SOAH DOCKET NOS. 582-25-02903 / 582-25-02905 TCEQ DOCKET NOS. 2024-1401-DIS / 2024-1406-DIS

APPLICATIONS OF TREASURE ISLAND
LAGUAN AZURE, LLC FOR CREATION
OF GRAYSON COUNTY MUNICIPAL
UTILITY DISTRICT NOS. 6A AND 6B

BEFORE THE
STATE OFFICE
OF
ADMINISTRATIVE HEARINGS

APPLICANT TREASURE ISLAND LAGUNA AZURE, LLC'S REPLY TO EXCEPTIONS TO THE PROPOSAL FOR DECISION

Treasure Island Laguna Azure, LLC ("*Treasure Island*") files the following Reply to Exceptions to the Proposal for Decision ("*PFD*") issued by the Administrative Law Judge ("*ALJ*") regarding the petitions to create Grayson County Municipal Utility District ("*MUD*") Nos. 6A and 6B ("*Petitions*").

As the ALJ has aptly concluded, the City of Van Alstyne's 'exceptions' to the PFD are not exceptional; they are the very same arguments that the City made in its closing briefs following the conclusion of the hearing on the merits. In other words, the City takes exception to the ALJ's PFD by merely regurgitating arguments that the ALJ previously heard, considered, and rejected. Accordingly, the City's Exceptions provide no basis for amending or reconsidering the ALJ's PFD or any provision of the ALJ's proposed final order.

Respectfully submitted,

McGinnis Lochridge, LLP

Derek Seal / State Bar No. 00797404

1111 W. 6th St., Bldg. B, Ste. 400

Austin, Texas 78703 Phone: 512.495.6175 dseal@mcginnislaw.com

COATS | ROSE

Bryan J. Moore / State Bar No. 24044842

p: 512.541.3594

e: bmoore@coatsrose.com

2700 Via Fortuna, Suite 350

Austin, Texas 78746 Phone: 512.469.7987

Fax: 512.469.9408

ATTORNEYS FOR APPLICANT

CERTIFICATE OF SERVICE

I hereby certify that, on September 15, 2025, a true and correct copy of Applicant's Reply to Exceptions has been served via electronic mail or U.S. Mail on the following:

For the Executive Director:

Kayla Murray, Staff Attorney Harrison Cole Malley, Staff Attorney TCEQ Environmental Law Division, MC-173 P.O. Box 13087

Austin, Texas 78711-3087

Email: kayla.murray@tceq.texas.gov
Email: harrison.malley@tceq.texas.gov

Public Interest Counsel:

Josiah Mercer, Public Interest Counsel TCEQ, Public Interest Counsel, MC-103

P.O. Box 13087 Austin, Texas 78711-3087

Email: josiah.mercer@tceq.texas.gov

Requester(s):

Emily W. Rogers, Stephanie P. Albright and

Joshua D. Katz

BICKERSTAFF HEATH DELGADO ACOSTA LLP 1601 South MoPac Expressway, Suite C400

Austin, Texas 78746

Email: erogers@bickerstaff.com
Email: salbright@bickerstaff.com
Email: jkatz@bickerstaff.com

Derek Seal

And Mel