BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

Director of the Manufactured Housing and)
Modular Units Program of the Public)
Service Commission,)
Complainant,))))
V.)
America's Home Brokers, Inc.))))
Respondent.)

Case No. MC-2005-0028

<u>JOINT MOTION TO SUSPEND BRIEFING SCHEDULE</u> <u>AND MOTION FOR EXPEDITED TREATMENT</u>

COME NOW the Director of the Manufactured Housing and Modular Units Program of the Public Service Commission ("Director" and "Program"), by and through the Missouri Public Service Commission's ("Commission") Office of General Counsel and America's Home Broker's Counsel and for their joint motion state as follows:

1. On March 24, 2005, the Commission issued an *Order Establishing Briefing Schedule*, wherein it directed, "simultaneous initial briefs will be due April 8, 2005 and simultaneous reply briefs will be due April 18, 2005."

2. Since the evidentiary hearing in this matter on March 3, 2005, the Parties have continued to discuss the possibility of a stipulated agreement. The Parties have reached an agreement in principle on terms that the parties believe will be acceptable to the Commission.

3. The parties are in the process of preparing a stipulated agreement for presentation to the Commission. The parties request a suspension of the briefing schedule until the Commission can review and rule on whether such a stipulated agreement would be acceptable. Neither party believes that any harm would come from granting this *Joint Motion to Suspend Briefing Schedule and Motion for Expedited Treatment*. Further, the Parties believe that a stipulated agreement will enable the Parties to provide a complete remedy to the aggrieved homeowners in this case.

4. The Parties propose to submit a Stipulated Agreement to the Commission by April 15, 2005.

5. Because the initial briefs in this case are due just four days after the filing of this motion, the parties request an expedited ruling on this motion.

WHEREFORE, the Parties request that the Commission grant their *Joint Motion to Suspend Briefing Schedule and Motion for Expedited Treatment* and proposed submittal date for their Stipulated Agreement.

Respectfully submitted,

DANA K. JOYCE General Counsel

/s/ Mary E. Weston

Mary E. Weston Assistant General Counsel Missouri Bar No. 54669

Attorney for the Director of the Manufactured Housing and Modular Units Program of the Missouri Public Service Commission P. O. Box 360 Jefferson City, MO 65102 (573) 751-6726 (573) 751-9285 (Fax) mary.weston@psc.mo.gov

/s/ Laurence D. Mass

Laurence D. Mass Missouri Bar No. 30977

230 S. Bemiston Ave., Suite 1200
Clayton, MO 63105
(314) 862-3333x20
(314) 862-0605 fax
Attorney for America's Home Brokers, Inc.

Certificate of Service

I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted by facsimile or electronically mailed to all counsel of record this 4th day of April 2005.

/s/ Mary E. Weston