

***Craig Mershon***

11931 El Sabado Drive  
St. Louis, MO 63138

February 26, 2013

Missouri Public Service Commission Data Center  
Missouri Public Service Commission  
200 Madison Street  
Jefferson City, Missouri 65201

**FILED**

**MAR 12 2014**

**Missouri Public  
Service Commission**

To Whom It May Concern:

Here is another pleading that I am filing and I was told to send it to you. I am doing this so everyone can receive a copy of it. I apologize for sending this pleading to you, but it was necessary. Thank you for your time and attention in this matter.

Sincerely,



Craig D Mershon

cc: Mr. Morris Woodruff, Secretary  
Missouri Public Service Commission  
200 Madison Street  
Jefferson City, Missouri 65201

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

**FILED**

**MAR 12 2014**

Craig Mershon       )  
Complainant,       )  
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File No. EC 2013-0521

**Missouri Public  
Service Commission**

vs

Union Electric Company a/k/a Ameren Missouri  
Respondent,

**MOTION FOR A HEARING REGARDING  
UNFAIR TREATMENT BY UNION ELECTRIC  
COMPANY AND MISSOURI PUBLIC SERVICE  
COMMISSION AND ITS  
LEGAL TEAM**

Comes now, Mr. Craig Mershon in a request for a telephone hearing regarding the unfair treatment that has continued since the beginning of this complaint by the following individuals exhibiting unfair treatment.

Mr. Jeffrey Keevil, Attorney for the Staff of the Missouri Public Service Commission.

Mr. Daniel Jordan, Regulatory Judge for the Case Number EC 2013-0521.

Ms. Sarah Giboney, Attorney for Union Electric Company a/b/a Ameren Missouri.

## **BACKGROUND**

From the beginning of this case and the first hearing Mr. Mershon has had problems with the opposing attorneys and the unfair treatment of his case by Mr. Jordan, Regulatory Judge. Mr. Mershon has asked for extra time to do pleadings because he has a visual disability meaning he is legally blind his visual acuity is as follows: 2000/20 in his left eye and 2100/20 in his right eye he also has cerebral palsy which limits his movement leaving him unable to advance at a swift pace. He uses software called Dragon Naturally Speaking to dictate his responses which takes time because Dragon does not move very swiftly even though Mr. Mershon talks very rapidly if he needs to but it takes time for Mr. Mershon to dictate his responses. Mr. Jordan denied Mr. Mershon the right for extra time to do his pleadings. Mr. Mershon requested Mr. Jordan, Mr. Keevil, and Ms. Giboney give Mr. Mershon time to complete his pleadings with the extra time he can use which is considered an accommodation because of his disability. Mr. Jordan has allowed Mr. Keevil and Ms. Giboney as well as himself to treat Mr. Mershon with disrespect. They have not given him enough time to send his pleadings and making decisions which makes it hard for Mr. Mershon to complete his case and his investigation as well. Ms. Giboney makes it a practice to constantly interrupt Mr. Mershon as he is talking and this has happened on every conference that he has been involved in with Mr. Mershon. This is a continued frustration for Mr. Mershon and very disrespectful.

Mr. Jordan instructed Mr. Mershon to send all of his pleadings to the Missouri Public Service Commission Data Center and he has done so from the time he was given that instruction. Ms. Giboney has requested that Mr. Mershon send her pleadings when all the other pleadings have been sent through the Data Center. Mr. Mershon has had a telephone conference about being treated unfairly by Mr. Giboney and Mr. Keevil. Mr. Jordan seems to take sides with the Missouri Public Service Commission and Mr. Mershon does not feel that he has been fair from the beginning of this process. Mr. Mershon has asked for time to complete discovery which is part of the hearing process which is customary even in a civil or criminal case. Thus far Mr. Mershon strongly believes he has not been treated fairly.

### **MOTION OF OBJECTION OF FIRST SET OF MOTION FOR PRODUCTION OF DOCUMENTS**

Mr. Jordan has ultimately denied Mr. Mershon's requests for documents because of what he calls being too broad. Mr. Mershon has asked for documents only dealing with his case and they are not overbroad. Mr. Jordan has made it very difficult for Mr. Mershon to defend his case. He has chosen to be with Ms. Giboney and Mr. Keevil. This has been since the beginning of this case. Mr. Mershon feels that this is unfair treatment when Mr. Jordan should be a neutral party. He seems to be taking the side of Ameren Missouri and The Commission. Due to the unfair and poor treatment Mr. Mershon has received from all three legal representatives he is requesting a telephone conference with Mr. Keevil and his supervisor (name unknown) and with Mr. Jordan and his supervisor

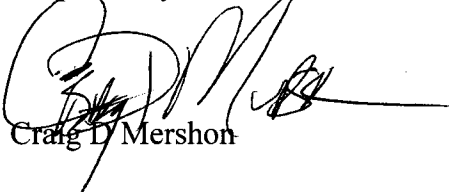
(name unknown) and Ms. Giboney and her supervisor (name unknown). Mr. Mershon has other documents that he has submitted regarding this case. They are forthcoming. They are as follows: **Renewal of Is Objection to the Denial of Relief for Injunctive Relief and a Motion to Dismiss Utility Bill Charges.** Mr. Mershon still wants to address the unfair treatment that he has been experiencing from these three individuals dealing with his case.

### **MOTION TO STAY**

Mr. Mershon is requesting a Motion to Stay and no other activity take place until this situation has been resolved. He request no evidentiary hearing take place until discovery is completed. Mr. Mershon does not want to file litigation against any of the individuals mentioned in this pleading. He will do so if something cannot be worked out. The treatment by those three individuals is very unnecessary. Mr. Mershon will not participate in any evidentiary hearing without the completion of discovery. It is only fair that Mr. Mershon be allowed to complete his discovery. The telephone hearing outlining the treatment that was delivered by Mr. Keevil, Ms. Giboney and Mr. Jordan should take place within several days.

**Therefore,** Mr. Mershon is requesting a telephone hearing to discuss the unfair treatment he has been experiencing with the three individuals mentioned in this pleading and their supervisors. He requests a telephone hearing to discuss the unfair treatment that has been going on from the beginning of this case.

Respectively submitted,



Craig D Mershon