



Public Service Commission

-M-E-M-O-R-A-N-D-U-M-

DATE: August 5, 1997
TO: Division of Records & Reporting
FROM: Rosanne G. Capeless, Senior Attorney, Division of Legal Services *RGC*
RE: Docket No. 970429-WS - Joint application for authority to transfer Certificates Nos. 336-W and 291-S in Martin County from Ranchor/Plantation Corporation d/b/a Plantation Utilities to IHC Realty Partnership, L.P. d/b/a Plantation Utilities.

Please file the attached letter, dated July 3, 1997, from Stephen B. Moss of Holland & Knight, LLP, in the above referenced docket file.

RGC:mw

cc: Division of Water & Wastewater (Golden, Redemann)

- ACK _____
- AFA _____
- APP _____
- CAF _____
- CMU _____
- CTR _____
- EAG _____
- LEG _____
- LIN _____
- OP _____
- RCH _____
- SEC 1
- WAS _____
- JTH _____

DOCUMENT NUMBER-DATE

07922 AUG-56

FPSC-RECORDS/REPORTING

Roseanne

Law Offices

HOLLAND & KNIGHT

A Registered Limited Liability Partnership

One East Broward Boulevard
P.O. Box 14070 (ZIP 33302-4070)
Fort Lauderdale, Florida 33301
954-525-1000
FAX 954-463-2030

Atlanta	Orlando
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July 3, 1997

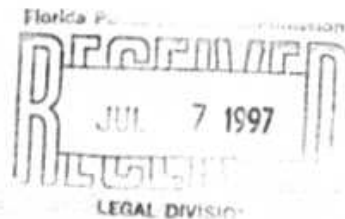
STEPHEN B. MOSS
954-468-7857

Internet Address:
smoss@hklaw.com

VIA HAND DELIVERY

Roseanne Capeless
Division of Legal Service
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Re: Indian River Plantation



Dear Ms. Capeless:

I was one of the attorneys who represented IHC Realty Partnership, L.P. in its purchase of Indian River Plantation. My partner, Bruce May, and Marty Deterding informed me that you are uncomfortable with accepting a copy of the Special Warranty Deed as sufficient evidence that this purchase was an arms-length transaction. With title insurance coverage, Special Warranty Deeds have become the standard (at least in South Florida) document of conveyance in commercial real estate transactions. This was an arms-length transaction, and the recorded Special Warranty Deed indicates a significant amount of documentary stamps which reflect the real estate portion of the purchase price.

Our client received a marked-up title insurance commitment at closing, and we anticipate that our client will receive its title insurance policy in approximately two (2) weeks. We should be pleased to send you a copy of the marked-up commitment as well as the policy.

Please let me know if we may be of any assistance to you in the processing of our client's application for transfer of the utility plant from Radnor/Plantation Corporation. Thank you.

Very truly yours,

HOLLAND & KNIGHT LLP

By: Stephen B. Moss

cc: Bruce May
F. Marshall Deterding

FTL1-252256