

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

Jack and Stacey Woolever,	)	
	)	
Complainant,	)	
	)	
v.	)	<b><u>File No. WC-2021-0080</u></b>
	)	
Missouri-American Water Company,	)	
	)	
Respondent.	)	

**MOTION FOR EXTENSION OF TIME TO FILE RESPONSIVE PLEADING**

**COMES NOW** the Respondent Missouri-American Water Company (“Missouri-American”), by and through the undersigned counsel, and for its *Motion for Extension of Time to File Responsive Pleading* respectfully states to the Missouri Public Service Commission (“Commission”) as follows:

1. On October 20, 2020, the Commission received the formal Complaint submitted by Complainants against Missouri-American.
2. On November 20, 2020, the Commission issued its *Notice of Small Formal Complaint and Order Directing Staff to Investigate and File a Report* that, in part, directed Missouri-American to file an answer to the Complaint by December 20, 2020.
3. Rule 20 CSR 4240-2.070(8) provides that the Respondent shall answer a complaint within thirty (30) days unless otherwise ordered by the Commission.
4. The undersigned counsel asserts that good cause exists to extend the deadline for filing a responsive pleading because counsel with primary responsibility for this matter tested positive for Covid-19, along with much of her family, experienced symptoms, and was out of the office and quarantined with her family from November 6, 2020, through November 30, 2020,

and much of the first week of December 2020. Due to her own illness, illness of necessary client witnesses, as well as the press of other business, the undersigned counsel has not been able to fully discuss this matter with the client.

5. The undersigned seeks a ten (10) day extension, until December 30, 2020, to file a responsive pleading in this matter.

**WHEREFORE**, Missouri-American requests the Commission grant it until December 30, 2020, to file a responsive pleading in this matter for good cause shown.

Respectfully submitted,

**BRYDON, SWEARENGEN & ENGLAND, P.C.**

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**MISSOURI-AMERICAN WATER COMPANY**

/s/ Timothy Luft  
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**ATTORNEYS FOR MISSOURI AMERICAN  
WATER COMPANY**

**CERTIFICATE OF SERVICE**

The undersigned certifies that a true and correct copy of the foregoing document was sent by electronic mail to all parties of record, in addition to a hard copy sent by U.S. Postal Mail, postage prepaid, to Complainant's address on file with the Commission, this 20<sup>th</sup> day of December 2020.

**/s/ Jennifer L. Hernandez**