

the Supreme Court and this Commission's Rules of Procedure. Neither counsel for Taylor County, nor any licensed attorney acting upon behalf of the Commission, may knowingly assist or abet Complainant in his unauthorized practice of law.

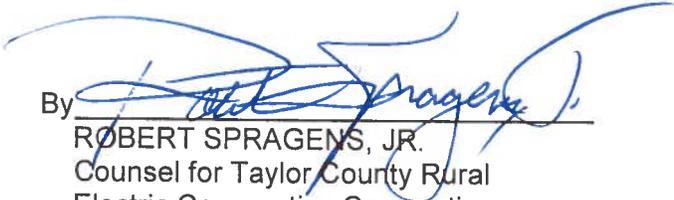
B. COMPLAINANT'S CONDUCT HEREIN MAKES A MOCKERY OF THE COMMISSION'S RULES OF PROCEDURE, AS WELL AS THE PROCEDURAL ORDER ENTERED HEREIN.

On June 17, 2013, the Commission entered herein a procedural Order which included a scheduling appendix. That appendix required that responses to the First Set of Requests for Information be filed and served not later than July 19, 2013. Counsel for Defendant, on or about July 24, 2013, noted that Complainant had not served timely responses to Defendant's First Set of Requests for Information. Counsel then examined the Commission's website to confirm the absence of the filing of such responses, and learned that Complainant had, on July 12, 2013, purported to file with the Commission three documents, including what purported to be responses to Defendant's requests for information. Upon downloading those documents which were received by the Commission on July 12th, it became immediately apparent that the documents are not in proper form and that they do not provide the identifying information required by the Commission's procedural Order. More importantly, the documents are not signed, and thus not verified; and service thereof upon Defendant and/or its counsel has not even been attempted as there appears no certification of service upon those documents. Furthermore, the document which purports to be entitled "Complainant Supplemental Requests for Information" is, in point of fact, the Complainant's First Set of Requests for Information which was to have been served on or before July 5, 2013, and that document, even if otherwise proper, would be untimely. The documents thus tendered by Complainant on July 12, 2013, are legal nullities.

Accordingly, Defendant further moves the Commission to strike from the record of this proceeding those non-conforming documents tendered for filing by Complainant on or about July 12, 2013, for all of those reasons set forth hereinabove.

Alternatively, and in the event that the Commission denies or defers a ruling upon Defendant's Motion to Dismiss this proceeding, Defendant moves the Commission to hold in abeyance the scheduling Order entered herein, and to schedule and conduct herein an informal conference in order to address the substantive and procedural issues set forth hereinabove.

SPRAGENS & HIGDON, P.S.C.
Attorneys at Law
15 Court Square - P. O. Box 681
Lebanon, Kentucky 40033
Telephone: (270) 692-3141
Facsimile: (270) 692-6693
Email: rspragens@spragenshigdowlaw.com.

By 
ROBERT SPRAGENS, JR.
Counsel for Taylor County Rural
Electric Cooperative Corporation

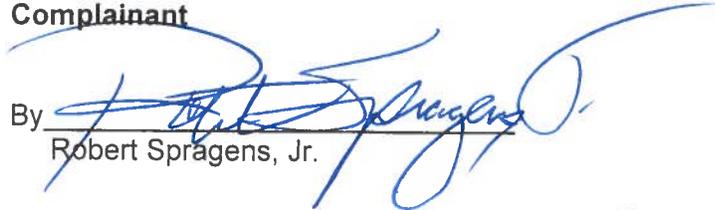
I hereby certify that a true copy of
the foregoing was mailed this
25TH day of July, 2013, to:

Original and 10 Copies

Mr. Jeff Derouen, Executive Director
Kentucky Public Service Commission
211 Sower Boulevard
P.O. Box 615
Frankfort, Kentucky 40602

Frank McAninch
1341 Ivan Godbey Rd.
Liberty, KY 42539

Complainant

By 
Robert Spragens, Jr.