

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

**Director of the Manufactured Housing
and Modular Units Program of the
Public Service Commission,**

)
)
)

Complainant,

)
)
)

v.

Case No. MC-2004-0079

Amega Sales, Inc.,

)
)
)

Respondent.

)

RESPONDENT'S MOTION FOR CONTINUANCE

COMES NOW Respondent Amega Sales, Inc., by and through its undersigned attorneys, and for its Motion for Continuance in this cause states the following:

1. On March 16, 2004, the undersigned was informed that this matter has been scheduled for evidentiary hearing before the Commission on March 31 and April 1, 2004, beginning at 8:30 a.m. each day.

2. A mediation in this was held in November of 2003. Since that mediation occurred, the undersigned and counsel for the Complainant have been negotiating on and working on a settlement stipulation in this cause.

3. On or about March 5, 2004, the Respondent signed what the undersigned believed had been agreed to settlement stipulations, and those settlement stipulations were forwarded to counsel for Complainant.

4. On March 16, 2004, the undersigned was informed by counsel for the Complainant that the Complainant had additional changes it wanted made on the settlement stipulations. Those requested changes are currently under consideration and review by Respondent and Respondent's counsel.

5. Because the parties believed that they had settled the disputed issues in the case and because they believed they would enter into settlement stipulations, no discovery in this cause has taken place. Therefore, the undersigned is not prepared to try this case due to lack of discovery.

6. In addition, the undersigned is involved in a complex closing involving real property in the Chicago, Illinois area, which transaction is scheduled to close on March 31, 2004 and will require the complete and full attention of the undersigned on March 31, 2004.

7. It is not practical for the parties to complete discovery between now and March 31, 2004.

WHEREFORE, the undersigned respectfully requests that the Commission continue and reschedule the evidentiary hearing in this cause to a date not earlier than April 29, 2004, in order to accommodate the schedule of the undersigned and to allow the parties to undertake and complete discovery, and the undersigned respectfully requests such other and further relief as the Commission deems just and proper.

/s/ Thomas M. Harrison

Thomas M. Harrison
Van Matre and Harrison, P.C.
1103 East Broadway, Suite 101
P. O. Box 1017
Columbia, Missouri 65205
(573) 874-7777
Missouri Bar Number 36617
Attorney for Amega Sales, Inc.

The undersigned certifies that a complete and conformed copy of the foregoing document was mailed to each attorney who represents any party to the foregoing action, by U.S. Mail, postage prepaid in the proper amount, at said attorney's business address.

/s/ Thomas M. Harrison

Dated: March 16, 2004