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

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In the Matter of the Failure of Mark L. Haas (Operator) to Comply with K.A.R. 82-3-120 by Operating Under an Expired License. Docket No. 25-CONS-3087-CPEN

CONSERVATION DIVISION License No. 5935

## **ENTRY OF APPEARANCE AND REQUEST FOR HEARING**

Keith A. Brock, Anderson & Byrd, LLP, hereby enters his appearance in the above captioned matter on behalf of Mark L. Haas.

Mark L. Haas, by and through its counsel, Keith A. Brock, Anderson & Byrd, LLP, hereby requests a hearing in the above referenced matter pursuant to K.S.A. 55-164; K.S.A. 77-537 and K.S.A. 77-542. In support of this request, Mark L. Haas states as follows:

1. An evidentiary hearing should be held in this matter to determine if an actual violation of K.A.R. 82-3-120 occurred. Mark L. Haas denies that it committed the violations described in the penalty order issued in this docket.

WHEREFORE, Mark L. Haas prays for an order setting the above captioned docket for hearing pursuant to K.S.A. 55-164; K.S.A. 77-537 and K.S.A. 77-542.

Keith A. Brock, #24130 ANDERSON & BYRD, LLP 216 S. Hickory ~ P.O. Box 17 Ottawa, Kansas 66067 (785) 242-1234, telephone (785) 242-1279, facsimile kbrock@andersonbyrd.com Attorneys for Mark L. Haas

## STATE OF KANSAS, COUNTY OF FRANKLIN, ss:

Keith A. Brock, of lawful age, being first duly sworn on oath, states: That he is the attorney for Mark L. Haas, and is duly authorized to make this affidavit; that he has read the foregoing Request for Hearing, knows the contents thereof; and that the facts set forth therein are true and correct to the best of his knowledge, information and belief.

The

Keith A. Brock

SUBSCRIBED AND SWORN to before me this 20th day of September, 2024.

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Notary Public

Appointment/Commission Expires:

Y PUBUC - State of Kansa AMY J MARTZ

## **CERTIFICATE OF SERVICE**

I hereby certify that a copy of the above and foregoing was sent via U.S. Mail, postage prepaid, or electronically, this 20th day of September, 2024, addressed to:

Kelcey Marsh kelcey.marsh@ks.gov

Nancy Borst nancy.borst@ks.gov

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Keith A. Brock