

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

The Staff of the Missouri Public Service Commission,)	
)	
Complainant,)	
)	
V.)	<u>Case No. WC-2022-0289</u>
)	<u>SC-2022-0290</u>
Northgate MHP Lindale, LLC,)	
d/b/a Northgate Manufactured)	
Home Community,)	
)	
Respondent.)	

**MOTION FOR EXTENSION OF TIME TO FILE
JOINT PROPOSED SCHEDULE**

COMES NOW the Staff of the Missouri Public Service Commission (“Staff”), through counsel, and in support of this *Motion for Extension of Time to File Joint Proposed Schedule* states as follows:

1. On April 15, 2022, Staff filed *Staff’s Complaint* in the above-captioned case. Respondent Northgate MHP Lindale, LLC, d/b/a Northgate Manufactured Home Community (“Northgate”) filed its Answer on June 3, 2022.
2. On June 6, 2022, the Commission ordered the parties to submit a request for an extension of time or a joint procedural schedule no later than July 5, 2022.
3. Based on the parties having been in communication with each other regarding a possible resolution of this matter, the Commission entered an order on July 6, 2022, granting an extension of time until August 4, 2022, to either submit a request for an extension of time or a joint proposed procedural schedule.
4. On July 14, 2022, the parties filed a Stipulation and Agreement with the Commission resolving the issues in the above-captioned case and requesting the

Commission issue an Order approving the terms and conditions of the Stipulation and Agreement.

5. To date, no order has been entered by the Commission with regard to the Stipulation and Agreement filed by the Parties to finalize this case.

6. As such, Staff requests an additional 30 days extension of time for parties to obtain a Commission Order finalizing this matter. No parties oppose this request.

7. 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, Staff requests the Commission grant a 30-day extension of time to allow the Commission to enter an order in this matter approving the Stipulation and Agreement filed by the Parties in this case, and for any other such orders and relief as the Commission sees just and reasonable under the circumstances.

Respectfully submitted,

/s/ Carolyn H. Kerr
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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been electronically mailed to all parties and/or counsel of record on this 3rd day of August, 2022.

/s/ Carolyn H. Kerr