## BEFORE THE STATE CORPORATION COMMISSION OF THE STATE OF KANSAS

Before Commissioners:	Dwight D. Keen, Cha Shari Feist Albrecht Susan K. Duffy	ir
IN THE MATTER OF THE FAILURE OF ) QUITO, INC. ("OPERATOR") TO COMPLY ) WITH K.A.R. 82-3-111 AT THE SOLOMON ) #3 AND SOLOMON #5 IN CHAUTAUQUA )		DOCKET NO. 19-CONS-3271-CPEN
		CONSERVATION DIVISION
COUNTY, KANSAS.		LICENSE NO. 33594
IN THE MATTER OF THE FAILURE OF QUITO, INC. ("OPERATOR") TO COMPLY WITH K.A.R. 82-3-111 AT THE DOTY #3 IN		DOCKET NO. 19-CONS-3272-CPEN
		CONSERVATION DIVISION
CHAUTAUQUA COUNTY	, KANSAS. )	LICENSE NO. 33594

## MOTION FOR EXTENSION OF HEARING DATE

COMES NOW the Respondent, Quito, Inc. ("Quito"), and requests an extension of the hearing date, which hearing is now scheduled for June 20, 2019. In support of its Motion, Quito submits the following:

1. Quito filed its Prefiled Testimony on Wednesday, May 29, 2019.

2. On June 4, 2019, Quito filed three data requests to the Commission Staff, seeking information that is directly related to the hearing.

3. Because of the impending hearing date, June 20, 2019, and the fact that it will take Commission Staff some time to prepare responses to the data requests and for the undersigned and its clients to review the responses, the hearing date is no longer practicable.

4. This is the first request for an extension of the hearing date. This motion is not filed due to a desire for a delay or for any other impractical reason, but simply to give the undersigned and its client an opportunity to review the responses to the data requests. Commission Staff does not oppose this extension of time.

WHEREFORE, Quito, Inc., respectfully submits that the hearing in this matter be continued until the July hearing docket and for such further and additional relief as the Commission may find appropriate under the circumstances.

> Respectfully submitted, MARTIN, PRINGLE, OLIVER, WALLACE & BAUER, L.L.P.

By: <u>s/Jeff Kennedy</u> Jeff Kennedy, #12099 100 North Broadway, Suite 500 Wichita, KS 67202 Telephone: (316) 265-9311 Facsimile: (316) 265-2955 <u>jkennedy@martinpringle.com</u> *Attorneys for Quito, Inc.* 

## **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on the 10th day of June, 2019, the Motion for Extension of Hearing Date was electronically filed and served to the following by means of electronic service:

Lauren N. Wright, Esq. Litigation Counsel Kansas Corporation Commission 266 North Main, Suite 220 Wichita, KS 67202 Lwright@kcc.ks.gov

Jonathan R. Myers Assistant General Counsel Kansas Corporation Commission 266 North Main, Suite 220 Wichita, KS 67202 j.myers@kcc.ks.gov

> <u>s/Jeff Kennedy</u> Jeff Kennedy