

**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.** )

**COMPLAINANT’S MOTION FOR EXTENSION  
OF TIME TO FILE RESPONSE TO STAFF REPORT**

COMES NOW Anchor’s Point Condominium Owners Association, Inc. (“APCOA”), by counsel, and for its Motion for Extension of Time to File Response to the Staff Report, states as follows:

1. On August 26, 2019, APCOA filed a complaint with the Missouri Public Service Commission (the “Commission”) against 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. (collectively, “Respondents”). The Complaint alleged Respondents were a public water utility and requested that the Commission assert jurisdiction over the utility.

2. On January 16, 2020, the Commission's Staff filed its Staff Report, pursuant to an order from the Commission.

3. On January 22, 2020, the Commission ordered APCOA to file a response to the Staff report no later than February 5, 2020 (the "Response").

4. Counsel for the APCOA has been working on the Response but seeks a seven-day extension to finalize the Response, making its new due date February 12, 2020.

5. Counsel for Staff and for Respondents have been contacted and do not object to the requested extension.

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

WHEREFORE, Complainant respectfully requests this Commission enter an Order setting the new deadline to file a response to the Staff Report up to and including February 12, 2020; and for such other and further relief as the Commission deems just and proper.

**HUSCH BLACKWELL LLP**

/s/ J. Michael Bridges

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**CERTIFICATE OF SERVICE**

This is to certify that on February 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* \_\_\_\_\_