## BEFORE THE PUBLIC SERVICE COMMISSION STATE OF MISSOURI

The Staff of the Missouri F Commission,	Public Service	)	
	Complainant,	)	
VS.		)	Case No. WC-2015-0330
Fawn Lake Water Corp. and Rachel Hackman,	nd	)	
	Respondents.	)	
The Office of the Public Co An agency of the State of		)	
	Complainant,	)	
VS.		)	Case No. WC-2015-0340
Fawn Lake Water Corp., Rachel Hackman, A Missouri water corporati	on,	) ) )	
	Respondents.	)	

## **RESPONDENTS' STATUS REPORT**

**COME NOW** the Respondents, by and through the undersigned counsel, and file this status report with the Commission. In support thereof, the undersigned states as follows:

- 1. On February 16, 2016, the Commission issued Orders in both of the above stated cases that directed the parties to file another status report no later than April 15, 2016. This filing complies with the Commission's Orders.
- 2. Respondents state that conversations between the parties continue. Without admitting any allegation contained in the Complaints, Respondents are in the

process of organizing and finalizing a sale of the entity to a new buyer. At this time

counsel for Respondents is in the process of assisting the Respondents and the new

buyer in setting up the sale and proceeding with the process of sale, transfer and

acquisition of water system to the new buyer, and preparing all necessary Commission

filings for such.

3. Further, Respondents are still engaged in discussions with the potential

buyer for the water system. Additional time is necessary to allow discussions to

continue and for the potential buyer to finalize financing.

4. Further, counsel for Respondents has had to enter his appearance in

regards to this matter as former counsel is no longer employed with the law firm and her

new employment does not allow continuation of representation in this matter.

5. Respondents continue to hope that an amicable resolution can be reached

and agree to file another status report in 60 days to update the Commission of further

progress.

6. Counsel for Respondent has spoken with Staff Attorney Mueth and she

has indicated that Staff and Counsel have no objection to Respondent's request for

additional time to finalize the financing and sale of the water system.

WHEREFORE, the undersigned respectfully requests an additional 60 days to

continue working on the sale and all requirements for the sale and agree to file another

status report to apprise the Commission of progress made.

Respectfully submitted,

HERNANDEZ LAW FIRM, LLC

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## ATTORNEY FOR RESPONDENTS

## **Certificate of Service**

I certify that a true copy of the above and foregoing was served by electronic mail to all counsel of record this 15th<sup>th</sup> day of April 2016.

<u>/s/ Arturo A. Hernandez, III</u> Arturo A. Hernandez, III