

**SOAH DOCKET NO. 582-23-01502
TCEQ DOCKET NO. 2021-0421-WR**

APPLICATION BY THE PORT OF CORPUS CHRISTI AUTHORITY OF NUECES COUNTY FOR WATER USE PERMIT NO. 13630	§ § § § §	BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS
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**PROTESTANTS’ UNOPPOSED MOTION FOR EXTENSION OF TIME
TO FILE EXCEPTIONS TO THE PROPOSAL FOR DECISION AND REPLIES**

TO THE GENERAL COUNSEL OF THE TEXAS COMMISSION ON ENVIRONMENTAL QUALITY AND THE HONORABLE JUDGES MCCABE AND HENDERSON:

Ingleside on the Bay Coastal Watch Association and Encarnacion Serna (collectively, “Protestants”) file this, their Unopposed Motion for Extension of Time to File Exceptions to the Proposal for Decision and Replies in the above-referenced matter, and in support thereof, would respectfully show the following:

BACKGROUND & BASIS FOR EXTENSION

The Administrative Law Judges issued their Proposal for Decision and Proposed Order (“PFD”) on January 22, 2024. Exceptions to the PFD are currently due on February 12, 2024, and replies to exceptions are due on February 21, 2024. Protestants respectfully request extensions so that exceptions will be due February 20, 2024, and replies to exceptions will be due on February 29, 2024.

This request is not being sought for purposes of delay, but to ensure that the parties have sufficient time to address the PFD. The PFD is approximately 100 pages and addresses a number of issues. Counsel for Protestants has had a number of filing deadlines and other commitments since the issuance of the PFD, including out-of-town commitments the week of February 5 that have necessitated the requested additional time to thoroughly address the PFD.

CONFERENCE WITH OTHER PARTIES

As indicated in the Certificate of Conference, the parties to this docket are unopposed to the requested extensions.

PRAYER

Based on the above reasons, Protestants respectfully request the Commission's General Counsel approve the following extensions of time to file exceptions to the PFD and replies to exceptions, pursuant to her authority granted by 30 Tex. Admin. Code § 80.257(b):

1. **Exceptions to the PFD:** February 12, 2024 to February 20, 2024
2. **Replies to Exceptions:** February 21, 2024 to February 29, 2024

Respectfully submitted,

/s/ Eric Allmon
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*Counsel for Ingleside on the Bay Coastal
Watch Association and Encarnacion Serna*

CERTIFICATE OF CONFERENCE

Counsel for Protestants has conferred with counsel for the Applicant, ED, and OPIC on February 2 – 7, 2024, and the parties are unopposed to the Motion for Extension of Time to File Exceptions to the Proposal for Decision and Replies.

/s/ Eric Allmon _____
Eric Allmon

CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the above and foregoing document was served by electronic service to the following parties on February 7, 2024.

/s/ Eric Allmon _____
Eric Allmon

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