

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

Director of the Manufactured Housing
and Modular Units Program of the Public
Service Commission,

Complainant,

v.

Champion Home Builders, Inc.,

Respondent.

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Case No. MC-2016-0021

MOTION TO SCHEDULE A PREHEARING CONFERENCE

COMES NOW the Director of the Manufactured Housing and Modular Units Program of the Missouri Public Service Commission ("Director"), by and through the Office of Staff Counsel of the Missouri Public Service Commission ("Commission"), and on behalf of Champion Home Builders, Inc. ("Respondent"), and respectfully states as follows:

1. On July 30, 2015,¹ pursuant to his duly delegated authorities, the Director filed his *Complaint* against the Respondent, a regulated manufactured housing manufacturer, as defined in § 700.010(7), RSMo., alleging multiple violations of Commission rules and seeking statutory penalties defined in § 700.015, 700.045, and 700.100, RSMo.

2. On August 28, the Respondent filed its *Answer to Complaint and Demand for Formal Mediation*, asserting several affirmative defenses to the allegations made by the Director and a request for dispute resolution through the HUD Manufactured Home Dispute Resolution Program, pursuant to 24 C.F.R. § 3288.25.

¹ All events referenced herein occur in the year 2015.

3. On September 14, the Commission issued its *Order Setting Mediation* directing the parties to participate in a mediation session on October 2.

4. On October 2, the parties participated in a mediation session together, and with the purchaser of the manufactured home at issue. The purchaser and the Respondent were unable to reach mutually agreeable terms to address the “full listing” of alleged defects and deficiencies requested in the Respondent’s *Answer*, ¶ 34.

5. As the mediation has concluded, the Director intends to proceed with its *Complaint* on the issues enumerated therein, and requests a pre-hearing conference be scheduled so the parties may discuss the matters at issue and, if necessary, develop a procedural schedule for the complaint.

6. The Director and Respondent have found Tuesday, November 3, at 2 p.m. to be a mutually agreeable date and time for such proceeding.

WHEREFORE, the parties submit this request the Commission’s consideration and ask that a pre-hearing conference be scheduled.

Respectfully submitted,

/s/ Hampton Williams

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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 15th day of October, 2015.

/s/ Hampton Williams