

ATTORNEYS

900 Riverview Tower | 900 S. Gay Street | Knoxville, TN 37902-1810 Mailing Address: Post Office Box 900 | Knoxville, TN 37901-0900

Phone: (865) 215-1000 | Fax: (865) 215-1001

www.wmbac.com

DALE C. ALLEN
J. NICHOLAS ARNING, JR.
HUGH B. BRIGHT, JR.
LUIS C. BUSTAMANTE
W. KYLE CARPENTER
APRIL A. CARR
WILLIAM F. CLAYTON
J. KEITH COATES, JR.
J. CHADWICK HATMAKER
DEAN T. HOWELL
KAITLYN E. HUTCHERSON
HOWARD E. JARVIS
C. ELIZA SCOTT JONES
J. FORD LITTLE
GREGORY C. LOGUE

ROBERT S. MARQUIS RICHARD S. MATLOCK DENNIS R. MCCLANE DANIEL J. MOORE M. DENISE MORETZ ROBERT P. NOELL R. JOSEPH PARKEY, JR. KEVIN N. PERKEY GRAYSON K. SCHLEPPEGRELL O. E. SCHOW, IV PAUL C. SHUMAN C. GAVIN SHEPHERD M. AARON SPENCER KAITLIN F. TWEEL ROBERT L. VANCE LOUIS C. WOOLF (RETIRED)

December 17, 2018

Via Electronic Mail and Federal Express (tpuc.docketroom@tn.gov)

Tory Lawless, Acting Docket Manager Tennessee Public Utility Commission 502 Deaderick Street, 4<sup>th</sup> Floor Nashville, Tennessee 37243

Re: In Re: Petition of the Laurel Hills Water System Receivership for Provisional

Certificate of Public Convenience and Necessity

Tennessee Public Utility Commission, Docket No. 17-00098

Dear Ms. Lawless:

Attached is Renegade Mountain Community Club's Motion to Withdraw Petition to Intervene and proposed Order to be filed in the above-styled matter. The original and four copies will follow by Federal Express. Copies of the Motion have been served by first class mail on the parties listed in the Certificate of Service.

Thank you for your assistance in this matter.

4234667.1

Page 2 December 17, 2018

DJM:ar Enclosure

cc: Mr. Michael McClung
Robert Schwerer, Esq.
Aaron Conklin, Esq.
G. Everett Sinor, Jr., Esq.
Robert E. Moore, COO

Scott D. Hall, Esq. Roger York, Esq.

Vance L. Broemel, Esq. Daniel P. Whitaker, III, Esq.

023387.0001

## IN THE TENNESSEE PUBLIC UTILITY COMMISSION AT NASHVILLE, TENNESSEE

111 1 11 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1		141114000	
IN RE:	)		
	)		
PETITION OF THE LAUREL HILLS	)		
WATER SYSTEM IN RECEIVERSHIP	)	Docket No. 17-00098	
FOR PROVISIONAL CERTIFICATE OF	)		
PUBLIC CONVENIENCE AND NECESSITY	)		

## MOTION TO WITHDRAW PETITION TO INTERVENE

COMES NOW Renegade Mountain Community Club ("RMCC"), by and though counsel, and hereby moves that RMCC be permitted to withdraw its intervention in the above-styled matter. In support its motion, RMCC states as follows:

- 1. RMCC moved to intervene in this matter by Petition to Intervene dated October 11, 2017.
- 2. RMCC's Petition to Intervene was granted by Order entered on November 9, 2017.
- 3. Recent appellate litigation in the matter styled *Haiser*, et., al., v. McClung, et., al., In The Court Of Appeals For The State Of Tennessee, Eastern Section At Knoxville, Case No. E2017-00741-COA-R3-CV, has raised issues of the authority of RMCC to intervene and participate in this matter.
- 4. For this reason, RMCC moves that it be allowed to withdraw its Petition to Intervene and be dismissed from this matter.

Respectfully submitted this 17 day of December, 2018.

WOOLF, McCLANE, BRIGHT, ALLEN & CARPENTER, PLLC

By:

Damel J. Moore, BPR No. 011615 Post Office Box 900 Knoxville, Tennessee 37901-0900

(865) 215-1000

## **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and exact copy of the foregoing pleading has been served upon the following counsel for the parties in interest herein by delivering same to the offices of said counsel, or by mailing same to the offices of said counsel by United States Mail with sufficient postage thereon to carry the same to its destination.

Aaron Conklin, Esq.
Staff Attorney
Tennessee Public Utility Commission
502 Deaderick Street, Fourth Floor
Nashville, Tennessee 37243

G. Everett Sinor, Jr.
Attorney at Law
Counsel for Receivership Management, Inc.
3504 Robin Road
Nashville, Tennessee 37204

Robert E. Moore, Jr. Chief Operations Officer 1101 Kermit Drive, Suite 735 Nashville, Tennessee 37217

Scott D. Hall, Esq.
Counsel for Moy Toy, LLC
Counsel for Terra Mountain, LLC
74 Forks of the River Parkway
Sevierville, TN 37862

Roger York, Esq. York & Bilbrey 456 North Main Street, Suite 201 Crossville, Tennessee 38555

Heather G. Anderson, Esq. 116 Agnes Road Knoxville, Tennessee 37919

Vance L. Broemel, Senior Counsel
Daniel P. Whitaker III, Assistant Attorney General
Counsel for Herbert H. Slatery, III, Attorney General
and Reporter State of Tennessee
Office of the Tennessee Attorney General
Public Protection Section
Consumer Protection and Advocate Division
P.O. Box 20207
Nashville, Tennessee 37202-0207

This the 17 day of Jecember, 2018.

Attorney

Attorney

## IN THE TENNESSEE PUBLIC UTILITY COMMISSION AT NASHVILLE, TENNESSEE

<b>DECEMBER, 2018</b>		
IN RE:  PETITION OF THE LAUREL HILLS  WATER SYSTEM IN RECEIVERSHIP  FOR PROVISIONAL CERTIFICATE OF  PUBLIC CONVENIENCE AND NECESSIT	) ) ) ) Docket No. 17-00098 ) Y	
ORDER PERMITTING WIT	HDRAWAL AND DISMSSAL	
Upon motion of Renegade Mountain	Community Club ("RMCC") by and though	
counsel, and for good cause shown, IT IS HER	REBY ORDERED that RMCC be and hereby is	
permitted to withdraw its intervention in the abo	ove-styled matter and RMCC is hereby dismissed	
from this matter without prejudice.		
Mo	nica Smith-Ashford, Hearing Officer	