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MARK S. RUBIN

January 26, 1999

FILED

JAN 26 1999

**VIA TELEFAX & FEDERAL EXPRESS**

Mr. Dale Hardy Roberts  
Secretary/Chief Regulatory Law Judge  
Missouri Public Service Commission  
Truman Building  
301 W. High Street, Room 530  
Jefferson City, Missouri 65101

Missouri Public  
Service Commission

Re: Staff of the Public Service Commission vs. Imperial Utility Corporation, Case No. SC-99-134 and Staff of the Public Service Commission vs. House Springs Sewer Company, Inc., Case No. SC-99-135 - Request for an Order Staying the Filing of a Procedural Schedule

Dear Mr. Roberts:

Enclosed for filing with the Commission, please find an original and fourteen (14) copies of a Request for an Order Staying the Filing of a Procedural Schedule in each of the above referenced matters.

This morning, I received a call from David Steuven of the Office of the General Counsel advising me that I was supposed to be at a scheduling conference before Judge Hopkins, today. I checked my file and did not find a copy of a notice regarding the conference. As a result, I did not have it on my calendar.

Please see that Judge Hopkins receives a copy of this cover letter. I apologize for any inconvenience that the Judge may have experienced as a result of my failure to appear.

I have discussed both matters with Mr. Stueven. We anticipate that the sale of Imperial will happen within the next few weeks. We have asked for a stay of the filing of a procedural schedule, since the assessments will be paid from the sale proceeds.

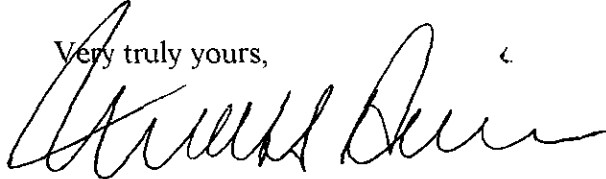
With regard to House Springs, we are working on a definitive asset sale and purchase agreement with a prospective purchaser, who is quite anxious to move swiftly. We have asked for

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a similar stay in the House Springs case.

Thank you for your courtesy and cooperation.

Very truly yours,

A handwritten signature in black ink, appearing to read "Mark S. Rubin", written in a cursive style.

Mark S. Rubin

MSR:dce  
Enclosures

cc: Office of Public Counsel  
Office of General Counsel

BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI

FILED

JAN 26 1999

Missouri Public  
Service Commission

Staff of the Missouri Public Service Commission	)	
	)	
Complainant,	)	Case No. SC-99-135
	)	
vs.	)	
	)	
House Springs Sewer Company, Inc.	)	
	)	
Respondent.	)	

REQUEST OF RESPONDENT TO A STAY  
FOR FILING OF THE PROCEDURAL SCHEDULE

COMES NOW, House Springs Sewer Company, Inc., by and through counsel, and for its Request for a Stay for Filing of the Procedural Schedule, states as follows:

1. House Springs Sewer Company, Inc. ("House Springs") has received a letter of intent from a prospective Purchaser of all or substantially all of its assets.
2. The parties are negotiating the terms of a definitive Asset Sale and Purchase Agreement at this time.
3. The prospective Purchaser has indicated a desire to move quickly toward finalizing a definitive Agreement and to consummate the acquisition by the prospective Purchaser of substantially all of the assets of House Springs.
4. As previously stated in House Springs' Answer to the Complaint in this Case, after a contract by and between House Springs and the prospective Purchaser has been executed and approval of the sale by the Public Service Commission has been received, the aggregate balance of all of the unpaid assessments due the Public Service Commission will be paid from the closing proceeds.
5. House Springs anticipates that a definitive contract can be negotiated and an Application for Approval of the Sale filed with the Public Service Commission within sixty (60) days

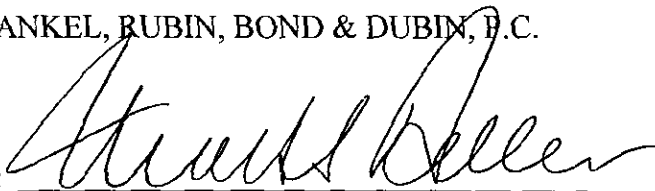
and payment tendered upon the receipt of approval of the sale by the Public Service Commission.

WHEREFORE, House Springs prays that the Public Service Commission enter its Order staying the filing of a Procedural Schedule in this case for a period of ninety (90) days from the date hereof, January 26, 1999, to and including April 26, 1999; and for such other and further Orders as the Commission deems necessary under the circumstances.

Respectfully submitted,

FRANKEL, RUBIN, BOND & DUBIN, P.C.

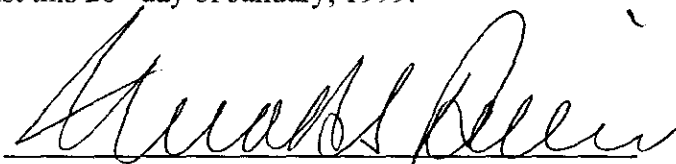
By:



Mark S. Rubin, MBE 25859  
Attorney for Respondent  
231 S. Bemiston, Suite 1111  
Clayton, Missouri 63105  
(314) 725-8000  
(314) 726-5837 fax

**CERTIFICATE OF SERVICE**

I hereby certify that true copies of the foregoing document have been faxed or mailed to all counsel of record as shown on the Service List this 26<sup>th</sup> day of January, 1999.



**Service List for Case No. SC-99-135**

Office of the Public Counsel  
301 East High Street  
P.O. Box 7800  
Jefferson City, MO 65102  
facsimile: (573) 751-5562

Office of the General Counsel  
Public Service Commission  
P.O. Box 360  
Jefferson City, MO 65102  
facsimile: (573) 751-9285