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December 20, 2000

**BRIAN D. KINKADE**  
Executive Director

**GORDON L. PERSINGER**  
Director, Research and Public Affairs

**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-2000-818**

**FILED**

**DEC 20 2000**

Missouri Public  
Service Commission

Dear Mr. Roberts:

Enclosed for filing in the above-captioned case are an original and eight (8) conformed copies of the **STAFF'S MOTION TO REOPEN CASE**.

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

FILED

DEC 20 2000

Missouri Public  
Service Commission

Director of the Division of Manufactured )  
Homes, Recreational Vehicles and )  
Modular Units of the Public Service )  
Commission, )

Complainant, )

v. )

Case No. MC-2000-818

Manufactured Housing Services of Bonne )  
Terre d/b/a Oakcreek Village of Bonne )  
Terre, )

Respondent. )

STAFF'S MOTION TO REOPEN CASE

COMES NOW the Director ("Director" or "Complainant") of the Division of Manufactured Homes, Recreational Vehicles and Modular Units of the Public Service Commission ("Commission") and for his *Motion to Reopen Case* respectfully states to the Commission as follows:

1. On June 14, 2000, the Complainant filed a *Complaint* against Respondent in this case, in which he requested that the Commission "[s]uspend the Dealer Registration of Oakcreek under the authority provided the Commission in section 700.100.3(4) until such time as the unauthorized alteration and the setup deficiencies are corrected, or a period of 30 days,

whichever is longer". On July 27, 2000, the Commission issued its *Order Finding Default*. On October 12, 2000, the Commission issued its *Second Order Finding Default*, in which it stated, "[t]hat the averments in the complaint filed on June 14, 2000, by the Director...are deemed admitted." (The previous default order had been set aside by the Commission on September 13, 2000, because Respondent had stated to the Commission that it had not realized the importance of failing to respond to the *Complaint*, and had not hired an attorney.)

2. On October 30, 2000, the Commission issued its *Notice Closing Case*. The Commission neither granted or denied the relief Staff requested in its *Complaint*, and therefore the issues raised by the *Complaint* have not yet been properly disposed of.

3. As of the date of the filing of this motion, all of the deficiencies have not been corrected and, therefore, unresolved problems still exist. Therefore, Complainant would pray that the Commission give Complainant the authority to suspend the Respondent's Dealer Registration for a period of 30 days past the date the corrections have been satisfactorily completed.

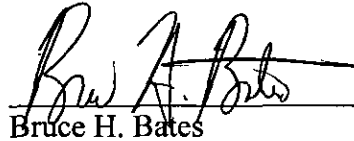
4. The Director again requests that the Commission suspend the Dealer Registration of Respondent under the authority provided it in Section 700.100.3(4) until such time as the deficiencies set out in the *Complaint* are corrected, or for a period of 30 days, whichever is longer.

5. The Director respectfully suggests to the Commission that it should reopen this case for the purpose of imposing sanctions upon Respondent.

WHEREFORE, the Director prays that the Commission grant his *Motion to Reopen Case*. The Director further prays that the Commission make whatever other orders and judgments appear to it to be just and proper in this cause.

Respectfully submitted,

DANA K. JOYCE  
General Counsel

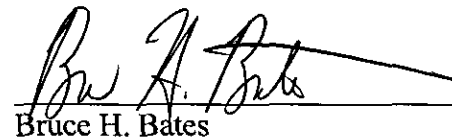


Bruce H. Bates  
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Missouri Bar No. 35442

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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 20th day of December 2000.



Bruce H. Bates

**Service List for  
Case No. MC-2000-818  
December 20, 2000 (lb)**

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Jefferson City, MO 65102**

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