

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

The Staff of the Missouri Public)	
Service Commission,)	
)	
Complainant,)	
)	Case No. WC-2022-0295
v.)	SC-2022-0296
)	
I-70 Mobile City, Inc.)	
d/b/a I-70 Mobile City Park,)	
)	
Respondent.)	

MOTION FOR CONTINUANCE

Respondent, I-70 Mobile City, Inc. d/b/a I-70 Mobile City Park (“I-70 Mobile City”), by and through counsel, and for its Motion for Continuance states as follows:

1. On April 14, 2023, Staff of the Missouri Public Service Commission (“Staff”) filed a Motion to Compel Answers to Certain Data Requests (“Motion to Compel”) with the Commission.
2. I-70 Mobile City filed its Response on April 24, 2023.
3. A WebEx hearing on Staff’s Motion to Compel is currently set for May 24, 2023, at 1:30 p.m.
4. The parties are currently in the process of discussing a possible settlement to resolve the issues in the above-captioned case and ask for a continuance of two weeks within which a proposed stipulation containing language previously discussed with counsel for Staff will be drafted. The parties will use that time to work through any further discussions to arrive at a resolution acceptable to all parties.
5. Counsel for Staff has been contacted regarding this motion and

consents to the extension of the hearing on Staff's Motion to Compel in this case of 14 days.

6. This motion is made in the interest of justice and not with the intent to unreasonably delay or hinder these proceedings in any manner.

WHEREFORE, for the foregoing reasons, I-70 Mobile City requests the Commission to continue this matter for 14 days, and if the parties have not provided reasonable assurances of or entered into a settlement agreement to resolve this case by the end of that time, then to reset the Staff's Motion to Compel for hearing and argument, and for such other orders it deems reasonable and just under the circumstances.

Respectfully submitted,

ELLINGER BELL LLC

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Attorneys for I-70 Mobile City, Inc.

d/b/a I-70 Mobile City Park

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served upon all of the parties of record or their counsel, pursuant to the Service List maintained by the Data Center of the Missouri Public Service Commission, on this May 24, 2023.

/s/ Stephanie S. Bell
Stephanie S. Bell