

STATE OF INDIANA
INDIANA UTILITY REGULATORY COMMISSION

IN THE MATTER OF THE APPEAL BY)
VILLAGE GREEN)
OF THE CONSUMER AFFAIRS)
DECISION IN COMPLAINTS 123364,) CAUSE NO. 45144
123365, 123367, AND 123394)
CONCERNING THE BILLING OF)
WATER AND SEWER SERVICES.)

**MOTION FOR CONTINUANCE
AND MODIFICATION OF PROCEDURAL SCHEDULE**

Appellant Village Green Manufactured Home Community (“Appellant” or “Movant”) in accordance with 170 IAC 1-1.1-18 and 170 IAC 1-1.1-20, respectfully requests the Commission to continue the evidentiary hearing scheduled to commence November 27, 2018 and modify the procedural schedule as set forth below. In support of this request, Movant states as follows:

1. The Movant recently discontinued its relationship with its counsel of record, Gary L. Griner, by mutual amicable agreement.
2. The record owner and managing member of the Movant are both Delaware limited liability companies whose principals reside in both New York and Florida.
3. Movant respectfully requests additional time in which to retain new counsel as well as time in which new counsel will be able to familiarize themselves with the instant matter.
4. Due to the upcoming Thanksgiving and Holiday/New Year Season, Movant is concerned that retaining the proper counsel for this matter may be difficult; especially in light of Movant’s need to travel to Indiana for meetings with potential counsel.
5. As such, the Movant respectfully requests the Commission to continue the current evidentiary hearing scheduled for November 27, 2018 to an available date in February 2019.
6. This Motion is not filed for purposes of delay.

WHEREFORE, the Movant respectfully requests that this Motion promptly be granted, that the evidentiary hearing be continued and that the Commission grant the Movant the relief sought herein together with such other relief as may be reasonable and appropriate.

Respectfully submitted,

A handwritten signature in black ink, consisting of several loops and a final flourish, positioned above a horizontal line.

Marissa Welner
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Authorized Signatory for Village
Green Manufactured Home
Community

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing has been served, this 15th day of November 2018, by electronic mail, hand-delivery, or U.S. Postal Service, First Class mail to:

DEBRA SPICE:

1623 Burnham Drive
Mishawaka, Indiana 46544

MELANIE SCHMALKUCHE:

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SHERRI MUSOLE:

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WILLIAM DAVIS:

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**INDIANA OFFICE OF THE UTILITY
CONSUMER COUNSELOR:**

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