## Before the Public Service Commission Of The State of Missouri

Michele Westmoreland,	)	
Complainant,	)	File No. WC-2015-0171
VS.	)	
Missouri American Water Co.,	)	
Respondent.	)	

## Complainant Michele Westmoreland's <u>Fourth Motion to Extend the Deadline for a Pre-Hearing Conference By Consent</u>

Comes now Complainant Michele Westmoreland and for her Fourth Motion to Extend the Deadline for scheduling a Pre-Hearing Conference states as follows:

- 1. Complainant Michele Westmoreland seeks recompense from Missouri American Water Co. and its insurer, Travelers Insurance Co., for water damage to her home in St. Louis County, MO, sustained on or about December 3, 2013.
- 2. In its Order dated May 19, 2015, the MO Public Service Commission granted Complainant's Second Motion for Additional Time, awarding 30 more days or until June 26, 2015 for the parties to try to resolve their differences.
- 3. Since that time Complainant's expert witness visited the Westmoreland home for the purpose of determining whether or not the December 3, 2013 activity by Missouri American Water Co. caused the damage for which the Westmorelands seek recompense and, if so, the cost involved in making the repairs. According to the Westmorelands' expert, his written report will be available this week. Travelers sent its property estimator to the Westmorelands' home on Friday, June 12, 2015. His report is not yet available. Travelers contemplates sending its own expert back to the Westmorelands' home after it receives the Westmorelands' expert's report. Travelers represents that it can have its expert's written report available within one week of receiving the Westmorelands' expert's finding.
- 4. Ms. Cydney Mayfield, Senior Counsel for the MO Public Service Commission was so apprised of these developments and consented to an additional 60 day extension (or until Tuesday, August 25, 2015) for the parties to attempt to settle the matter. Peter Muzik of Travelers Insurance Co. consented to an additional 60 days'

extension to attempt to settle the matter. After being so advised, Timothy Luft Vice-President (Legal) of MO American Water agreed and consented to an additional 60 days' extension for the parties to attempt to settle the matter. All agreed that their consent to an extension could be so represented to the PSC.

WHEREFORE, with the consent of the other parties, Complainant Michele Westmoreland moves for an additional 60 days or until Tuesday, August 25, 2015 to submit exclusionary dates for a Pre-Hearing Date and Schedule and for such other and further relief as be meet and proper in the premises.

Seltzer & Seltzer, L.C.

By: /s/ Garry Seltzer

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Attorneys for Complainant Michele Westmoreland

## Certificate of Service

I hereby certify that on the  $24^{\text{th}}$  day of June, 2015, I filed a true copy of the foregoing through the EFIS filing system.

/s/ Garry Seltzer
Garry Seltzer