

**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)	

STATUS REPORT

COMES NOW the Staff of the Missouri Public Service Commission (“Staff”), by and through counsel, and pursuant to the July 29, 2022 *Order Suspending Procedural Schedule and Directing Filing of a Monthly Status Report*, states as follows:

1. Respondent I-70 Mobile City, Inc. d/b/a I-70 Mobile City Park’s (“I-70 MCP”) *Motion to Stay*; the Commission’s *Petition for Order to Permit Entrance Upon Land and Inspection of Property*, filed in accordance with the Commission’s September 14, 2022 Order; and the Commission’s *Motion in Limine* were all heard and taken under advisement at the November 28, 2022 hearing in the Cole County Circuit Court Case No. 22AC-CC05836.

2. To date, no decision has been rendered in Cole County Circuit Court Case Number 22AC-CC05836.

3. On November 23, 2022, Respondent filed a *Motion for Summary Determination* with the Commission in the above-captioned case, Case Number WC-2022-0295. A Response to that *Motion* was due no later than December 23, 2022.

4. On December 7, 2022, Staff filed a *Motion to Stay* the response deadline to the Summary Determination Motion in order to complete discovery, and on December 8, 2022, I-70 MCP filed a *Motion for Protective Order* requesting the Commission to stay discovery until its *Motion for Summary Determination* is ruled upon. Responses to both Motions were filed by each party on December 13, 2022, as ordered by the Commission.

5. On December 21, 2022, the Commission granted Staff's request to stay I-70 MCP's *Motion for Summary Determination*, stating it will set a new deadline for responses after the resolution of the Cole County Circuit Court Case No.22AC-CC05836.

WHEREFORE, the Staff respectfully offers and requests the Commission accept the foregoing Status Report in this case and grant any further relief as the Commission considers just and reasonable in 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 27th day of December, 2022, to all counsel of record.

/s/ Carolyn H. Kerr