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BEFORE

THE PUBLICC UTILITIES COMMISSION OF O贈傳 SEP 28 PM 3: 03

LAKE VILLAGE CLUB, INC.)	CASE NO. 10-1351-WW. & UCO
Complainant,	}	
CAMPLANDS WATER, LLC.)	
Respondent.)	

CAMPLANDS WATER, LLC, MOTION FOR EXTENSION OF TIME

Respondent Camplands Water, LLC, ("Camplands") hereby, through its' counsel, moves the Public Utilities Commission of Ohio ("Commission") for an extension of time for the filing of its answer or other pleading to the Complaint of the Lake Village Club, Inc.

A Memorandum in Support of this Motion is filed herewith.

Respectfully Submitted,

Henry W. Eckhart (0020202)

Counsel of record for Camplands Water, LLC 50 West Broad Street, #2117 Columbus Ohio 43215

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MEMORANDUM IN SUPPORT OF MOTION FOR EXTENSION OF TIME

The Ohio Administrative Code Chapter 4901-1-13 provides in pertinent part as follows:

Continuances and extensions of time

(A) Except as otherwise provided by law, and not withstanding any other provision in this chapter, continuances of public hearings and extensions of time to file pleadings or other papers may be granted upon motion of any party <u>for good cause shown</u>, or upon motion of the commission, the legal director, the deputy legal director, or an attorney examiner. (Emphasis added).

The "good cause" for the granting of this Motion is that the original mail notice from the Commission was mailed on September 10, 2010 to Camplands Water LLC at the Andover,

Ohio address of the physical plant of the water facility and it was not forwarded to Marvin

Goldenberg, the President of the company in a timely manner.

Mr. Goldenberg was not in his residence in Boston, Massachusetts until Monday, September 27, 2010 and that was the first time he saw the Commission notice. He immediately called this counsel, who has represented the company before and left a message after 5:00 PM.

Counsel returned his call on September 28, 2010 and it was determined that it would not be feasible to properly prepare an answer or other pleading to the subject complaint by September 30, 2010.

WHEREFORE, Camplands Water, LLC, respectfully requests that the Commission grant its Motion for an extension of time to move or plead to the Complaint for at least a period of 30 days from the filing of this Motion.

Respectfully submitted,

Henry W. Eckhart (0020202)

Counsel of Record for Camplands Water, LLC

CERTIFICATE OF SERVICE

The undersigned hereby certifies that he has served a copy of the forgoing Motion and Memorandum on MARK A. WHITT, at Carpenter, Lipps & Leland LLP, 280 Plaza, Suite 1300, 280 North High Street, Columbus Ohio 43215, by first class US mail, postage prepaid, also by facsimile transmission at (614) 365-9145, and by electronic transmission at whitt@carpenterlipps.com, on the 28th day of September, 2010.

Henry W. Eckhart