

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

|                                  |   |                       |
|----------------------------------|---|-----------------------|
| The Staff of the Missouri Public | ) |                       |
| Service Commission,              | ) |                       |
|                                  | ) |                       |
| Complainant,                     | ) |                       |
|                                  | ) | Case No. WC-2022-0295 |
| v.                               | ) | SC-2022-0296          |
|                                  | ) |                       |
| I-70 Mobile City, Inc.           | ) |                       |
| d/b/a I-70 Mobile City Park,     | ) |                       |
|                                  | ) |                       |
| Respondent.                      | ) |                       |

**I-70 MOBILE CITY’S MOTION FOR ORAL ARGUMENT ON  
AMENDED MOTION FOR SUMMARY DETERMINATION**

Respondent, I-70 Mobile City, Inc. d/b/a I-70 Mobile City Park (“I-70 Mobile City”), by and through counsel, respectfully requests the Commission set a hearing date on I-70 Mobile City’s Amended Motion for Summary Determination.

1. Respondent filed its Amended Motion for Summary Determination on September 22, 2023.
2. Staff filed its response on October 20, 2023.
3. 20 CSR 4240-2.117(G) authorizes the Commission to hear oral argument on a motion for summary determination.
4. A ruling in favor of I-70 Mobile City on its Amended Motion would dispose of this case and eliminate the need for a hearing altogether.
5. I-70 Mobile City’s available dates in December include the afternoon of December 14, as well as anytime on December 28 or 29. I-70 Mobile City’s available dates in January include January 11-12 or 15-17.

WHEREFORE, for the foregoing reasons, I-70 Mobile City respectfully requests the Commission set a date for oral argument on I-70 Mobile City's Amended Motion for Summary Determination, and for such other orders as are just and reasonable under the circumstances.

Respectfully submitted,  
**ELLINGER BELL LLC**

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d/b/a I-70 Mobile City Park*

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing was served upon all of the parties of record or their counsel, pursuant to the Service List maintained by the Data Center of the Missouri Public Service Commission, on this December 6, 2023.

/s/ Stephanie S. Bell  
Stephanie S. Bell