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

Derald Morgan, Rick and Cindy Graver,	)
William and Gloria Phipps and David Lott,	)
Complainants,	)
v.	) File No. WC-2017-0037
Carl Richard Mills, Carriage Oaks Estates Homes	)
Association, Distinctive Designs and Caring	)
Americans Trust Foundation, Inc. (f/k/a Caring	)
Americans Foundation, Inc.),	)
	)
Respondents.	)

## **MOTION FOR EXTENSION**

Comes now the Respondents by and through counsel, and for their Motion for Extension in these matters hereby state:

- 1. On September 21, 2017, the Complainants served Respondents the First Interrogatories of Complainants Directed to Defendant Caring American Trust Foundation, Inc., First Interrogatories of Complainants Directed to Defendant Carriage Oaks Estates Homeowners Association, First Interrogatories of Complainants directed to Carl Mills (collectively referred to as the "Interrogatories").
- 2. On September 21, 2017, the Complainants also served Respondents the Plaintiff's First Request for Production of Documents to Defendant Caring Americans Trust Foundation, Inc., Plaintiff's First Request for Production of Documents to Defendant Carriage Oaks Estates Homeowners Association and Plaintiffs First Request for Production of Documents to Defendant Carl Mills (collectively referred to as the "Request for Production").
- 3. In addition to responding to various other matters both directly and indirectly related to Complainants' Amended Complaint, Respondents are working on compiling the large amount of

information necessary to properly and accurately respond to the Interrogatories and the Request for Production. As such, the Respondents need more time.

WHEREFORE, Respondents pray that the Commission will grant this request for an extension to file their response to the Interrogatories and Request for Production no later than November 21, 2017.

Respectfully submitted,

## /s/ Whitney Smith

Bryan O. Wade, #41939 Whitney S. Smith #68405 Husch Blackwell LLP 901 St. Louis St., Suite 1800 Springfield, MO 65806

Office: (417) 268-4000 Fax No: (417) 268-4040

Bryan.wade@huschblackwell.com Whitney.smith@huschblackwell.com

Attorneys for Respondents

## **Certificate of Service**

I hereby certify that copies of the foregoing have been mailed or hand-delivered, transmitted by facsimile or electronically mailed to all counsel of record on this 19<sup>th</sup> day of October, 2017.

/s/ Whitney Smith