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4	BEFORE THE PUBLIC UTILITY COMMISSION	
5	OF OREGON	
6	UM 1248	
7	ROATS WATER SYSTEM, INC., an active Oregon business corporation,	
8	Complainant,	COMPLAINANT ROATS WATER
9	vs.	SYSTEM, INC'S RESPONSE TO DEFENDANT'S BRIEF REGARDING
10	GOLFSIDE INVESTMENTS, LLC, an active Oregon limited liability company,	EVIDENCE ISSUES
11	Defendant.	
12		
13	Roats Water System, Inc ("Roats") believes the information being offered by Golfside	
14	in the form of hearing testimony from its owner and its attorney is irrelevant to the questions	
15	presented.	
16	However, after receiving Golfside's Opening Brief, Roats believes that it must pursue	
17	further discovery concerning privity of contract related evidence concerning Walt Musa and his	
18	relationship with both 523 and Golfside. Although Roats intends to allege that the tariff	
19	obligations apply to any owner of the land, it also intends to argue that even if the obligations	
20	can be terminated through a sale to a "different" entity, the entity which currently owns the	
21	property is not sufficiently distinct from the original owner anyway.	
22	If after that discovery is completed, the parties cannot stipulate to facts concerning Mr.	
23	Musa's involvement with the entities which have held title to the land during the period in	

question, Roats may also be asking for an evidentiary hearing.

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1	Roats requests that the decision as to whether an evidentiary hearing is necessary be postponed		
2	until the issues are fully addressed in discovery. Possibly some stipulations could also be		
3	negotiated to avoid further delay or evidentiary hearings.		
4	DATED THIS day of October 2006.		
5	BRYANT, LOVLIEN & JARVIS,		
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8	MARK G. REINECKE, OSB # 91407 Of Attorneys for Roats Water Systems		
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	2 – COMPLAINANT'S RESPONSE TO DEF'S BRIEF RE EVIDENCE \$ASQUM 1248 Roats Response to Evidence Issues		