

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

IN THE MATTER OF THE FAILURE OF)	DOCKET NO. 19-CONS-3271-CPEN
QUITO, INC. ("OPERATOR") TO COMPLY)	
WITH K.A.R. 82-3-111 AT THE SOLOMON)	CONSERVATION DIVISION
#3 AND SOLOMON #5 IN CHAUTAUQUA)	
COUNTY, KANSAS.)	LICENSE NO. 33594

IN THE MATTER OF THE FAILURE OF)	DOCKET NO. 19-CONS-3272-CPEN
QUITO, INC. ("OPERATOR") TO COMPLY)	
WITH K.A.R. 82-3-111 AT THE DOTY #3 IN)	CONSERVATION DIVISION
CHAUTAUQUA COUNTY, KANSAS.)	
)	LICENSE NO. 33594

JOINT MOTION FOR CONTINUANCE OF HEARING

Commission Staff ("Staff"), together with Respondent, Quito, Inc. ("Operator"), request an extension of the hearing date, which is now set for September 19, 2019. In support of their Motion, Staff and Operator submit the following:

1. On February 26, 2019, the Commission issued penalty orders against the Operator in these dockets, finding a total of three violations of K.A.R. 82-3-111.
2. On June 4, 2019, Operator filed three data requests to the Commission Staff, seeking information that is related to the issues to be discussed at the hearing.
3. Due to the volume of discovery requested, and replacement of Litigation Counsel on this docket, Staff has not yet completed responses to all three of Operator's discovery requests. However, Staff has provided Operator with some of the requested information.
4. Staff anticipates the need for at least two more weeks to fully complete Operator's discovery requests.

5. Once completed and delivered, Operator will need adequate time to review the responses. Moreover, both parties will need to prepare more generally for the anticipated hearing.

6. Due to the above reasons, Staff and Operator submit this motion jointly and request the Commission grant an extension on the hearing in this docket, currently set for September 19, 2019.

WHEREFORE, Staff and Operator respectfully submit that the hearing in this matter be continued approximately 60 days, until November 20, 2019, and for such further relief as the Commission deems just and reasonable.

Respectfully Submitted:

By: /s/ Carly R. Masenthin

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By: /s/ Jeff Kennedy

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VERIFICATION

STATE OF KANSAS)
) ss.
COUNTY OF SHAWNEE)

Carly Masenthin, of lawful age, being duly sworn upon her oath deposes and states that she is Litigation Counsel for the State Corporation Commission of the State of Kansas; that she has read and is familiar with the foregoing *Joint Motion for Continuance of Hearing*, and attests that the statements therein are true to the best of her knowledge, information and belief.

Carly Masenthin

Carly Masenthin, S. Ct. #27944
Litigation Counsel
The State Corporation Commission
of the State of Kansas

SUBSCRIBED AND SWORN to before me this 3rd day of September, 2019.



Vicki D. Jacobsen
Notary Public

My Appointment Expires: 6-30-22

CERTIFICATE OF SERVICE

19-CONS-3271-CPEN & 19-CONS-3272-CPEN

I, the undersigned, certify that a true and correct copy of the above and foregoing Joint Motion for Continuance of Hearing was served via electronic service this 3rd day of September, 2019, to the following:

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/s/ Vicki Jacobsen
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