# BEFORE THE PUBLIC SERVICE COMMISSION



### OF THE STATE OF MISSOURI

		Missouri Public Service Commission
CLORIS and Ronald TORREY,	)	)
Plaintiff,	)	
v.	)	File No: GC-2015-0111
Laclede Gas	)	
Defendants	)	

# JURISDICTION CHALLENGE AND RESPONSE RENEWED MOTION TO DISMISS AND MOTION TO STRIKE FOR INSUFFICIENCY (NON-TELEPHONIC)

COME NOW Cloris and Ronald Torrey move the Public Service Commission ("PSC") to leave to Strike for Insufficiency and establish that the Public Service Commission has no Jurisdiction to hear any pleadings that are currently before the Federal Court that may be Criminal in nature at the conclusion by resolution.

There are no contract implied or otherwise between Plaintiff and Defendants. Whereas plaintiff must attack the interest of Bryan Cave Law Firm or enjoin by conspiracy.

Impropriety of Pleadings. On the Court's or party motion, the Court may either (1) dismiss any pleading that is, overall scandalous, impertinent or considering the nature of the cause of action, abusive of the Court or another person; or (strike any such part of the pleading or any party thereof that is immaterial or redundant. The order of dismissal shall comply with R.4:37-(a)

may expressly require as a condition of the refilling of a pleading asserting a claim or defense based on the same transaction, the payment by pleading party of attorney's fees and cost incurred by the party who moved for dismissal.

Respondent have failed to refuse to enjoin its interest subsequence to the final decision before the United States

Court. Respondent must prove by documentation that its interest is protected by the come or conclusion and

violation of Federal Law. The law requires proof of jurisdiction to appear on the record of the administrative agency and all administrative proceedings. "Hagans v. Lavine 415 U.S. 533

## CONCLUSION

Complainants respectfully request the Commission accept this Reponses to and Stricken Respondent m Motion to Dismiss.

Date: November 20 2014

Respectfully Submitted

Cloris Banks Torrey 9422 Westchester Drive St. Louis MO 63136 314 314-801-7517 Subscribed and sworn before me on 70th day of November 2014.

CHELSEA DITTO
Notary Public - Notary Seal
State of Missouri
Commissioned for St. Louis County
My Commission Expires: April 21, 2018
Commission Number: 14607366

Notary Public

My Commission Expires: 4/20/2018

## **Certificate of Service**

The undersigned certifies that a true and correct copy of the foregoing pleading was served on Complainant ,the General Counsel of the Staff of the Missouri Public Service Commission , the Office of Counsel on this 21th day of November, 2014 by United States mail .