

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

Carol R. Mills' Request to Transfer Water)
System at Carriage Oaks Estate)
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File No. WM-2022-0144

**MOTION TO SUPSEND PROCEDURAL SCHEDULE PENDING FILING
OF AMENDED APPLICATION DOCUMENTS**

COMES NOW Carl Richard Mills, by and through counsel, and respectfully requests the Commission temporarily suspend procedural deadlines pending Mr. Mills' filing of an amended application to transfer documents and states as follows in support:

1. Undersigned counsel is aware of deficiencies in the existing application to transfer and is working with Mr. Mills to remedy the application. Mr. Mills intends to file an amended application as soon as possible. However, counsel for Mr. Mills has multiple hearings and trials scheduled in April and requires additional time to complete the amended application documents.
2. Moreover, Mr. Mills and interested parties are collaboratively working to prepare Carriage Oaks Estates Water and Sewer Not-For-Profit, the intended recipient of the water system, for receipt of the system pending Commission approval and addressing potential concerns related to the transfer.
3. Accordingly, Mr. Mills respectfully requests the Commission temporarily suspend procedural deadlines, including but not limited to the deadline for Staff Recommendation, pending Mr. Mill's submission of an amended application to transfer.

WHEREFORE, Carl R. Mills respectfully requests the Commission temporarily suspend procedural deadlines; and grant such other relief as appropriate.

April 4, 2022

HUSCH BLACKWELL LLP

/s/ Larissa M. Whittingham

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been electronically submitted to all parties and/or their counsel of record this 4th day of April, 2022.

/s/Larissa M. Whittingham

Attorney