

**BEFORE THE
PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Complaint of The K&D)	
Group, Inc. and Reserve Apartments, LTD,)	
)	
Complainants,)	Case No. 11-898-HT-CSS
)	
v.)	
)	
Cleveland Thermal Steam Distribution, LLC,)	
)	
Respondent.)	

MOTION FOR EXTENSION OF TIME

Gretchen J. Hummel (Trial Attorney)
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July 2, 2012

**Attorneys for Cleveland Thermal Steam
Distribution, LLC**

**BEFORE THE
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Cleveland Thermal Steam Distribution, LLC,)	
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Respondent.)	

MOTION FOR EXTENSION OF TIME

On June 29, 2012, the Complainant, The K&D Group, Inc. and Reserve Apartments, LTD (“Complainants”) filed an Application for Rehearing of the Commission’s May 30, 2012 Entry dismissing the complaint in Case No. 11-898-HT-CSS. Under §4903.10, Revised Code, and Rule 4901-1-35, Ohio Administrative Code (O.A.C.), any party may file a memorandum contra within ten days after the filing of an application for rehearing.

Respectfully, Respondent, Cleveland Thermal Steam Distribution, LLC (“Cleveland Thermal”), hereby requests that the due date for memorandum contra be extended by ten days. This motion is not opposed by Complainants. The reasons for this motion are set forth in the accompanying Memorandum of Support.

Respectfully submitted,

/s/ Scott E. Elisar

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Cleveland Thermal Steam Distribution, LLC,)	
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Respondent.)	

MEMORANDUM IN SUPPORT

On June 29, 2012, the Complainants filed an Application for Rehearing of the Commission's Entry in Case No. 11-898-HT-CSS dismissing the Complaint in this matter. Pursuant to §4903.10, Revised Code, and Rule 4901-1-35, O.A.C., the Respondent may file a memorandum contra opposing the Application for Rehearing.

Counsel of record for Cleveland Thermal previously scheduled vacation and will be out of state. Counsel for Respondent has contacted a legal representative of the Complainants and secured agreement to a ten day continuance of the filing of the memorandum contra. If the Commission grants the continuance, the Respondent's memorandum contra Complainants' Application for Rehearing would be due on July 19, 2012.

Therefore, Respondent respectfully requests an entry granting the Motion for Extension of Time and permitting the Respondent to file its memorandum opposing Complainants' Application for Rehearing on or before July 19, 2012.

Respectfully submitted,

/s/ Scott E. Elisar

Scott E. Elisar

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing *Motion for Extension of Time* has been hand-delivered, sent electronically or served *via* ordinary U.S. Mail, postage prepaid, this 2nd day of July, 2012 to the following parties of record.

/s/ Scott E. Elisar

Scott E. Elisar

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in

Case No(s). 11-0898-HT-CSS

Summary: Motion Cleveland Thermal Steam Distribution's Motion for Extension of Time electronically filed by Ms. Vicki L. Leach-Payne on behalf of Mr. Scott E. Elisar