

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

Lindenwood University,)	
)	
Complainant,)	
)	
v.)	File No. EC-2022-0159
)	
Union Electric Company d/b/a Ameren)	
Missouri,)	
)	
Respondent.)	

MOTION FOR EXTENSION OF TIME

Complainant Lindenwood University hereby requests a two-week extension of time to file its Opposition to Ameren Missouri’s Answer Affirmative Defenses and Motion to Dismiss. As grounds, Complainant states as follows:

1. Counsel for Complainant received the scheduling order setting time for responses to motion to dismiss on March 1, 2022.
2. Both of the undersigned counsel have been involved in expedited litigation in the Cole County Circuit Court in *Jefferson City Medical Group v. David Brummett*, Case No. 22AC-CC00028.
3. Since that date, depositions have occurred on March 1, 2, 3, 4, and 7. The case was set for a two-day trial on March 8 and 9. The trial has now continued to March 10 and 11.

4. In addition, undersigned counsel was heavily involved in expedited written discovery during the last two weeks of February. Undersigned counsel has also been required to prepare for trial over the weekend of March 5 and 6, and been in depositions and Court on the days set out above.

5. Mr. Pearson is scheduled to be out of State March 12 through 16. Mr. Harding is committed to depositions in a different case on March 14 through 16.

6. Due to these extraordinary circumstances, undersigned counsel respectfully requests an order extending the time for it to respond to Respondent's Affirmative Defenses and Motion to Dismiss to March 28, 2022. No other extension will be sought.

HUSCH BLACKWELL LLP

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ATTORNEYS FOR COMPLAINANT
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CERTIFICATE OF SERVICE

I certify that on March 11, 2022, I filed the foregoing document with the Commission's electronic filing system, which will serve a true and correct copy of the same to all counsel of record and also email to:

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