

STATE OF MISSOURI
PUBLIC SERVICE COMMISSION

In the matter of)	
)	
USW Local 11-6,)	GC-2006-0390
)	
and)	
)	
Laclede Gas Company)	

MOTION TO SUBSTITE DEPOSITION FOR LIVE TESTIMONY

COMES NOW USW Local 11-6 ("Local 11-6"), by counsel, and hereby files its Motion to Substitute Deposition for Live Testimony. In support of this Motion, Local 11-6 states as follows:

1. Trial is set for the above-captioned matter on December 11-12, 2006.
2. Claire Donnelly provided an affidavit to Local 11-6 in the above-captioned matter.
3. However, Ms. Donnelly is unable to testify at the trial because in December she will be eight months pregnant and therefore unable to complete the drive to Jefferson City without undue hardship. Additionally, her husband will be out of town during the dates of the trial and therefore she needs to remain in St. Louis to watch her two year old child.
4. Ms. Donnelly is available for deposition anytime before November 17, 2006 and between December 1, 2006 and the date of the hearing.
5. Given the validity of Ms. Donnelly's reasons and that her deposition will provide an opportunity for cross-examination, no party will be prejudiced if this motion is granted.

WHEREFORE, Local 11-6 respectfully requests that the Commission grant its Motion for Leave to Substitute Deposition for Live Testimony.

Respectfully submitted,

/s/ Sherrie A. Schroder

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Certificate of Service

The undersigned certifies that a true and correct copy of the foregoing was served on November 13, 2006, by United States mail, hand-deliver, email, or facsimile upon:

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