

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

Director of the Manufactured Housing )  
and Modular Units Program of the )  
Public Service Commission, )  
 )  
Complainant, )  
 )  
vs. )  
 )  
Burkhart Mobile Homes, Inc., )  
 )  
Respondent. )

**Case No. MC-2011-0319**

**DIRECTOR'S MOTION FOR LEAVE TO FILE HIS FIRST  
AMENDED COMPLAINT**

**COMES NOW** the Director of the Manufactured Housing and Modular Units Program of the Missouri Public Service Commission, by and through counsel, and for his *Motion for Leave to File His First Amended Complaint*, states as follows:

1. The Director filed his *Complaint* herein on March 31, 2011.
2. Since that time, the Director has continued to investigate Respondent's activities.
3. The Director seeks leave to file his First Amended Complaint in order to add new allegations of violations and to reform the previous allegations.

**WHEREFORE**, the Director prays that the Commission will grant leave to file his First Amended Complaint; and grant such other and further relief as is just in the circumstances.

Respectfully submitted,

s/ Kevin A. Thompson

**KEVIN A. THOMPSON**

Missouri Bar Number 36288

Chief Staff Counsel

Missouri Public Service Commission

P.O. Box 360

Jefferson City, MO 65102

573-751-6514 (Voice)

573-526-6969 (Fax)

kevin.thompson@psc.mo.gov

Attorney for the Staff of the Missouri  
Public Service Commission.

**Certificate of Service**

I hereby certify that a true and correct copy of the foregoing was served, either electronically or by hand delivery or by First Class United States Mail, postage prepaid, on this **27<sup>th</sup> day of September, 2011**, on the parties of record as set out on the official Service List maintained by the Data Center of the Missouri Public Service Commission for this case.

s/ Kevin A. Thompson