

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

Director of the Manufactured Housing and )  
Modular Units Program of the Missouri Public )  
Service Commission, )  
 )  
Complainant, )  
 )  
v. )  
 )  
CMH Homes, Inc., )  
d/b/a Clayton Homes # 303 )  
and Clayton Homes # 817, )  
 )  
Respondent. )

**File Nos. MC-2016-0032**  
**MC-2016-0055**  
**MC-2016-0067**  
**MC-2016-0074**

**JOINT MOTION TO SUSPEND PROCEDURAL SCHEDULE**

**COMES NOW** the Director of the Manufactured Housing and Modular Units Program of the Missouri Public Service Commission, by and through undersigned counsel, and on behalf of himself and Respondent CMH Homes, Inc. (herein the "Parties"), for its *Joint Motion to Suspend Procedural Schedule*, respectfully states as follows:

1. On October 8, 2015, the Commission issued its *Order Directing Filing* wherein the Parties were instructed to file a status report no later than November 5, 2015.

2. On October 30, 2015, in response to a request by the Respondent to exercise a thirty (30) day reporting extension, the Commission issued its *Order Directing Filing* instructing the Respondent to file a status report no later than December 4, 2015.

3. Since the Commission's initial order, the Parties have made progress in addressing the substantive issues of the complaints. The Director has instructed counsel that successful inspections have been made of two of the four facilities at issue;

the Parks home (MC-2016-0032) and the Allen home (MC-2016-0055). Additionally, the Respondent has made payment to the Public School Fund within thirty days of the agreement.

4. Pursuant to the Parties' agreed terms, the Respondent has notified the Director that the remaining facilities are prepared for inspection. Inspections of the Stack home (MC-2016-0067) and the Nolfo home (MC-2016-0072) have been scheduled for December 17, 2015.

5. Pursuant to the Parties' agreed terms, the Director will withdraw the complaints upon successful completion of a site inspection by Staff. As such, the Parties ask that the Commission suspend the procedural schedule to afford Staff an opportunity to perform inspections.

6. The Parties agree that suspension of this schedule does not affect any obligation or commitment made by the Parties in prior agreements and Commission orders except the date to submit a status report.

7. Upon completion of Staff's inspection, the Director will submit an inspection report. Should the Director's report find no outstanding deficiencies related to the complaints filed in MC-2016-0067 and MC-2016-0072, then the Director shall withdraw the complaints. Should the Director's report find outstanding deficiencies related to the complaints filed in MC-2016-0067 and MC-2016-0072, then the Director shall seek a hearing on its complaints on those case files.

**WHEREFORE**, the Director and CMH Homes, Inc., respectfully request the Commission suspend the procedural schedule in this case to allow the Staff sufficient time to perform inspections.

Respectfully submitted,

**/s/ Hampton Williams**

Assistant Staff Counsel

Missouri Bar No. 65633

Attorney for the Staff of the

Missouri Public Service Commission

P. O. Box 360

Jefferson City, MO 65102

(573) 751-4255 (Telephone)

hampton.williams@psc.mo.gov

**CERTIFICATE OF SERVICE**

I hereby certify that copies of the foregoing have been mailed with first-class postage, hand-delivered, transmitted by facsimile or electronically mailed to all counsel of record this 8<sup>th</sup> day of December, 2015.

**/s/ Hampton Williams**