

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

Derald Morgan, Rick and Cindy Graver,)
William and Gloria Phipps and David Lott,)
)
Complainants,)
)
v.)
)
Carl Richard Mills, Carriage Oaks Estates Homes)
Association, Distinctive Designs and Caring)
Americans Trust Foundation, Inc. (f/k/a Caring)
Americans Foundation, Inc.),)
)
Respondents.)

File No. WC-2017-0037

MOTION FOR EXTENSION

Comes now the Respondents by and through counsel, and for their Motion for Extension in these matters hereby state:

1. On August 14, 2016, the Complainant's filed their Complaint with the Missouri Public Service Commission ("Commission") requesting that the Commission return operations of a water and sewer system over to its home owner's association. On the same day, the Commission ordered the Respondents to file a response to the allegations no later than September 6, 2016 and directed the Missouri Public Service Commission Staff ("Staff") to investigate the Complaint and file a report no later than September 20, 2016.
2. On September 6, 2016 the Respondents filed their Response and Motion to Dismiss.
3. On September 16, 2016, the Staff filed for a Motion for Extension, seeking additional time to file its report. On the same day, the Commission granted the Staff's motion and directed the Staff to file a report no later than October 28, 2016.

4. On October 28, 2016, the Staff filed its Staff Report and Motion for Mediation suggesting that the Commission order the parties to partake in mediation to find an amicable solution to the issue of water and sewer ownership.

5. On October 31, 2016 the Commission ordered that parties submit responses to the Staff Report and Motion for Mediation no later than November 10, 2016.

6. Respondents are currently analyzing the Staff Report and reviewing alternatives for the ownership of the water and sewer systems suggested in the Staff Report. As such, the Respondents seek additional time to respond.

WHEREFORE, Respondents pray that the Commission will grant this request for an extension to file their response to the Staff Report and Motion for Mediation no later than December 16, 2016.

Respectfully submitted,

/s/ Bryan Wade

Bryan O. Wade, #41939

Whitney S. Smith #68405

Husch Blackwell LLP

901 St. Louis St., Suite 1800

Springfield, MO 65806

Office: (417) 268-4000

Fax No: (417) 268-4040

Bryan.wade@huschblackwell.com

Whitney.smith@huschblackwell.com

Attorneys for Respondents

Certificate of Service

I hereby certify that copies of the foregoing have been mailed or hand-delivered, transmitted by facsimile or electronically mailed to all counsel of record on this 2nd day of November, 2016.

/s/ Bryan Wade