

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

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

Complainant,

v.

CASE NO. MC-2006-0389

Blakely Manufactures Homes

Respondent.

MOTION REQUESTING FULL 30 DAYS TO FILE ANSWER

Comes now, Blakely Manufactured Homes, by and through counsel, Sue Crane,
and for his Motion states as follows:

- 1) Commission Rule 4 CSR 240-2.070(7) provides that, unless otherwise ordered by the Commission, a complaint must be answered by Respondent within 30 days.
- 2) The Staff has requested that rule 4 CSR 240-2.080 (16) be granted, wherein Respondent would have 15 days to file an answer and on Order was entered sustaining this request prior to counsel for Blakely being retained.
- 3) Counsel for Blakely has conferred with Staff Counsel for the Public Service Commission who is not opposed to Respondent's request for full 30 days to answer.
- 4) Blakely states as part of this request, he has voluntarily shut down sales of any further manufactured homes and will relinquish his license, upon request.

WHEREFORE, Counsel and Respondent request that the Commission grant Respondent 30 days to file his answer and issue other findings and orders as are just and reasonable.

BRADY & CRANE, L.L.C.

s/ Sue Crane
Sue Crane MBE36593
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Attorney for Respondent

Proof of Service:

The undersigned certifies that a complete and accurate copy of this instrument was mailed to the person listed below on this 24th day of April, 2006.

s/ Sue Crane

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