BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

Director of the Manufactured Housing and Modular Units Program of the Public)	
Service Commission,)	
Complainant,)))	Case No: MC-2011-0319
vs.)	
)	
Burkhart Mobile Homes, Inc.,)	
)	
Respondent.)	

RESPONDENT'S RESPONSE IN OPPOSITION TO DIRECTOR'S MOTION FOR AND SUGGESTIONS IN SUPPORT OF HIS MOTION FOR SUMMARY DETERMINATION

COMES NOW Respondent Burkhart Mobile Homes, Inc. and for its Response in Opposition to Director's Motion for and Suggestions in Support of His Motion for Summary Determination pursuant to Rule CSR 240-2.117(1)(C) states as follows:

- 1. Respondent admits the factual statement of paragraph 1.
- 2. Respondent admits the factual statement of paragraph 2.
- 3. Respondent admits the factual statement of paragraph 3.
- 4. Respondent admits the factual statement of paragraph 4.
- 5. Respondent admits the factual statement of paragraph 5.
- 6. Respondent admits the factual statement of paragraph 6.
- 7. Respondent admits the factual statement of paragraph 7.
- 8. Respondent admits the factual statement of paragraph 8.
- 9. Respondent admits the factual statement of paragraph 9.
- 10. Respondent admits the factual statement of paragraph 10.
- 11. Respondent admits the factual statement of paragraph 11.

- 12. Respondent admits the factual statement of paragraph 12.
- 13. Respondent admits the factual statement of paragraph 13.
- 14. Respondent admits the factual statement of paragraph 14.
- 15. Respondent admits the factual statement of paragraph 15.
- 16. Respondent admits the factual statement of paragraph 16.
- 17. Respondent admits the factual statement of paragraph 17.
- 18. Respondent admits the factual statement of paragraph 18.
- 19. Respondent admits the factual statement of paragraph 19.
- 20. Respondent admits the factual statement of paragraph 20.
- 21. Respondent admits the factual statement of paragraph 21.
- 22. Respondent admits the factual statement of paragraph 22.
- 23. Respondent admits the factual statement of paragraph 23.
- 24. Respondent admits the factual statement of paragraph 24.
- 25. Respondent admits the factual statement of paragraph 25.
- 26. Respondent admits the factual statement of paragraph 26.
- 27. Respondent admits the factual statement of paragraph 27.
- 28. Respondent admits the factual statement of paragraph 28.
- 29. Respondent admits the factual statement of paragraph 29.
- 30. Respondent admits the factual statement of paragraph 30.
- 31. Respondent admits the factual statement of paragraph 31.

WHEREFORE, Respondent Burkhart Mobile Homes, Inc. prays the Commission deny Director's Motion for Summary Determination and grant such other and further relief as the Commission deems just.

Respectfully submitted,

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ATTORNEYS FOR RESPONDENT BURKHART MOBILE HOMES, INC.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served electronically on this 1st day of December, 2011, on the parties of record.