

**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 FOR EXTENSION
OF TIME TO CONDUCT DEPOSITIONS**

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 their Joint Motion for Extension of Time to Conduct Depositions, 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. Under the Order, the Commission set June 12, 2020 as the deadline to conduct depositions, and by this Motion the parties seek an extension to conduct depositions up to and including August 7, 2020.

3. After the Commission entered the Order, many in-person proceedings, such as depositions, were made impossible or impractical and were delayed due to the national COVID-19 pandemic.

4. Additionally, the parties to this action have been engaged in settlement discussions, which have further delayed the urgency of depositions – in hopes that they would be unnecessary if an agreement were reached.

5. The hearing date is currently scheduled for October 26, 2020, with direct testimony from the Complainant due September 4, 2020. The requested extension will not affect the hearing date or the direct testimony date.

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 delay or any other improper purpose.

WHEREFORE, Complainant respectfully requests this Commission enter an Order setting the new deadline to conduct depositions up to and including August 7, 2020; 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 June 8, 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