

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

In the Matter of the Investigation of **D & M Marketing** )  
**LLC, of Larned, Kansas**, Regarding the Violation(s) )  
of the Motor Carrier Safety Statutes, Rules and )  
Regulations and the Commission's Authority to Impose ) Docket No. 24-TRAM-258-PEN  
Penalties, Sanctions and/or the Revocation of Motor )  
Carrier Authority. )

**NOTICE OF FILING OF REQUEST FOR HEARING**

The attached Request for Hearing is hereby filed in this docket on behalf of D & M Marketing LLC. After informal discussions held between the parties, D & M Marketing LLC has indicated it wishes to move forward with its request for hearing.

WHEREFORE, the attached Request for Hearing is hereby filed on behalf of D & M Marketing LLC for consideration by the Commission.

Respectfully submitted,

*/s/ Ahsan Latif*

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Ahsan A. Latif, S. Ct. #24709  
Litigation Counsel  
Kansas Corporation Commission  
1500 S.W. Arrowhead Road  
Topeka, Kansas 66604-4027  
Phone: 785-271-3118  
Fax: 785-271-3167  
Email: a.latif@kcc.ks.gov

Attorney for Commission Staff



ATTORNEYS AT LAW

GREGORY D. BELL  
greg@bellandrobinson.com

MICHAEL C. ROBINSON  
mike@bellandrobinson.com

October 12, 2023

Ahsan A. Latif  
Litigation Counsel  
Kansas Corporation Commission  
1500 SW Arrowhead Road  
Topeka, KS 66604-4027

Via USPS Mail and Email:  
a.latif@kcc.ks.gov

Gary Davenport, Deputy Director of Transportation  
Jared Smith, Public Service Executive  
1500 SW Arrowhead Road  
Topeka, KS 66604-4027

Via USPS Mail and Fax:  
785-271-3354

RE: Rae Rae Munden, Owner  
D&M Marketing LLC  
Date of Accident: April 5, 2023  
Docket No. 24-TRAM-258-PEN

Dear Mr. Latif, Mr. Davenport and Mr. Smith:

I have been retained by Rae Rae Munden, owner of D&M Marketing LLC, regarding the accident of April 5, 2023. I am in receipt of your final report that shows Level 1 violations. It is my understanding there were a number of prior reports which are contradictory. Our understanding is that a number of investigations were done with different findings. The issue is that the investigations carried out post-accident are not clear as to how the investigators arrived at their conclusions; therefore, at this time we are objecting to or appealing the findings.

Sincerely,

Bell and Robinson LLC

Michael C. Robinson  
MCR/mlp

cc: Rae Rae Munden

421 West 1<sup>st</sup> Avenue, Suite A  
Hutchinson, KS 67501-5280  
(620) 259-4411  
(620) 259-7969 Fax

## **CERTIFICATE OF SERVICE**

24-TRAM-258-PEN

I, the undersigned, certify that a true copy of the attached Motion has been served to the following by means of electronic service on February 8, 2024.

BRIAN G. FEDOTIN, GENERAL COUNSEL  
KANSAS CORPORATION COMMISSION  
1500 SW ARROWHEAD RD  
TOPEKA, KS 66604  
b.fedotin@kcc.ks.gov

AHSAN LATIF, LITIGATION COUNSEL  
KANSAS CORPORATION COMMISSION  
1500 SW ARROWHEAD RD  
TOPEKA, KS 66604  
a.latif@kcc.ks.gov

Rae Rae Munden, OWNER  
D & M Marketing LLC  
1852 90th Ave  
Larned, KS 67550  
raeraemunden@gmail.com

Michael C. Robinson, LEGAL COUNSEL  
Bell and Robinson LLC  
421 West 1st Ave  
Ste A  
Hutchinson, KS 67501  
mike@bellandrobinson.com

/S/ Kiley McManaman  
Kiley McManaman

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