

**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 CORPORATE REPRESENTATIVE OF  
JM LAND HOLDINGS, LLC**

**NOTICE IS HEREBY GIVEN** that beginning at 1:00 p.m., on Thursday, October 1, 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 the corporate representative of JM Land Holdings, LLC. It is requested that JM Land Holdings, LLC, designate an individual or individuals to appear at the deposition who have knowledge of the topics listed in **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  
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**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

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**EXHIBIT “A” TO CORPORATE REPRESENTATIVE DEPOSITION NOTICE TO  
JM LAND HOLDINGS, LLC**

**A. Directions/Definitions.**

1. “You,” “your,” “Respondent,” or “JM” shall mean the named Respondent JM Land Holdings, LLC and its members, managers, officers, directors, employees, partners, corporate parent, subsidiaries or affiliates.
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 and Steed are referred to as the “Steed Respondents”;
7. Christiansen, 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. “Claims” shall mean or refer to the claims and allegations asserted by APCOA in the Lawsuit as asserted in the Complaint and all additional documents filed in the Lawsuit.

11. “Defenses” shall mean or refer to the defenses asserted by JM in its Answer to the Complaint, as well in all additional documents filed by JM in the Lawsuit.

12. The “Water System” shall mean the well and all parts of the water system (including all reservoirs, tunnels, shafts, dams, dikes, headgates, pipes, flumes, canals, structures and appliances, and all other real estate, fixtures and personal property, owned, operated, controlled or managed in connection with or to facilitate the diversion, development, storage, supply, distribution, sale, furnishing or carriage of water) owned by Steed and/or the Steed Respondents that supplies water to the Unit Owners and is at issue in the Lawsuit.

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

14. 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.

**B. Examination Topics**

1. The Water System;
2. All communications, both among JM personnel and between JM personnel and other Steed Respondents, concerning the Water System, billing related to the Water System, and use of the Water System;
3. All communications with the Unit Owners and/or APCOA concerning the Water System, billing related to the Water System, and use of the Water System;
4. All communications with OCWC concerning the Water System, billing related to the Water System, and use of the Water System;
5. All communications with the City of Kimberling City concerning the Water System, billing related to the Water System, and use of the Water System;
6. All billing related to the Water System;
7. All billing related to infrastructure fees to the Unit Owners and/or APCOA;

8. The provision of water to the Unit Owners and/or APCOA;
9. The provision of water to other customers;
10. The agreement between JM and/or the Steed Respondents and OCWC concerning the Water System;
11. The agreement between JM and/or the Steed Respondents and the City of Kimberling City concerning the Water System;
12. Maintenance of and repairs to the Water System;
13. The Missouri Department of Natural Resources' oversight and regulation of the Water System;
14. The relationship of following companies and individuals to the Water System: Steed; the Steed Respondents; MJ Land Holdings, LLC; TRR, LLC; Steed Communities Resort, LLC; and Kimberly Steed;
15. APCOA's Claims in the Lawsuit;
16. TRR's Defenses in the Lawsuit.