Caldwell & Singleton, LLC

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Of Counsel: Freeman R. Bosley, Jr. LaRee M. DeFreece Daniel T. Friedson

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*Also Licensed in Illinois
**Also Licensed in Virginia
† Licensed in Illinois and Mississippi
†† Also a Registered Nurse

December 10, 2001

Mr. Dale Hardy Roberts Secretary/Chief Regulatory Law Judge Missouri Public Service Commission 200 Madison Street, Suite 100 Jefferson City, MO 65101 FILED³
DEC 1 3 2001

Missouri Public Service Cemmission

Re: MPSC Case No. EC-2002-112; Sterling Moody, et al., v. Ameren UE, et al.

Sincere

Dear Mr. Roberts:

Enclosed for filing on behalf of Complainants Sterling Moody and Sterling's Market Place in the above-mentioned action, please find an original and (8) copies of Complainants' Request to File Response to Staff's Report Out of Time.

Please acknowledge receipt of this request as soon as possible.

FRB/krt Enclosures Freeman R. Bosley, Jr.



Missouri D. . .

BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

| Sterling Moody, Sterling's Market Place, And Sterling's Place, I | Service Commission) |
|---|-------------------------|
| Complainants, |) Case No.: EC 2002-112 |
| v. |) |
| AmerenUE, Union Electric Co. d/b/a AmerenUE; and Mike Foy, Leroy Ettling, And Sherry Moshner, as employees of |))) |
| AmerenUE, |) |
| Respondents. |) |

COMPLAINANTS' REQUEST TO FILE RESPONSE
TO STAFF'S REPORT OUT OF TIME

Come now Complainants and in support of their request to file response to Staff's report out of time, state the following:

- 1. That Complainants received Staff's Report on December 3, 2001.
- 2. Complainant Sterling Moody was out of town on business and did not return until December 5, 2001.
- 3. Complainant Sterling Moody has only recently had an opportunity to confer with legal counsel regarding Staff's report and due to the nature of Staff's findings, needs until December 14, 2001 to file his response.

WHEREFORE, Complainants respectfully request that they be given until 4:00 p.m. on December 14, 2001 to file their response to Staff's findings.

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Respectfully submitted,

CALDWELL & SINGLETON, LLC

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Attorneys for Complainants Sterling Moody, Sterling's Market Place And Sterling's Market Place, I

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing was served via U.S. first class mail on this 10th day of December, 2001 to all parties of record listed below.

CASE NO. EC-2002-112

Office of the Public Counsel P. O. Box 78 Jefferson City, MO 65102

James J. Cook AmerenUE 1901 Chouteau Avenue P. O. Box 66149 St. Louis, MO 63166-6149 General Counsel Missouri Public Service Commission P. O. Box 360 Jefferson City, MO 65102

Freeman R. Bosley, Jr.