

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

The Staff of the Missouri Public Service Commission,	)	
	)	
Complainant,	)	
v.	)	<b><u>Case No. WC-2022-0295</u></b>
	)	
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. On January 29, 2023, the Cole County Circuit Court entered an *Order and Judgment* in Case Number 22AC-CC05836 in favor of Commission Staff and ordered Respondent I-70 MCP to agree upon a reasonable date for Commission Staff to conduct its requested *Inspection of Property*, in accordance with the Commission’s September 14, 2022, discovery order.

2. The Staff then conducted an inspection of the I-70 MCP premises on March 8, 2023, after the Commission entered its February 8, 2023 *Order Denying I-70 Mobile City Park’s Motion for a Protective Order*, finding the Staff’s discovery requests “appropriate and reasonably calculated to lead to discovery of admissible evidence and comply with the requirements of Missouri Rule of Civil Procedure 56.01(a) and (b).”

3. Following the March 8, 2023 inspection, both parties issued additional Data Requests.

4. On March 30, 2023, the Commission held a discovery conference, at which time the Staff raised several issues it had regarding obtaining responses to Data Requests and updated information. The Commission continued the outstanding Motion for

Summary Determination and authorized the parties to file discovery motions to compel answers to any outstanding Data Requests or other discovery.<sup>1</sup>

5. On April 14, 2023, Staff filed a *Motion to Compel Answers to Certain Data Requests* (“*Motion to Compel*”), specifically asking the Commission to order Respondent “to provide full and complete responses to data requests 14, 19, 20, 42, and 44.”

6. Respondent filed its Response to Staff’s *Motion to Compel* on April 24, 2023, which included a request for hearing on the motion.

7. Other than Staff’s *Motion to Compel*, the only other outstanding motion is Respondent’s *Motion for Summary Determination*.

**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 26th day of April, 2023, to all counsel of record.

**/s/ Carolyn H. Kerr**

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<sup>1</sup> See, *Order Relieving the Parties from Filing a Procedural Schedule and Continuing the Summary Determination Motion*, issued / effective April 5, 2023.