

Richard E. Lenza

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FILED

APR 0 2 2004

Missouri Public

Service Commission

April 1, 2004

## VIA OVERNIGHT DELIVERY

Missouri Public Service Commission 200 Madison Street Jefferson City, MO 65101

RE:

The Staff of the Missouri Public Service Commission v.

Kansas City Executive Suites, Inc.

Case No.: TC-2004-0408

Dear Sir of Madam:

Enclosed please find Respondent's Motion for Continuance with respect to the above-referenced matter. Enclosed also is copy of the Motion for Continuance. Please return a file-stamped copy to this office in the self-addressed, stamped envelope.

Very truly yours,

RICHARD E. LENZA

REL:jkc

Enclosures

cc:

Bruce H. Bates, Esq.

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## BEFORE THE PUBLIC SERVICE COMMISSION STATE OF MISSOURI

	2000		
\PR	0	2	2004

THE STAFF OF THE MISSOURI ) SERVICE COMMISSION )	Missouri Public Service Commission
Petitioner, )	Case No. TC 2004- 0408
vs. )	Case 110. 1 C 2001 0100
KANSAS CITY EXECUTIVE SUITES, INC.	
Respondent.	

## MOTION FOR CONTINUANCE

Respondent, by and through its attorneys, submits the following Motion for Continuance, the Respondent requests a thirty (30) continuance on the prehearing conference of the pre-hearing conference to be held on March 31, 2004, In support of this Motion Respondent states as follows:

- 1. Respondent is no longer in business;
- 2. The former principals of the Respondent are in the process of compiling the information necessary to file any reports that may be due.
  - 3. The continuance will not prejudice Complaintant;
- 4. This continuance is not requested to delay this matter but requested with the hope of resolving this matter without the necessity of taking up the valuable time of the Commission.
  - 5. Counsel for Complaintant is not opposed to this Motion for Continuance.

THEREFORE, Respondent respectfully requests that the Commission continue the hearing for thirty (30) days in the above matter.

Respectfully submitted,

SHUGHART, THOMSON & KILROY, P.C.

Date:

By: \_\_

Richard E. Lenza

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ATTORNEYS FOR PETITIONER

## **CERTIFICATE OF SERVICE**

I hereby certify that a copy of the above and foregoing Motion for Continuance was, on the 31st day of March, 2004, deposited in the United States mail (and a copy faxed), postage prepaid, and properly addressed to:

Bruce H. Bates, Esq.
Associate General Counsel
Missouri Public Service Commission
P. O. Box 360
Jefferson City, Missouri 65102

Fax No. 573-751-8285

Richard E. Lenza