

**BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI**

In the Matter of the Application of Grain Belt Express )  
Clean Line LLC for a Certificate of Convenience and )  
Necessity Authorizing it to Construct, Own, Operate, )  
Control, Manage, and Maintain a High Voltage, Direct ) Case No. EA-2014-0207  
Current Transmission Line and an Associated Converter )  
Station Providing an interconnection on the Maywood - )  
Montgomery 345 kV Transmission Line )

**MATTHEW AND CHRISTINA REICHERT'S  
RESPONSE IN OPPOSITION  
TO GRAIN BELT EXPRESS CLEAN LINE LLC'S MOTION IN LIMINE  
REGARDING THE ISSUE OF EMINENT DOMAIN**

Matthew and Christina Reichert (Reicherts) file this Response in Opposition to Grain Belt Express Clean Line LLC's (GBE's) Motion in Limine Regarding the Issue of Eminent Domain. The Reicherts state the following:

1. On October 31, 2014, GBE filed its Motion In Limine Regarding the Issue of Eminent Domain. Doc. 265.
2. GBE has asked the Missouri Public Service Commission (PSC) to exclude parts of the testimony by Christina Reichert, Roseanne Meyer, and Boyd Harris that relate to eminent domain. Doc. 265 at 6.
3. On November 3, 2014, Show Me Concerned Landowners, Missouri Farm Bureau Federation, and United for Missouri filed Responses in opposition to GBE's Motion In Limine. Doc. 268, 269, and 270.
4. The Reicherts join in the Responses by Show Me Concerned Landowners, Missouri Farm Bureau Federation, and United for Missouri. The Reicherts adopt those entire responses and incorporate those responses by reference into the Reicherts' Response.

5. Randall and Roseanne Meyer (Meyers) join in the Reicherts' Response in Opposition to GBE's Motion In Limine.

Therefore, the Reicherts and Meyers respectfully request that the PSC deny GBE's Motion In Limine and order any other relief that is appropriate.

Respectfully submitted,  
Law Office of Gary Drag

*/s/ Gary Drag*

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and Randall and Roseanne Meyer

### **CERTIFICATE OF SERVICE**

I certify that true and accurate copies of this document were sent by e-mail on November 6, 2014, to all parties on the official service list for this case.

*/s/ Gary Drag*

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Gary Drag, MBN 59597  
Attorney for Matthew and Christina Reichert  
and Randall and Roseanne Meyer