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February 22, 2000

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

Re: Case No. MC2000-397

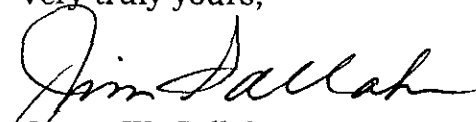
Dear Mr. Roberts:

Enclosed for filing in the above-captioned case are an original and fourteen (14) conformed copies of Respondent's **MOTION TO SUPPLEMENT ANSWER OR FILE ANSWER TO COMPLAINT OUT 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.

Very truly yours,


James W. Gallaher

JWG:bl

Enclosures

FILED²

FEB 22 2000

Missouri Public
Service Commission

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

FILED²

FEB 22 2000

Missouri Public
Service Commission

Director of the Department of
Manufactured Homes and Modular Units
of the Public Service Commission,

Complaint,

v.

Rock Road Trailer Parts and Sales, Inc.,

Respondent.

Case No. MC-2000-397

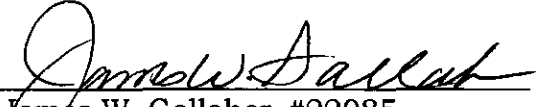
MOTION TO SUPPLEMENT ANSWER
OR TO FILE ANSWER OUT OF TIME

Comes now Respondent in the above styled case, by and through its attorney James W. Gallaher, and for its Motion states as follows:

1. On December 29, 1999, the Director filed a Complaint against Respondent. The Respondent received a copy of the Complaint. As of February 21, 2000, Respondent had not filed a formal Answer to the Complaint. However, Respondent answered the Complaint by filing documents dated January 12, 2000, and January 25, 2000 (Appendix 1 and Appendix 2). Respondent believed that these answers were a sufficient response to the Complaint filed in this case. The responses made reference to the P.S.C. case number. Respondent was not aware that it was necessary for the Answer to the Complaint to be filed by an attorney or that it should be done on a more formalized basis. The Respondent's action in filing the informal answers was made in good faith as its answer to the Complaint.

WHEREFORE, Respondent respectfully requests that the Commission grant it leave to supplement its answers or to file its answer to the Director's Complaint out of time.

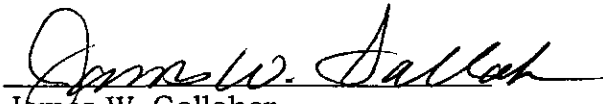
CARSON & COIL, P. C.


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Facsimile: (573) 636-7119

ATTORNEY FOR RESPONDENT

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true copy of the foregoing was mailed, postage prepaid, this 22nd day of February, 2000, to: David J. Stueven, Asst. General Counsel, MO Public Service Commission, P. O. Box 360, Jefferson City, MO 65102.


James W. Gallaher

1-12-00 -

To: Gene Winn

Missouri Public Service Commission

(FAX) 573-751-1847 Case MC-2000-397

From: Lloyd H Biggs

Rock Road Trailer

RE: Susan Accinino

(FAX) 314 739-5779
Phone 314 739-5775

1977 Redmond

To let you know what is going on, I have contacted Sparky's Mobile Home Service in Union, Mo. for him to set up estimate of repair to the above unit. I requested that he go out over the Holiday weekend and fix her frozen water lines and fix heat ducts so unit would not freeze up worse and he tried to do so, but she refused to let him do the work when he called her to set up a time to go out there.

I am waiting for the estimate from him to decide how to handle this, she just keeps adding more & more items to this list.

Gene, take a look at Burns Appraisals picture of unit on our lot and then

check complaint # 20 on list. See
a storm door on the unit, do you.
Who has these photos?
All above info is being sent to the
Attorney General's office also.

I would like to know if Bureau Approves
has extension & interior pictures
of this unit taken on Jan. 1, 1999
that was taken on our video lot.
We will try to contact them, I
would appreciate it if you would
also contact them for the pictures

Mr. Wrenner decided that he did not
have time to do the repairs to the unit.

Allocation sent to Attorney General's
office - Complaint No. CF-1999-09948
Kella Heidbrink

fax 573 751-7948
phone 573 751-4471



ROCK ROAD TRAILER
12725 ST. CHARLES ROCK RD.
BRIDGETON, MO. 63044

1-25-00

To: Gene Winn
Public Service Comm.

Case MC 2000-397

FAX 573-751-1847

To: Della Heidbrink

Jay Nixon, Attorney General

FAX 573-751-7948

Complaint CF 1999 09948

From: Kay D Biggs

FAX 314-739-5779

We have spoke to Sparky's Mobile Home Service, and we should have estimate on this unit by the 29th. At that time we will be able to make a better decision on how we will handle this situation. I have made contact by phone with Ms. Piccinino and told her this.