

IN THE INDIANA SUPREME COURT  
APPEAL NO: \_\_\_\_\_

NORTHCREST R.V. PARK, BARBEE	)	Indiana Court of Appeals
LANDING MOBILE HOME PARK,	)	Cause No. 18A-EX-01243
KUHN LAKE LAKESIDE RESORT	)	
	)	Appeal from Indiana Utility Regulatory
Appellants (Complainants below))	)	Commission, Cause No. 44973
	)	
-vs-	)	The Hon. James Huston, Chair
	)	The Hon. Sarah Freeman
LAKELAND REGIONAL SEWER	)	The Hon. David E. Ziegner
DISTRICT	)	The Hon. David Ober
	)	Commissioners
Appellee (Respondent Below)	)	
	)	The Hon. Lora L. Manion,
	)	Administrative Law Judge

**MOTION FOR LEAVE TO FILE REPLY BRIEF**

Comes now Appellee, Lakeland Regional Sewer District (“Lakeland”), by counsel, pursuant to Rule 34(D) of the Indiana Rules of Appellate Procedure, and respectfully requests leave of Court to file its Reply Brief in Support of Lakeland Regional Sewer District’s Verified Motion to Disqualify (“Reply”). In support of this Motion, Lakeland shows the Court as follows:

1. Lakeland filed its Verified Motion to Disqualify on January 31, 2019, requesting that Lewis & Kappes be disqualified from these proceedings for its violation of Rule 1.12 of the Indiana Rules of Professional Conduct.

2. Lewis & Kappes filed *Appellant NBK Complainants Verified Response in Opposition to Lakeland Regional Sewer District’s Verified Motion to Disqualify Counsel* (“Response”) on February 15, 2019.

3. Lewis & Kappes raises issues and interjects facts not specifically addressed in Lakeland's Motion to Disqualify.

4. Lakeland's Reply is necessary to afford Lakeland the opportunity to appropriately address the above-referenced issues and facts.

5. Additionally, Lakeland requests leave of court to file a reply brief in order to address several arguments raised by the Complainants that inaccurately portray the facts and/or issues presented in Lakeland's Motion to Disqualify.

6. Pursuant to Rule 34(D), Lakeland requests leave of Court to file its Reply, which is contemporaneously filed with this Motion.

WHEREFORE, Appellee, Lakeland Regional Sewer District, respectfully requests the Court grant it leave to file its Reply in Support of Lakeland Regional Sewer District's Verified Motion to Disqualify, and for all other just and proper relief in the premises.

CARSON, LLP

BY /s/ Eric M. Blume

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## CERTIFICATE OF SERVICE

I hereby certify that on the 20th day of February, 2019, the foregoing document was served upon the following parties by the electronic E-Filing system:

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/s/ Eric M. Blume

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