfield, MO 65806	(Phone) 417-268-4000
<b>You are hereby commanded to:</b>			
<input checked="" type="checkbox"/> Appear at	(Address) Husch Blackwell LLP 901 St. Louis, St. 1800, Springfield, MO 65806	(Date) 10/05/2020	(Time) 1:00 PM
<input type="checkbox"/> Contact	(Name)	, at (Telephone)	, who will advise of the time and place to appear.
<input type="checkbox"/> Testify on behalf of	(Name)	(Address)	
<input checked="" type="checkbox"/> Give depositions.			
<input checked="" type="checkbox"/> Bring the following.	(Documents; attach extra page if needed) See attached Exhibit 1		
 Secretary, Commissioner, or Regulatory Law Judge			

**Return**

(must be signed in the presence of a notary unless served by a peace officer)

On the \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_,

I served the person to be served with a copy of this subpoena at their address, as listed above, by:

- Delivering to that person; or
- Leaving at the dwelling place or usual place of abode with a member of that person's family over the age of 15 years; or
- Mailing by first class mail in a sealed envelope, postage prepaid; or
- The following other method allowed by law:

Non est.

\_\_\_\_\_  
Process Server's Signature

\_\_\_\_\_  
Process Server's Printed Name

**Notarization**

(required unless served by a peace officer)

Subscribed and sworn before me on this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_,

\_\_\_\_\_  
Notary's Signature

[NOTARY SEAL]

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                  **Complainant,** )**

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TIME SHARE, LLC; CARROLL )  
JAMES CHRISTIANSEN; )  
KIMBERLING INN, INC.; and )  
KIMBERLING PROPERTIES, INC. )  
 )  
                  **Respondents.** )**

**EXHIBIT “1” TO SUBPOENA TO JERRY HARMAN**

**A. Directions/Definitions.**

1. “You” or “your” shall mean Jerry Harman;
2. “APCOA” or “Complainant” shall mean the named Complainant Anchor’s Point Condominium Owners Association, Inc. and its officers, directors, employees, partners, corporate parent, subsidiaries or affiliates;
3. “Unit Owners” shall mean the unit owners at Anchor’s Point;
4. Frank J. Steed, Jr. is referred to as “Steed”;
5. Carroll James Christiansen is referred to as “Christiansen”;
6. TRR Management, LLC, Steed Communities, JM Land Holdings, LLC, and TRR Time Share, LLC are referred to as the “Steed Respondents”;
7. Kimberling Inn, Inc. and Kimberling Properties, Inc. are referred to as the “Christiansen Respondents”;
8. Ozarks Clean Water Company is referred to as “OCWC”;
9. File No. WC-2020-0048, Anchor’s Point Condominium Owners Association, Inc. vs. TRR Management, LLC, et al., filed before the Public Service Commission of the State of Missouri, is referred to as the “Lawsuit”;
10. The “Water System” shall mean the well and all parts of the water system owned by Steed and/or the Steed Respondents that supplies water to the Unit Owners and is at issue in the Lawsuit.

11. Any reference to any of the foregoing companies includes their owners, shareholders, officers, directors, members, managers, employees, attorneys and agents.

12. The term “concerning” means and includes referring to, alluding to, responding to, relating to, connected with, commenting on, in respect of, about, regarding, discussing, involving, showing, describing, reflecting, analyzing and constituting.

13. When information responsive to these requests is maintained in electronic form or requested to be produced in such form, please produce such electronic information in its native form, unless to do so would be unreasonable or render the information unreadable or unusable.

14. When any of the emails, text messages, correspondence and other documents or electronically stored information requested below included attachments or enclosures, please produce all such attachments and enclosures.

**B. Requests.** Please produce the following described documents and electronically stored information:

1. All emails (from any address), text messages (from any number), instant messages (from any source), letters, memos, notes, and other correspondence and documents that You **sent to** any of the following persons or companies from January 1, 2013, through the present, concerning the Water System, including but not limited to payment by the Unit Owners and/or APCOA, control of the Water System and/or charges related to the Water System: Steed; the Steed Respondents; Christiansen; the Christiansen Respondents; APCOA; the Unit Owners; Dean Johnson; Ann George; OCWC; and/or Grady Youngblood.

2. All emails (from any address), text messages (from any number), instant messages (from any source), letters, memos, notes, and other correspondence and documents that You **received from** any of the following persons or companies from January 1, 2013, through the present, concerning the Water System, including but not limited to payment by the Unit Owners and/or APCOA, control of the Water System and/or charges related to the Water System: Steed; the Steed Respondents; Christiansen; the Christiansen Respondents; APCOA; the Unit Owners; Dean Johnson; Ann George; OCWC; and/or Grady Youngblood.

3. All notes, memoranda and transcriptions of any conversation between You and Steed; the Steed Respondents; Christiansen; The Christiansen Respondents; APCOA; the Unit Owners; Dean Johnson; Ann George; OCWC; and/or Grady Youngblood, from January 1, 2013, through the present, concerning the Water System.