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BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON

Public Utility Commission of Oregon  
Administrative Hearing Division

UW 120

In the Matter of:

CROOKED RIVER RANCH WATER  
COMPANY

)  
)  
) MOTION TO QUASH SUBPOENA  
) DUCES TECUM  
)  
)  
)  
)  
)

COMES NOW Crooked River Ranch Water Company and submits a Motion to Quash the Subpoenas Duces Tecum issued by Patrick Power on August 17 and August 29, 2007.

MEMORANDUM OF LAW

The CRRWC does not recognize the authority of purported Administrative Law Judge Patrick Power to issue the Subpoenas Duces Tecum or make any ruling which affects the legal rights of CRRWC.

Mr. Power is not licensed to practice law in the State of Oregon. Under the holding of Oregon State Bar vs. Taub, 190 Or. App. 280, 78 P3d, 114 (2003) the practice of the law means the exercise of professional judgment in applying legal principles to address another persons individualized needs through analysis, advice or other assistance. This definition of law practice has two aspects: exercise of professional judgment and application of legal principles to individual cases.

1- MOTION TO QUASH

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ATTORNEYS AT LAW  
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Based on this matter to date and the rulings made by Mr. Patrick Power there is no question that Mr. Power has engaged in the unauthorized practice of law by analysis of evidence and application of legal principles.

This matter has been reported to the Jefferson County District Attorney's Office, Oregon Attorney General and Unauthorized Practice of Law Committee at the Oregon State Bar. Until legal authority has been provided for the administration of this case by Mr. Patrick Power or a ruling has been made by a court of competent jurisdiction the CRRWC will not produce documents pursuant to the Subpoenas issued.

RESPECTFULLY submitted this 5 day of October 2007.

GLENN, SITES, REEDER & GASSNER, LLP

  
\_\_\_\_\_  
TIMOTHY R. GASSNER OSB 02309  
Attorney for CRRWC

2- MOTION TO QUASH

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1 CERTIFICATE OF SERVICE

2 I certify that on October 5, 2007, I served the foregoing upon the following, by mailing a  
3 copy by postage prepaid first class to:

4 Charles G. Nichols  
5 PO Box 1594  
6 Redmond, OR 97756

Crooked River Ranch Water Co.  
Brian Elliott, President Board of Directors  
PMB 313-1604 S. Hwy 97  
#2  
Redmond, OR 97756


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8 Public Utility Commission of Oregon  
9 Michael Dougherty  
10 550 Capital St. NE  
11 Ste. 215  
12 Salem, OR 97301

James R. Rooks, General Manager  
Crooked River Ranch Water Company  
PO Box 2319  
Crooked River Ranch, OR 97760

11 Steven Cook  
12 PO Box 1111  
13 Terrebonne, OR 97760

Department of Justice  
Jason Jones  
Regulated Utility & Business Section  
1162 Court St. NE  
Salem, OR 97301-4096

13 Craig Soule  
14 11953 SW Horny Hollow  
15 Crooked River Ranch, OR 97760

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24  
25  
26 3-Certificate of Service

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