

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

The Staff of the Missouri Public Service Commission,)	
)	
Complainant,)	
v.)	<u>Case No. WC-2022-0295</u>
)	
I-70 Mobile City, Inc. d/b/a I-70 Mobile City Park,)	
)	
Respondent)	

MOTION FOR CONTINUANCE

COMES NOW Staff of the Missouri Public Service Commission (“Staff”), by and through counsel, and for its *Motion for Continuance* states as follows:

1. On April 14, 2023, Staff filed a *Motion to Compel Answers to Certain Data Requests* (“*Motion to Compel*”) with the Commission.
2. Respondent I-70 Mobile City, Inc. d/b/a I-70 Mobile City Park filed its Response on April 24, 2023.
3. A WebEx hearing on Staff’s *Motion to Compel* is currently set for May 10, 2023, at 1:30 p.m.
4. The parties are currently in the process of discussing a possible settlement to resolve the issues in the above-captioned case and ask for a continuance of two weeks within which counsel for Respondent has indicated she will draft a proposed stipulation containing language previously discussed with counsel for Staff. The parties will use that time to work through any further discussions to arrive at a resolution acceptable to all parties.

5. Counsel for Respondent has been contacted regarding this motion and consents to the extension of the hearing on Staff's *Motion to Compel* in this case of 14 days.

6. This motion is made in the interest of justice and not with the intent to unreasonably delay or hinder these proceedings in any manner.

WHEREFORE, for the foregoing reasons, Staff requests the Commission to continue this matter for 14 days, and if the parties have not provided reasonable assurances of or entered into a settlement agreement to resolve this case by the end of that time, then to reset the Staff's *Motion to Compel* for hearing and argument, and for such other orders it deems reasonable and just under the circumstances.

Respectfully submitted,

/s/ Carolyn H. Kerr

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served by electronic mail, or First Class United States Postal Mail, postage prepaid, on this 9th day of May, 2023, to all counsel of record.

/s/ Carolyn H. Kerr