

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

The Manager of the Manufactured Homes)
and Modular Units Program of the)
Missouri Public Service Commission,)
)
Complainant,)
)
v.)
)
Stephen L. Johnson d/b/a Colony Cove, Inc.)
and/or Sequiota Investments, Inc.,)
3951 S. Mentor Ave., Lot 54)
Springfield, MO 65804,)
)
Respondent.)

Case No. MC-2025-0108

MOTION FOR LEAVE TO FILE FIRST AMENDED COMPLAINT

COMES NOW the Manager of the Manufactured Homes and Modular Units Program of the Missouri Public Service Commission (“Manager”), by and through the Office of Staff Counsel (“Staff”) of the Missouri Public Service Commission (“PSC” or Commission”), pursuant to 20 CSR 4240-2.080(18), and states as follows:

1. Staff filed its original *Complaint* against Respondent Stephen L. Johnson d/b/a Colony Cove, Inc. and/or Sequiota Investments, Inc., with the Commission on September 23, 2024.
2. Respondent has not yet filed an Answer to the above-referenced *Complaint*.
3. Staff requests leave to amend its *Complaint* in order to correct a term set forth in the Introduction of its *Complaint* and to clarify all of the relief sought in its original *Complaint*. The aforementioned *First Amended Complaint* was filed at the same as this *Motion* was filed. A true and accurate copy of said *First Amended Complaint* is attached hereto and made a part hereof as Exhibit 1.

4. 20 CSR 4240-2.080(18) allows Staff to file an Amended Complaint “within ten (10) days of filing unless a responsive pleading has already been filed, or at any time by leave of the commission.”

5. This Motion is made in the interest of justice and without the intent to unreasonably delay or hinder these proceedings in any manner.

WHEREFORE, Staff prays this Commission grant it leave to file its First Amended Complaint and for any other relief as this Commission deems appropriate under the circumstances.

Respectfully submitted,

/s/ Carolyn H. Kerr

Missouri Bar Number 45718

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Missouri Public Service Commission

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Missouri Public Service Commission

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served by electronic mail, or First Class United States Postal Mail, postage prepaid, on this 17th day of October, 2024, to all parties of record.

/s/ Carolyn H. Kerr