

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

DERALD MORGAN, RICK AND CINDY)
GRAVER, WILLIAM AND GLORIA PHIPPS,)
and DAVID LOTT,)

Complainants,)

v.)

File No. WC-2017-0037

CARL RICHARD MILLS,)
CARRIAGE OAKS ESTATES,)
DISTINCTIVE DESIGNS, and)
CARING AMERICANS TRUST)
FOUNDATION, INC. (f/k/a Caring)
Americans Foundation, Inc.))

Respondents.)

**SUGGESTIONS IN OPPOSITION TO
RESPONDENTS' MOTION FOR EXTENSION**

COME NOW, Complainants Derald Morgan, Rick and Cindy Graver, William and Gloria Phipps, and David Lott ("Complainants") and state the following in opposition to Respondents' Motion for Extension:

1. On September 21, 2017, Complainants served discovery requests to Respondents.
2. On October 19, 2017, Respondents filed a Motion for Extension, requesting an additional month in order to respond to Complainants' discovery requests.
3. There is currently a scheduling order in place in this case that makes October 31, 2017, the last day to request discovery.
4. Respondents' answers and responses to Complainants' discovery requests may result in Complainants needing to conduct follow-up discovery. If Respondents are granted leave to respond, Complainants will be prejudiced in that they will be barred from conducting follow-

up discovery since the deadline for requesting discovery must be completed by October 31, 2017.

WHEREFORE, Complaints request that the Commission deny Respondents' Motion for Extension, or alternatively, extend the timeframe for requesting discovery by the same number of days by which Respondents' deadline is extended.

Respectfully submitted,

SCHENEWERK & FINKENBINDER,
ATTORNEYS AT LAW, LLC

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COUNSEL FOR COMPLAINANTS

CERTIFICATE OF SERVICE

The below signed counsel hereby certifies that a true and accurate copy of the foregoing was sent to all counsel of record via email on October 23, 2017, to the following email addresses:

Bryan Wade [bryan.wade@huschblackwell.com]; Ryan Smith [ryan.smith@ded.mo.gov]; Whitney Smith [whitney.smith@huschblackwell.com]; and Jacob Westen [Jacob.westen@psc.mo.gov]

/s/ Karl Finkenbinder
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