

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

Director of the Manufactured Housing and)	
Modular Units Program of the Missouri)	
Public Service Commission,)	
)	
Complainant,)	
)	
v.)	
)	Case No. MC-2008-0071
Amega Sales, Inc.)	
d/b/a Quality Preowned Homes, Columbia)	
Discount Homes, Mark Twain Mobile)	
Home Sales, and Chateau Homes,)	
)	
Respondent.)	

**DIRECTOR'S DATA REQUESTS REGARDING COMPLIANCE WITH
COMMISSION ORDER DATED JULY 1, 2008**

COMES NOW the Director, and pursuant to Commission Rule 4 CSR 240-2.090(2) propounds the following data requests directed to Respondent, to be answered fully, completely, and pursuant to law within twenty (20) days or by December 31, 2008. These data requests must be signed by a person able to attest to their truthfulness. These data requests are deemed to be continuing in nature, and should you, your counsel, or anyone acting on your behalf learn of any additional person or information relating to the matters to which these data requests inquire, you are required and directed to furnish such supplemental information to the Director by giving timely notice to the attorneys of record. Where knowledge or information is requested, such request shall be deemed by you to include your knowledge or information, and the knowledge or information of your attorneys, and those acting on your behalf.

INSTRUCTIONS AND DEFINITIONS

The following definitions are applicable to these data requests and, unless otherwise specifically stated, to all concurrent and future requests for discovery submitted by the Director.

1. The term “person” means any natural person, firm, partnership, association, joint venture, corporation, governmental agency, or other organization or legal or business entity, without any limitation, or any party to this litigation.

2. The term “document” means the original and any non-identical copy, regardless of origin or location, of any letter, memorandum, report, record, book, manual, pamphlet, brochure, form, court finding, study, handwritten notes, working paper, chart, paper, graph, photograph, tape, video tape, index, electronic recording or data processing card, or any other written, recorded, transcribed, punched, taped, filmed, or graphic materials, however produced or reproduced, to which Dale Whiteside and/or Whiteside Hidden Acres have or have had access.

3. “Identify” or “identity,” when used with reference to a “person” which is an “organization,” means state the organization’s full name and the address of its principal place of business. When used with reference to a natural person, state the person’s full name and present or last known residence address and present or last known position of employment or business affiliation and the last known address of such employment or business. When used with reference to a document as defined herein, identify the author or individual who prepared it, identify each person who signed it, state the type of document, state its designated recipient, state its present location, and identify each and all of its current custodians. If any such document formerly was, but no longer

is, in your possession or control because it is now missing or lost, identify each individual who last had custody thereof and fully explain the circumstances surrounding its loss or disappearance. If any such document was within your possession or control but has now been destroyed, identify all the individuals who authorized its destruction. If any such document was formerly in your possession or control but has been transferred (voluntarily or involuntarily) to others, identify all persons who last had possession and control of such document and identify all persons to whom such document was transferred.

4. The word “individual,” when referring to a person, means a natural person.

5. The word “organization” means any corporation or affiliated business entity, any government entity or subdivision or agency thereof, business trust, estate, trust, partnership of any sort, association, two or more persons having a joint or common interest, or any other legal or commercial entity.

6. The terms “and” and “or” shall be construed disjunctively or conjunctively as necessary in order to bring within the scope of each individual data request all information or documents as defined herein which might otherwise be construed to be outside its scope.

7. The term “communication” means any oral, written, mechanical, electronic, or other transmission of words, symbols, numbers or depictions to a person or persons, entity, file, or repository of data or information.

8. In the event that any information requested is withheld on the basis of a claim of privilege, state the ground or grounds of the privilege claimed, and, if any

documents as defined herein are claimed to be privileged, set forth the author, addressee, indicated or blind copies, date, number of pages, attachments or appendices, all persons to whom distributed, or shown or explained, present custodian, and a general description (e.g., letters or memorandums, etc.) of such document and the subject matter thereof, in sufficient detail to allow Complainant to assess the claim of privilege.

9. If any requested information is not provided on the basis that the disclosure would be burdensome or oppressive, state the number of documents to be identified, the approximate number of person-hours to be incurred in the identification, and the estimated cost of responding to the data request.

10. In the event that any document requested to be identified has been destroyed or otherwise disposed of since its preparation or receipt, identify the author, addressee, indicated or blind copies, date, number of pages, attachments or appendices; all persons to whom such document was distributed, shown or explained; present custodian; and a general description of the content of such document.

11. Any information provided that is considered highly confidential or proprietary must be identified as such by designating the documents with an HC or P.

DATA REQUESTS

1. Please provide documentary proof, including but not limited to contracts, agreements, affidavits, or other information, of fulfilling conditions a, b, c, and d of paragraph 3 on pages 5-8 of the Commission's July 1, 2008 Order. If contracts or written agreements are produced, a sworn affidavit should be attached providing explanation of the agreements and

explaining how the documents show proof of compliance with the conditions of probation.

2. Please provide documentary proof in the form of affidavits to show that Greg DeLine has complied with the condition in paragraph 3.r. on page 13 of the Commission's July 1, 2008 Order.

Respectfully submitted,

/s/Steven C. Reed

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Certificate of Service

I hereby certify that copies of the foregoing have been mailed, postage prepaid, to counsel for Amega, Tom Harrison, **Van Matre, Harrison, Volkert, and Hollis P.C.**, 1103 E. Broadway, Suite 101, P.O. Box 1017, Columbia, MO 65205, this 3rd day of December, 2008.

/s/ Steven C. Reed

Steven C. Reed