NEWMAN, COMLEY & RUTH

PROFESSIONAL CORPORATION
ATTORNEYS AND COUNSELORS AT LAW
MONROE BLUFF EXECUTIVE CENTER
601 MONROE STREET, SUITE 301
P.O. BOX 537
JEFFERSON CITY, MISSOURI 65102-0537

EUITE 301 FACSIMILE: (573) 636-3306

ROBERT K. ANGSTEAD ROBERT J. BRUNDAGE MARK W. COMLEY CATHLEEN A. MARTIN STEPHEN G. NEWMAN JOHN A. RUTH

www.ncrpc.com
June 17, 2004

The Honorable Dale Hardy Roberts Secretary/Chief Regulatory Law Judge Missouri Public Service Commission P.O. Box 360 Jefferson City, MO 65102-0360 FILED

TELEPHONE: (573) 634-2266

Service Commission

Re:

Secured Technologies, L.C. Case No. TC-2004-0310

Dear Judge Roberts:

Please find enclosed for filing in the referenced matter the original and five copies of Motion to Reschedule Hearing.

Please contact me if you have any questions regarding this filing. Thank you.

Very truly yours,

NEWMAN, COMLEY & RUTH P.C.

By:

comleym@ncrpc.com

MWC:ab Enclosure

cc: Office of Public Counsel

Bob Berlin

Mark S. Michael

BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI



The Staff of the Missouri Public Service Commission,) Selfica Senting
Complainant,)
) Case No. TC-2004-0310
v.)
)
Secured Technologies, L.C.)
)
Respondent.)

MOTION TO RESCHEDULE HEARING

Comes now Secured Technologies, L.C., Respondent, by and through its attorneys, and respectfully states the following to the Commission:

- 1. By its order of May 6, 2004, the Commission scheduled the hearing in this matter for June 11, 2004, but in observance of the National Day of Mourning for President Ronald W. Reagan, the Commission, by order of June 8, 2004, rescheduled the hearing to July 8, 2004.
- 2. Respondent's witnesses have tried diligently to reschedule items on their calendars that conflict with the newly set July 8, 2004 hearing date. However, Mr. Jerry Jacobs, one of Respondent's principle witnesses, will be unavailable for hearing on July 8, 2004.
- 3. Due Mr. Jacobs' conflict on July 8, Respondent respectfully requests that the Commission set aside the July 8 hearing date and reschedule hearing.
- 4. Counsel for the Staff has been advised of the Mr. Jacobs' conflict and has no objection to rescheduling the hearing.
- 5. Respondent proposes either July 22 or 23, 2004, dates which are provisionally open on the Commission's calendar, as times for the hearing. Counsel for the Staff has confirmed that

WHEREFORE, based upon the above and foregoing, Respondent respectfully requests that the Commission reschedule the hearing in this matter for either July 22 or July 23, 2004.

Respectfully submitted,

NEWMAN, COMLEY & RUTH P.C.

Mark W. Comley

601 Monroe Street, Suite 301

P.O. Box 537

Jefferson City, MO 65102-0537

(573) 634-2266

(573) 636-3306 FAX

Attorneys for Respondent

Certificate of Service

I hereby certify that a true and correct copy of the above and foregoing document was sent by U.S. Mail, postage prepaid, to bob.berlin@psc.mo.gov, and Office of Public Counsel at opcservice@ded.state.mo.us, on this 16th day of June, 2004.