

TENNESSEE REGULATORY AUTHORITY



502 Deaderick Street, 4th Floor
Nashville, Tennessee 37243

April 18, 2017

Sue Tollett
Cumberland County Clerk and Master
60 Justice Center Dr., Ste. 226
Crossville, TN 38555

Re: *Tennessee Public Utility Commission (formerly Tennessee Regulatory Authority)*
v. Laurel Hills Condominiums Property Owners Association,
Cumberland County Chancery Case No. 2012-CH-560

Dear Ms. Tollett:

Please find enclosed an original and one copy of a Motion to Continue that the Tennessee Public Utility Commission (formerly Tennessee Regulatory Authority) would like to file in the above referenced matter. Please return the copy, stamped "filed," in the enclosed self-addressed, stamped envelope. Also enclosed is an original and one copy of a proposed Order on the Motion to Continue to be lodged. Please return the copy, stamped "lodged," along with the stamped copy of the Motion. Please feel free to contact me with any questions.

Sincerely,



Aaron J. Conklin
aaron.conklin@tn.gov
(615) 770-6896

cc: James Gass
Scott D. Hall
Everett Sinor, Jr.
Vance Bromel
Roger York

**IN THE CHANCERY COURT OF CUMBERLAND COUNTY, TENNESSEE
THIRTEENTH JUDICIAL DISTRICT, AT CROSSVILLE**

**TENNESSEE PUBLIC UTILITY
COMMISSION (formerly TENNESSEE
REGULATORY AUTHORITY),**)
Petitioner,)
)
v.)
)
**LAUREL HILLS CONDOMINIUMS
PROPERTY OWNERS ASSOCIATION**)
Respondent.)
)
MOY TOY, LLC,)
Intervening Party.)

**No. 2012-CH-560
Chancellor Thurman**

MOTION TO CONTINUE HEARING

COMES NOW, Petitioner, the Tennessee Public Utility Commission (formerly Tennessee Regulatory Authority)¹ (“Petitioner”, “TPUC” or the “Commission”), and hereby moves this Honorable Court to continue the final hearing off this matter scheduled for May 15-16, 2017. As grounds for its Motion, the Petitioner would state as follows:

1. The parties to this matter scheduled this hearing date at the February 14, 2017 docket call.
2. At the time of the docket call, the parties to this matter were scheduled to participate in a mediation of this case and related cases on February 21, 2017.
3. As the parties were unable to resolve issues at mediation, the parties exchanged written discovery requests relative to the pending motions in this case.

¹ The Tennessee Regulatory Authority changed its name to the Tennessee Public Utility Commission effective April 4, 2017. *See* 2017 Tenn. Pub. Acts Ch. 94.

4. The parties have attempted to schedule depositions, but have encountered scheduling difficulties that have made scheduling and completion of depositions prior to the scheduled hearing date impossible.

5. It is necessary to continue the hearing scheduled for May 15-16, 2017 in order to allow the parties to complete discovery.

6. There is no opposition to the continuance of the scheduled hearing from any party to this matter.

For the foregoing reasons, the Petitioner would respectfully request that the hearing of this matter scheduled for May 15-16, 2017 be continued. This matter will be set for further hearing at the next sounding of the docket.

Respectfully submitted,

TENNESSEE PUBLIC UTILITY COMMISSION

By: 

Aaron J. Conklin, BPR #018597
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Fax: (615) 741-9934
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the ____ day of April, 2017 an exact copy of the foregoing with exhibits included was served on the following parties by United States Postal Service, postage prepaid and, that a copy of the *Motion* was served by electronic mail as noted below, to:


James L. Gass
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103 Bruce Street
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Attorney for Respondent Laurel Hills

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3504 Robin Road
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Attorney for Receivership Management, Inc.
Court-Appointed Receiver for LHWS

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Attorney for Moy Toy, LLC



Aaron J. Conklin

**IN THE CHANCERY COURT OF CUMBERLAND COUNTY, TENNESSEE
THIRTEENTH JUDICIAL DISTRICT, AT CROSSVILLE**

TENNESSEE PUBLIC UTILITY)
COMMISSION (formerly TENNESSEE)
REGULATORY AUTHORITY),)
 Petitioner,)
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v.)
)
LAUREL HILLS CONDOMINIUMS)
PROPERTY OWNERS ASSOCIATION)
)
 Respondent.)
)
MOY TOY, LLC,)
)
 Intervening Party.)

**No. 2012-CH-560
Chancellor Thurman**

ORDER

It is ORDERED by the Court, that the hearing in the above styled cause, set for 1:00 O'clock P.M. on May 15, 2017 and 9:00 O'clock A.M. on May 16, 2017, is hereby continued, pursuant to the unopposed Motion of the Petitioner. Said matter shall be set for hearing at the next sounding of this Court's docket.

RONALD THURMAN, Chancellor

APPROVED FOR ENTRY:



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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 18th day of April, 2017 an exact copy of the foregoing with exhibits included was served on the following parties by United States Postal Service, postage prepaid and, that a copy of the *Motion* was served by electronic mail as noted below, to:

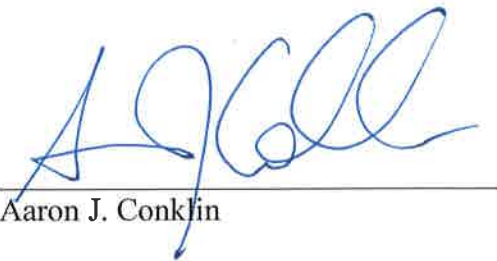
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