

**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 STAY PROCEEDINGS
AND SUSPEND PROCEDURAL SCHEDULE**

COME NOW Complainant Anchor’s Point Condominium Owners Association, Inc. (“APCOA”) and Respondents 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 Stay Proceedings and Suspend Procedural Schedule, state as follows:

1. On October 9, 2020, the Commission entered an Order Granting Motion to Reschedule Hearing and Modify Procedural Schedule (the “Order”).
2. At present, a hearing in this matter is presently scheduled for April 27, 2021, and under the Order the parties are required to meet and abide by a

variety of deadlines regarding completion of depositions, submission of testimony, etc.

3. As the parties have previously indicated, they have been and still are engaged in substantive settlement discussions and have exchanged various proposed settlement documents, the latest versions of which are presently under review and consideration.

4. In addition, APCOA is actively investigating whether and how it may be able to drill its own well to serve its members – the Anchor’s Point Condominium owners. To that end, the APCOA board members have been conferring and are continuing to confer with a licensed well driller, an engineer, and representatives of the Missouri Department of Natural Resources and the U.S. Army Corps of Engineers, to determine the feasibility of such a private well and whether it could be licensed and approved.

5. Under these circumstances, to facilitate the possible settlement of this matter and to allow APCOA to fully investigate the possibility of a private well to serve its members, the parties propose that the Commission enter an Order staying the proceedings in this matter and suspending the procedural schedule that is currently in place.

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 and Respondents respectfully request that the Commission enter an Order staying the proceedings in this matter and suspending the current procedural schedule until such time as either party requests a new procedural schedule; and for such other and further relief as the Commission deems just and proper.

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CERTIFICATE OF SERVICE

This is to certify that on November 9, 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