

The Staff of the Missouri Public Service Commission,

Complainant,

V.

Birch Telecom of Missouri, LLC.,  
d/b/a  
Birch Communications, LLC.,

Respondent

**Case No. TC-2019-0136**

**MOTION TO AMEND COMPLAINT**

**COMES NOW** the Staff of the Missouri Public Service Commission (“Staff”), and  
for its *Motion to Amend Complaint* states as follows:

1. Staff filed its *Complaint* in the above-captioned matter on November 13, 2018.
2. On December 5, 2018, Staff discovered that the *Complaint* had been improperly served.
3. Staff wishes to amend Paragraphs 3 and 4 from the *Complaint* to correct this error.
4. Paragraph 3 of the *Complaint* should read as follows:  
  
“Respondent Company’s registered address with the Secretary of State is 3225 – A Emerald Lane, Jefferson City, MO 65101. Respondent’s official representative, as listed in EFIS, is Sharyl Fowler, 115 Gateway Dr., Macon, GA, 31210. The Company provides telecommunications services statewide.”

5. Paragraph 4 of the *Complaint* should read as follows:

“Respondent Registered Agents Solutions, Inc., on information and belief is the registered agent of Respondent Company.”

6. As these changes would not introduce new topics to the *Complaint*, the amending of the *Complaint* will cause no party any undue prejudice.

**WHEREFORE**, the Staff prays that the Commission will duly amend the original *Complaint* filed on November 13, 2018.

Respectfully submitted,

**/s/ Travis J. Pringle**

Missouri Bar No. 71128

Legal Counsel

Attorney for the Staff of the

Public Service Commission

P. O. Box 360

Jefferson City, MO 65102

(573) 751-4140 (Telephone)

(573) 751-9265 (Fax)

[Travis.Pringle@psc.mo.gov](mailto:Travis.Pringle@psc.mo.gov)

### **CERTIFICATE OF SERVICE**

I hereby certify that true and correct copies of the foregoing were mailed, electronically mailed, or hand-delivered to all counsel of record this 7th day of December, 2018.

**/s/ Travis J. Pringle**