

IN THE CIRCUIT COURT OF COLE COUNTY, MISSOURI

CIRCUIT DIVISION

PUBLIC SERVICE COMMISSION )  
OF THE STATE OF MISSOURI, )  
 )  
Plaintiff, )  
 )  
vs. )  
 )  
HICKORY HILLS WATER )  
& SEWER CO., INC., )  
 )  
Defendant. )

Case No.: 06AC-CC00885

**MOTION FOR AUTHORITY TO  
EXECUTE ASSET PURCHASE AGREEMENT TO  
SELL ASSETS OF HICKORY HILLS WATER & SEWER CO., INC.**

Comes now the Court-appointed Receiver and Attorney, and for his Motion for Authority to Execute Asset Purchase Agreement to Sell Assets of Hickory Hills Water & Sewer Co., Inc., states to the Court as follows:

1. As the Court file in this matter reflects, the undersigned was appointed as Receiver for Hickory Hills on the 2<sup>nd</sup> day of January, 2007.

That the Receiver was directed to keep the system functioning for the benefit of its customers. To date, that has been accomplished.

Further, pursuant to the Receiver's original appointment, the Receiver was directed to place the system in a position to be sold.

The Receiver has negotiated an Asset Purchase Agreement with Missouri-American Water Company.

2. The sales price for the assets of Hickory Hills Water & Sewer Co., Inc. is in the amount of Fifty Thousand Dollars (\$50,000.00) and said sale proceeds will be dispersed as follows:

First National Bank	\$12,151.94
A & D Construction	\$ 1,490.00
Unpaid Receiver Fees	\$36,358.06

3. Counsel for the Missouri Public Service Commission has had an opportunity to review the proposed Agreement and has no objection thereto.

WHEREFORE, the Court-Appointed Receiver prays that the Court make and enter its Order granting the Receiver authority to execute the Asset Purchase Agreement with Missouri-American Water Company; grant the Receiver further authority to complete the sale as contemplated in said Asset Purchase Agreement; and for such other and further relief as the Court deems just and proper under the premises.

COVER & HILTON LAW, L.L.C.




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#28854

*Attorney and Receiver for  
Hickory Hills Water & Sewer Co., Inc.*

I hereby certify that a copy of the above and foregoing was electronically served on Shelley Brueggemann, Missouri Public Service Commission; and Christina Baker, Office of Public Counsel; and emailed to Timothy W. Luft, Attorney for Missouri-American Water Company, [timothy.luft@amwater.com](mailto:timothy.luft@amwater.com), on this 22 day of June 22, 2015.

  
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