

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

The Staff of the Missouri Public Service Commission,  
Complainant,  
v.  
Northgate MHP Lindale, LLC,  
d/b/a Northgate Manufactured Home Community,  
Respondent.

**Case No. WC-2022-0289**  
**SC-2022-0290**

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

**COMES NOW** the Staff of the Missouri Public Service Commission (“Staff”), through counsel, and moves the Commission for an order states the following in support of this motion:

1. On April 15, 2022, Staff filed *Staff’s Complaint* in the above-captioned cause. 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. The parties have been in communication with each other regarding a possible resolution of this matter which may result in an amicable solution and need additional time to finalize their agreement.
4. As such, Staff requests an additional 30 days within which to work with Northgate to resolve the issues involved in this case and reach a mutually agreeable settlement agreement herein. All parties stated that they do not oppose this request.

5. 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 for the parties to formalize their agreement in this matter, 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 5<sup>th</sup> day of July, 2022.

**/s/ Carolyn H. Kerr**