

**BEFORE THE STATE CORPORATION COMMISSION
FOR THE STATE OF KANSAS**

In the matter of the Application of)	Docket No. 24-CONS-3103-CUNI
Cannady Oil Corporation for an order)	CONSERVATION DIVISION
Authorizing the Unitization and Unit)	License No.: 5303
Operation of the Irons Morrow Sand)	
<u>Unit in Clark County, Kansas</u>)	

**MOTION FOR LEAVE TO EXTEND TIME TO FILE MOTION FOR EXTENSION OF TIME
TO FILE PRE-FILED TESTIMONY OUT OF TIME**

COMES NOW, the Bair, Mahieu and O'Brien Defendants, by and through their counsel, Michelle Mahieu of Mahieu Elder Law PA, and respectfully request leave to request an extension of time to file their pre-filed testimony from January 12, 2024 to January 22, 2024. In support of said motion, Defendants state and allege they have the agreement of Robert J. McFadden to this extension. In addition, the delay in filing the motion for extension resulted from counsel's inability to access the electronic filing system, which issues were resolve today.

WHEREFORE, counsel for Defendants respectfully requests an order granting leave to file a Motion to Extend Time Pre-Filed Testimony out of time.

Respectfully submitted,

/s/ Michelle Mahieu
Michelle Mahieu, #19324
Mahieu Elder Law PA
100 Military Ave., Ste. 112
Dodge City, KS 67801
(620) 225-6789
mmahieu@mahieulaw.com

CERTIFICATE OF SERVICE

24-CONS-3103-CUNI

I, the undersigned, certify that a true copy of the attached **MOTION FOR LEAVE TO EXTEND TIME TO FILE MOTION FOR EXTENSION OF TIME TO FILE PRE-FILED TESTIMONY OUT OF TIME** has been served to the following by means of first class mail and/or electronic service on January 18, 2024.

ROBERT J. McFADDEN, Attorney
FOULSTON SIEFKIN LLP
1551 N. Waterfront Parkway
Suite 100
Wichita, KS 67206
rmcfadden@foulston.com

KELCEY MARSH, LITIGATION COUNSEL
KANSAS CORPORATION COMMISSION
CENTRAL OFFICE
266 N. MAIN ST, STE 220
WICHITA, KS 67202-1513
k.marsh@kcc.ks.gov

JAKE EASTES, GEOLOGIST SPECIALIST
KANSAS CORPORATION COMMISSION
266 N. MAIN ST, STE 220
WICHITA, KS 67202-1513
j.eastes@kcc.ks.gov

JONATHAN R. MYERS, ASSISTANT GENERAL COUNSEL
KANSAS CORPORATION COMMISSION
266 N. Main St., Ste. 220
WICHITA, KS 67202-1513
j.myers@kcc.ks.go

/s/ Michelle Mahieu

Michelle Mahieu