

5. The Carriage Oaks Not-for-Profit believes that the deficiencies identified can be corrected to the satisfaction of Staff and is working with the interested parties to correct any deficiencies.

6. Currently, counsel for the Carriage Oaks Not-for-Profit has prior commitments during the months of April and May, including but not limited to appellate briefing deadlines, multiple depositions, multiple trials, as well as the everyday time constraints from cases that are in active litigation.

7. Additionally, this case is currently the reason that Case No. 2021-0223 with the Public Service Commission has been extended as it is anticipated that the completion of this case, WM-2022-0144, will resolve many of the disputes identified in Case No. 2021-0223.

8. Further, two (2) civil actions are pending in the Circuit Court of Stone County, Missouri, Case Nos. 19SN-CC00077 and 20SN-00155. Counsel anticipates that the majority of the disputes in these cases between the parties will be resolved pending the completion of this case, WM-2022-0144.

9. Finally, the Carriage Oaks Not-for-Profit is attempting to obtain a legal survey for the water utility asset, which is taking longer than anticipated.

WHEREFORE, the Carriage Oaks Not-for-Profit respectfully requests that the Commission temporarily suspend procedural deadlines, including but not limited to the deadline for Staff Recommendation, to allow the parties to time to correct deficiencies identified by Staff, or in the alternative, extend the time for Staff Recommendation an additional 90 days due to the reasons outlined above.

Respectfully Submitted,

SCHENEWERK & WILLIAMS,
ATTORNEYS AT LAW, LLC

/s/ Laura Stringfellow

Laura Stringfellow, Mo. Bar No. 71196

100 Prairie Dunes Dr., Suite 200

Branson, Missouri 65616

Phone: 417-334-7922

Fax: 417-334-7923

laura@sfalawfirm.com

Counsel for the Carriage Oaks Estates Not-for-Profit

CERTIFICATE OF SERVICE

The below signed counsel hereby certifies that a true and accurate copy of the foregoing was submitted through the Missouri Public Service Commission's E-Filing System on April 8, 2022, which generates notices to interested parties.

/s/ Laura Stringfellow

Laura Stringfellow