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Missouri Public Service Commission

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June 6, 2001

BRIAN D. KINKADE **Executive Director**

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ROBERT SCHALLENBERG Director, Utility Services

DONNA M. KOLILIS Director, Administration

DALE HARDY ROBERTS Secretary/Chief Regulatory Law Judge

> DANA K. JOYCE General Counsel

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JUN 0 6 2001

Missouri Public

Service Commission

Mr. Dale Hardy Roberts Secretary/Chief Regulatory Law Judge Missouri Public Service Commission P. O. Box 360 Jefferson City, MO 65102

RE: Case No. MC-2000-541

Dear Mr. Roberts:

Enclosed for filing in the above-captioned case are an original and eight (8) conformed copies of the MOTION FOR EXTENSION OF TIME.

This filing has been mailed or hand-delivered this date to all counsel of record.

Thank you for your attention to this matter.

Sincerely yours,

Bruce H. Bates

Associate General Counsel

(573) 751-7434

(573) 751-9285 (Fax)

BHB/lb **Enclosure**

cc: Counsel of Record

BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

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MOTION FOR EXTENSION OF TIME

COMES NOW the Director of the Division of Manufactured Homes, Recreational Vehicles, and Modular Units of the Public Service Commission ("Director" and "Commission") and for his *Motion for Extension of Time* states as follows:

- 1. On May 4, 2001, the Commission issued its *Order Changing Deadline for Filing of Procedural Schedule*, in which it directed the parties to file their procedural schedule in this matter no later than June 8, 2001.
- 2. The Director and Rightway Homes ("Respondent") are in the process of reaching a proposed settlement in this matter to submit to the Commission for its approval.

 Unfortunately, all of the persons necessary to consent to this proposal will not be available until Monday, June 11, 2001, as they are out of reach because of business. The Director and

Respondent fully expect to have a proposal to submit to the Commission within the next week, and no later than June 15, 2001.

- 3. Counsel for the Director has spoken with counsel for Respondent, as well as counsel for the Office of the Public Counsel, who have no objection to the granting of this motion.
- 4. 4 CSR 240-2.050(3) provides that "[w]hen an act is required or allowed to be done by order or rule of the commission at or within a specified time, the commission, at its discretion, may (A) Order the period enlarged before the expiration of the period originally prescribed or as extended by a previous order..."

WHEREFORE, the Director prays that the Commission grant his *Motion for Extension* of *Time*, pursuant to 4 CSR 240-2.050(3)(A), for the reasons set out above.

Respectfully submitted,

DANA K. JOYCE General Counsel

Bruce H. Bates

Associate General Counsel Missouri Bar No. 35442

Attorney for the Director of the Division of Manufactured Homes, Recreational Vehicles, and Modular Units of the Public Service Commission
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Certificate of Service

I hereby certify that copies of the foregoing have been mailed or hand-delivered to all counsel of record as shown on the attached service list this 6th day of June, 2001.

Bruce H. Bates

Service List for Case No. MC-2000-541 Revised: June 6, 2001 (lb)

Office of the Public Counsel P.O. Box 7800 Jefferson City, MO 65102

Doyle M. Murr P.O. Box 185 Salem, MO 65560 Robert K. Angstead Newman, Comley & Ruth P.O. Box 537 Jefferson City, MO 65102-0537

Jim Levin, Director Center For Dispute Resolution 206 Hulston Hall Columbia, MO 65211