

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

The Staff of the Missouri Public Service Commission,)	
)	
Complainant)	
v.)	
)	Case No. SC-2009-0304
Rodney Glenn Construction, Inc.; RDG Development L.L.C.; and Rodney Glenn, a natural person)	
Respondents)	

MOTION TO EXPAND TIME TO ANSWER

COMES NOW respondent herein, by and through the undersigned counsel as registered agent for Rodney Glenn Construction, Inc. and RDG Development, LLC and as attorney for Rodney Glenn individually in general law and requests the time within which to file an answer be expanded for thirty (30) days and in support thereof states as follows:

1. The undersigned counsel is the registered agent for the defendant herein.
2. The undersigned counsel has no specific knowledge regarding these matters and merely serves as registered agent for service purposes.
3. Defendant will require additional time with which to retain counsel for representation in this matter.
4. Defendant has spoken with legal counsel for the Missouri Public Service Commission and she has not stated a position as to her consent.

WHEREFORE, it is requested to expand the time within which to answer by 30 days.

Mick Wilson #46393
305 West Broadway
Ashland, Missouri 65010-9787
573-657-4171
FAX: 573-657-4214
Attorney for Defendant