

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

GERALD & JOANNE REIERSON)	
Complainants)	
)	
vs.)	Case # SC-2005-0083
)	
KENNETH JAEGER & BLUE)	
LAGOON SEWER CORPORATION)	
Respondents)	

RESPONDENT’S REPLY TO STAFF’S OBJECTION TO RESPONDENT’S MOTION FOR
CONTINUANCE

COMES NOW, Respondents, by and through their attorney James F. Lemon, of LEMON and MORROW, LLC and moving for a continuance state as follows:

That Staff notes that Respondents have not filed any of the pleadings in the Case filed in Ralls County Missouri. Respondents note that Staff has not requested such information be filed, nor ever implied in any previous conversation with counsel for Respondents that there was any doubt as to the matters filed in Ralls County Missouri. Respondent’s counsel affirmatively states the he stands ready to file any and all pleadings in that matter with the PSC in the event that there is some doubt as to whether he has misled the PSC or given some false information regarding the matters filed and under consideration by the Ralls County Court.

Respondent’s counsel also notes that he has personally discussed the matter with Keith Krueger of the PSC, and that from his conversations with Mr. Krueger it was certainly implied that the PSC was aware of exactly what was under consideration there. Further, Harry Bazoin, Assistant Missouri Attorney General, personally told Respondent’s Counsel that he had been in contact with the PSC counsel, and had made them aware of the matters pending in the Ralls County Circuit court, and specifically the issues regarding transfer to the Cannon Water Supply

District.

Notwithstanding any of the foregoing, Respondents note that whether Staff is aware of the matters filed in Ralls County Circuit Court or not, the matters filed and under consideration there are still the matters which are under consideration. Further, they still constitute possible violations of Respondents due process and double jeopardy rights if the matters under consideration are taken up by the PSC.

Respectfully submitted,

LEMON AND MORROW, LLC

/James F. Lemon/

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ATTORNEY FOR RESPONDENT

CERTIFICATE OF SERVICE

I, James F. Lemon, attorney for the Defendant, do hereby certify that a true copy of the above and foregoing MOTION was served upon all parties of record via email, mail or hand delivery this 14TH day of April, 2007.

/James F. Lemon/

James F. Lemon