

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

Director of the Manufactured Housing)	
and Modular Units Program of the)	
Public Service Commission,)	
)	
Complainant,)	
)	
v.)	Case No. MC-2004-0078
)	
A & G Commercial Trucking, Inc.,)	
)	
Respondent.)	

**RESPONDENT'S OBJECTION TO COMPLAINANT'S
MOTION FOR ISSUANCE OF SUBPOENAS FEWER
THAN TWENTY DAYS BEFORE HEARING
OR ALTERNATIVE MOTION FOR CONTINUANCE**

COMES NOW Respondent and objects to Complainant's Motion for Issuance of Subpoenas Fewer than Twenty Days Before Hearing and in the alternative moves to continue the hearing in this cause in this cause and in support states as follows:

1. As is stated in paragraph 4 of the Complainant's motion, the Complaint filed in this case on or about August 5, 2003, mentions Mr. and Mrs. Ridnour and their home by name. Complainant has known from the outset of this case, therefore, that the Ridnours are necessary witnesses and that their manufactured home is the subject of this action. Therefore, Respondent disputes the assertion by Complainant that good cause exists to issue the subpoenas in question, and Respondent questions the assertion in paragraph 6 of Complainant's motion that it was not possible for Complainant to request or

for the Commission to issue subpoenas to Mr. and Mrs. Ridnour more than twenty days before the hearing in this cause.

2. Complainant's motion alleges that new facts relating to the Ridnour home became known to Complainant on or about May 17, 2004. If that is correct, then Respondent is entitled to know those facts and to take the depositions of Mr. and Mrs. Ridnour prior to the hearing in this case. The case is set for hearing on June 1, 2004, which does not allow sufficient time to depose these witnesses. Accordingly, Respondent requests a continuance of the hearing to allow the parties time to depose Mr. and Mrs. Ridnour.

WHEREFORE, Respondent prays that Complainant's motion be denied, and in the alternative that the hearing of this matter be continued.

/s/ Thomas M. Harrison

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The undersigned certifies that a complete and conformed copy of the foregoing document was faxed and mailed to each attorney who represents any party to the foregoing action, by U.S. Mail, postage prepaid in the proper amount, at said attorney's business address.

/s/ Thomas M. Harrison

Dated: May 21, 2004