

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

**ANCHOR’S POINT CONDOMINIUM
OWNERS ASSOCIATION, INC.,**)
)
)
Complainant,)

v.) **File No. WC-2020-0048**

TRR MANAGEMENT, LLC;)
FRANK J. STEED, JR., d/b/a)
STEED COMMUNITIES;)
JM LAND HOLDINGS, LLC; TRR)
TIME SHARE, LLC; CARROLL)
JAMES CHRISTIANSEN;)
KIMBERLING INN, INC.; and)
KIMBERLING PROPERTIES, INC.)
)
Respondents.)

**JOINT MOTION TO RESCHEDULE HEARING DATE
AND AMEND ORDER ESTABLISHING PROCEDURAL
SCHEDULE AND OTHER PROCEDURAL REQUIRMENTS**

COME NOW Complainant Anchor’s Point Condominium Owners Association, Inc. (“APCOA”) and TRR Management, LLC, Frank J. Steed, Jr. d/b/a Steed Communities, JM Land Holdings, LLC, and TRR Time Share, LLC, Carroll James Christiansen, Kimberling Inn, Inc., and Kimberling Properties, Inc. (collectively, “Respondents”), by and through their respective counsel, and for this Joint Motion to Reschedule Hearing Date and Amend Order Establishing Procedural Schedule and Other Procedural Requirements, state as follows:

1. On March 18, 2020, the Commission entered an Order Establishing Procedural Schedule and Other Procedural Requirements (the “Order”), after the parties and Staff submitted a joint procedural schedule.

2. A hearing in this matter is presently scheduled for October 26, 2020, and under the Order (as amended) the parties are required to meet and abide by a variety of deadlines regarding completion of depositions, submission of testimony, etc.

3. As previously indicated, the parties to this action have been engaged in substantive settlement discussions and have exchanged various proposed settlement documents, which are presently under review and consideration.

4. To facilitate the possible settlement of this matter, the parties propose that the hearing before the Commission be rescheduled and that the Commission enter a new Order Establishing Procedural Schedule and Other Procedural Requirements.

5. The parties propose the following new dates for consideration:

<u>Date</u>	<u>Event</u>
October 6, 2020	Last date to conduct depositions
November 3, 2020	Summary determination motion filing deadline
December 29, 2020	Direct testimony (complainant)
January 12, 2021	Rebuttal testimony (respondents)
January 26, 2021	Surrebuttal testimony (complainant)
February 2, 2021	Last day to request discovery
February 8, 2021	Parties file issues list, order of witnesses, time limits
February 15, 2021	Parties file position statements
February 23, 2021	Hearing
March 19, 2021	Post-hearing briefs
April 9, 2021	Reply briefs

6. Counsel for Staff has been contacted and do not object to the requested extension.

7. This Motion is brought in good faith and is not being made for the purpose of undue delay or any other improper purpose.

WHEREFORE, Complainant respectfully requests this Commission reschedule the hearing in this matter and enter new Order Establishing Procedural Schedule and Other Procedural Requirements accordingly; and for such other and further relief as the Commission deems just and proper.

**Lowther Johnson
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CERTIFICATE OF SERVICE

This is to certify that on August 3, 2020, a true and correct copy of the above and foregoing was filed and served electronically by the Public Service Commission to all parties receiving electronic notice:

/s/ J. Michael Bridges