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**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO****PUCO**

In the Matter of the Complaint of the )  
**GREEN COVE RESORT I OWNERS'** )  
**ASSOCIATION** as to the unjust, )  
unreasonable and illegal sewer rates )  
charged by Carroll Township Treatment )  
Services, LLC and **REQUEST FOR AN** )  
**EMERGENCY RATE DECREASE** )

Case No. 00-1595 ST-CRC

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**MOTION OF THE COMPLAINANT FOR THE ISSUANCE OF  
SUBPOENAS TO PRODUCE DOCUMENTS**

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The Complainant, Green Cove Resort I Owners' Association,  
("Complainant"), pursuant to Ohio Administrative Code Rule 4901-1-25, respectfully  
requests that the Public Utilities Commission of Ohio ("Commission") issue the attached  
subpoenas in order to compel testimony from, and the production of documents for  
inspection and copying to the following:

Marc S. Gerken  
4280 Randmore Rd.  
Columbus, OH 43220

Worline & Associates Inc  
210 South Main Street  
Swanton, OH 43558

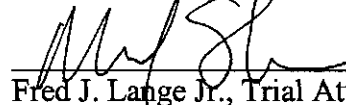
Worline T R & Associates Inc  
1255 Scott Street  
Napoleon, OH 43545

The attached subpoenas provide that the witnesses will be required to produce  
documents for inspection and copying on October 1, 2001 by the law firm of Fuller &  
Henry Ltd, One Seagate, Toledo, Ohio 43603. The Complainant requests that the

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attorney examiner sign the proposed subpoenas so that the above-mentioned may be compelled to produce the requested documents.

Respectfully submitted,



Fred J. Lange Jr., Trial Attorney (0019746)

Dennis A. Lyle (0025605)

Fuller & Henry Ltd

One SeaGate, Suite 1700

P.O. Box 2088

Toledo, OH 43603-2088

Telephone: (419) 247-2529

Telecopier: (419) 247-2665

Mark A. Shaw (0059713)

Fuller & Henry Ltd

35 North Fourth Street, Suite 310

Columbus, Ohio 43215-3612

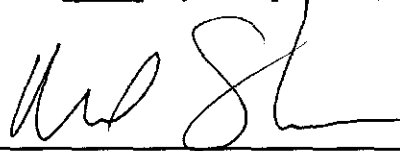
Telephone: (614) 228-6611

Telecopier: (614) 228-6623

Attorneys for Green Cove Resort I Owners'  
Association

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of the foregoing *Motion for Issuance of Subpoenas* has been duly served by ordinary mail, upon, Sally W. Bloomfield, at her office address of Bricker & Eckler, L.L.P., 100 South Third Street, Columbus, Ohio, 43215-4291, and upon Duane Luckey, Office of the Attorney General, 180 East Broad Street, Columbus, OH 43215 this 17<sup>th</sup> day of September, 2001.

A handwritten signature in black ink, appearing to be 'MSL', written over a horizontal line.

An Attorney for Complainant Green Cove  
Resort I Owners' Association

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Case No. 00-1595 ST-CRC

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**SUBPOENA**


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To: Marc S. Gerken  
4280 Randmore Rd.  
Columbus, OH 43220

You are hereby required to attend and give testimony and/or to produce documents for inspection and copying to the law firm of Fuller & Henry Ltd, One SeaGate, Ste. 1700, Toledo, Ohio 43603, phone 419-247-2061, on October 1, 2001 relevant to the above-captioned matter including but not limited to the following:

Any and all business documents; financial statements, (including daily, weekly, monthly, quarterly or annually); ledgers; prospectus; loan documents; purchase agreements; draft documents; real estate documents; non-privileged communication regarding operation of entities; work papers; notes; audits and audit reports; tax returns; accounting records; invoices; financial projections; blueprints and diagrams regarding the resort layout; and any other non-privileged documents from 1985-present regarding any and all of the following:

- 1.) Greencove Development Corporation,
- 2.) Greencove Condominium Group,
- 3.) WildWings Inc.,
- 4.) WWCII,
- 5.) Frank Harris,
- 6.) Walter Harris,
- 7.) Construction Basics,
- 8.) Napoleon Engineering,
- 9.) Worline & Associates.

  
Public Utilities Commission of Ohio  
180 East Broad Street  
Columbus, Ohio 43266-0537

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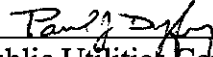
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