

SUBPOENA DUCES TECUM
Order to Appear for Deposition and
Order to Produce Documents



THE STATE OF MISSOURI: To Thomas M. Harrison, Registered Agent, A&G Commercial Trucking, Inc.

Serve at: 1103 EAST BROADWAY, STE.101 COLUMBIA MO 65201.

You are hereby commanded, pursuant to §§386.440, 393.140 (9) and (10), 4 CSR 240-2.100, and Supreme Court Rule 57.03 (4), to be and appear personally before the Public Service Commission of the State of Missouri on the **18th** day of **December** A.D., **2007**, at **10:00 a.m.** of that day, at Governor's Office Building, 8th Floor, Room 810, 200 Madison Street, Jefferson City, in the County of Cole, in the State of Missouri, to testify at deposition in the matter of Director of the Manufactured Housing and Modular Units Program of the Missouri Public Service Commission v. Amega Sales, Inc. d/b/a Quality Preowned Homes, Columbia Discount Homes, Mark Twain Mobile Home Sales, and Chateau Homes, in Case No. MC-2008-0071, on behalf of the Staff of the Missouri Public Service Commission;

You are further commanded to produce at the General Counsel's Office, Missouri Public Service Commission, 200 Madison Street, P.O. Box 360, Jefferson City, MO 65102, on or before December 14, 2007 the following documents and records of A&G Commercial Trucking, Inc., relating to MC-2008-0071, and the following manufactured homes:

Serial #

Manufacturer

DESAL1101AB
CS2008473TNAB
CHO002302KYAB

Southern
Clayton
Clayton

- a) All documents or copies of documents in your possession or control relating to or regarding the manufactured home including contracts, bills of lading, invoices, certificates of title, notes, memoranda, from any source;
- b) All documents pertaining to the permitted route of transportation for each home, including, but not limited to route plans, documents pertaining to travel authorizations, oversize load permits, maps, and driver contracts;
- c) Any and all documents relating to any deviations from any planned or permitted route;
- d) Any and all documents relating to any contact, whether intentional or unintentional, between each home and any other unit, vehicle, tow vehicle, machinery, or other object, including, but not limited to, such instances which resulted in or contributed to any change in the condition of the home;
- e) All documents, including, but not limited to, any and all sales or purchase agreements, invoices, bills of lading, contracts, memos, notes, records or any other document relating to the transportation or delivery of each home;
- f) Any and all documents of insurance, including but not limited to proof of insurance, relating to or regarding each home;
- g) Any and all applications for insurance relating to or regarding each home;
- h) Any and all documents relating to insurance claims relating to or regarding each home;
- i) Any and all traffic tickets, citations, warrants, or other documents relating to any accident or moving vehicle violation relating to or regarding each home or its tow vehicle;

- j) Any and all contracts, invoices, bills of lading, notes, memoranda or other documents involving any manufactured home dealer in any state for each home;
- k) A list of all employees of A&G Commercial Trucking, Inc. whose duties include driving vehicles or flagging to pick up or transport manufactured homes since January 1, 2005;
- l) A list of all contractors of A&G Commercial Trucking, Inc. whose duties include driving vehicles or flagging to pick up or transport of manufactured homes since January 1, 2005;
- m) A list of all employees or contract drivers or contract driver companies of A&G Commercial Trucking, Inc. whose principal workplace or office is in Missouri.
- n) Any and all documents relating to actions taken to reprimand or otherwise discipline drivers, whether employees or contract, who deviate from designated routes while transporting manufactured homes;
- o) Any and all documents relating to actions taken to reprimand or otherwise discipline drivers, whether employees or contract, who are involved in moving violations or motor vehicle accidents while transporting manufactured homes;
- p) Any and all contracts invoices, bills of lading, notes, memoranda or other documents involving Amega Sales, Inc. or GKD Management, L.P., in which the subject matter was, or was related to, any or all of the specified manufactured homes.

If you wish to avoid making an appearance you may produce the requested documents, certified as to authenticity with business record affidavit BEFORE the date of the deposition, to Steven C. Reed, General Counsel's Office, Missouri Public Service Commission, 200 Madison St., P.O. Box 360, Jefferson City, MO 65102. Hereof fail not at your peril. Upon receipt of all documents requested, prior to 5:00 pm, December 14, 2007, your appearance will NOT be

required. The person or officer serving this writ is commanded to have the same at the time and place aforesaid, certifying thereon its return.

Under Rule 57.03(b)(4) A&G Commercial Trucking, Inc. has a duty to designate the person or persons who will testify to these matters.

Given under my hand, this 19th day of November A.D. 2007.

Morris L. Woodruff

Morris L. Woodruff,

Deputy Chief Regulatory Law Judge

Public Service Commission of the State of
Missouri

RETURN

I HEREBY CERTIFY, that I have served the within writ by reading the same in the presence and hearing of the within named Thomas Harrison on the 20th day of November, 2007, in Boone County, in the State of Missouri.

Jeff R. Auer
[Name]

Process Server
[Title]