

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

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

STAFF’S MOTION TO STAY THE IMPOSITION OF A DEFAULT ORDER

COMES NOW the Staff of the Missouri Public Service Commission (“Staff”), by and through Counsel, and for its Motion states:

1. On February 25, 2009, the Staff of the Missouri Public Service Commission filed a complaint with the Missouri Public Service Commission (“Commission”) against Rodney Glenn Construction, Inc., RDG Development, LLC and Rodney Glenn (collectively, “Respondents”). The Commission then issued notice of the complaint to the Respondents. Because it was unclear whether Respondents received notice, the Commission issued a second notice of the complaint on April 28, 2009. The notice required Respondents to file an answer no later than May 28, 2009.

2. In light of recent and continuing discussions between Glenn and Staff which may ultimately lead to the resolution of the violations alleged in Staff’s Complaint, Staff respectfully requests that the Commission defer entering an Order of Default in this matter indefinitely.

3. Staff has contacted the Office of the Public Counsel, which did not indicate opposition to this request.

4. Staff does not believe that any party will be harmed by the granting of its Motion to Stay the Imposition of a Default Order, nor does Staff make its request so as to unduly delay these proceedings.

WHEREFORE, Staff requests that the Commission defer entering an Order of Default at this time.

Respectfully submitted,

/s/ Sarah Kliethermes

Sarah L. Kliethermes

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted by facsimile or electronically mailed to all counsel of record this 31st day of July, 2009.

/s/ Sarah Kliethermes