## 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 MOTION FOR CONTINUANCE

COMES NOW Respondent and moves for a continuance of the hearing in this case which is currently scheduled for April 26, 2004, at 8:30 a.m. In support of this motion, the undersigned states as follows:

- 1. As the Commission is aware, the Complainant and the Respondent have entered into a settlement stipulation, which as of the date of this motion is pending approval by the Commission. A hearing concerning approval of the settlement stipulation was held on Tuesday, April 13, 2004.
- 2. The undersigned and Respondent believe that all claims, disputes and controversies in this matter have been settled, subject only to approval of the settlement stipulation by the Commission. Accordingly, no discovery between the parties has taken place. If this matter is to be heard in a contested hearing, then Respondent will need to undertake discovery in order to prepare adequately for the hearing.

- 3. Additionally, one of the principal witnesses of Respondent, Greg DeLine, is scheduled to be outside the state of Missouri on business travel on April 26, 2004, and therefore will not be able to attend the hearing if it is held on April 26, 2004.
  - 4. This motion is made for good cause and not for unreasonable or unnecessary delay.

WHEREFORE, Respondent respectfully requests that the hearing of this matter be continued to a date certain in order to allow respondent to engage in discovery and, prepare adequately for the hearing, and to ensure that all of Respondent's necessary witnesses are able to attend the hearing.

/s/ Thomas M. Harrison

Thomas M. Harrison

Van Matre and Harrison, P.C.

1103 East Broadway, Suite 101

P. O. Box 1017

Columbia, Missouri 65205

(573) 874-7777

Missouri Bar Number 36617

Attorney for A & G Commercial Trucking, Inc.

The undersigned certifies that a complete and conformed copy of the foregoing document was 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: April 19, 2004