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## Missouri Public Service Commission

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July 9, 2001

WESS A. HENDERSON Director, Utility Operations

ROBERT SCHALLENBERG Director, Utility Services

DONNA M. KOLILIS Director, Administration

DALE HARDY ROBERTS Secretary/Chief Regulatory Law Judge

> DANA K. JOYCE General Counsel

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-2000-660

FILED<sup>3</sup>
JUL 0 9 2001

Service Commission

Dear Mr. Roberts:

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

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

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BHB:ccl Enclosure

cc: Counsel of Record

BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

FILED<sup>3</sup>

Director of the Division of Manufactured	JUL 0 9 2001
Homes, Recreational Vehicles and Modular Units of the Public Service Commission,	Missouri Public Service Commission
Complainant,	) Case No. MC-2000-660
Discount Manufactured Housing, Inc.,	) )
Respondent.	<u>'</u>

## MOTION FOR EXTENSION OF TIME TO FILE SURREBUTTAL TESTIMONY

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 to File Surrebuttal Testimony states as follows:

- 1. On May 15, 2001, the Commission issued its *Order Establishing Procedural Schedule*, in which it directed the Director to file his Surrebuttal Testimony, if any, by July 10, 2001.
- 2. The Director has determined that he would like to file Surrebuttal Testimony to address certain points raised in Discount Manufactured Housing, Inc.'s ("Respondent") Rebuttal Testimony. However, due to the fact that Director's witness is located away from Jefferson City, there has been a difficulty in getting all of the persons responsible for preparing the Surrebuttal Testimony together in order to complete it. The Director would respectfully request an extension of one week, until July 17, 2001, in order to file his Surrebuttal Testimony.

- 3. Rule 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...."
- 4. Counsel for Director has spoken with counsel for Respondent and counsel for the Office of the Public Counsel, who have no objection to the granting of this motion.

**WHEREFORE**, the Director prays that the Commission grant his *Motion for Extension* of *Time to File Surrebuttal Testimony*, pursuant to Rule 4 CSR 240-2.050(3).

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

Missouri 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 9<sup>th</sup> day of July 2001.

Brus A. Bato

Service List for Case No. MC-2000-660 Revised: July 9, 2001 (ccl)

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

Larry J. Meyer, President C/0 Discount Manufactured Housing, Inc. 1601 North Outer Road East 50 Highway Warrensburg, MO 64093 Daniel R. Carter Fitzgerald, Fitzgerald & Carter 219 North Holden St. Warrensburg, MO 64093

Jim Levin, Director and Law Student Center for Dispute Resolution University of Missouri School of Law 206 Hulston Hall Columbia, MO 65211