LELAND R. HOWARD II Pardue Law Group PLLC 2303 Watterson Trail, Suite 101 Louisville, Kentucky 40299 Telephone: (502) 812-1111 Mobile: (502) 548-9618 Facsimile: (502) 812-1114 Email: <u>lelandrhoward@gmail.com</u> www.parduelawgroup.com



RECEIVED

July 17, 2019

JUL 2 2 2019

PUBLIC SERVICE COMMISSION

Kentucky Public Service Commission PO Box 613 211 Sower Blvd. Frankfort, KY 4602-0615

Re: Steven and Rebecca LeClair v. LG&E Case No. 2018-00373

Dear Ms. Pinson:

Enclosed for filing is an original copy of our Entry of Appearance as counsel for the Complainants and Our Motion for Extension of Time to Respond to Request for Information. Both are presented to you for filing with the Commission.

Please contact us if there are any questions concerning this filing.

Very Truly Yours,

Leland R. Howard II Of Counsel

Encls. Entry of Appearance Motion for Extension of Time

cc: Steve & Rebecca LeClair

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COMMONWEALTH OF KENTUCKY

JUL 2 2 2019

BEFORE THE PUBLIC SERVICE COMMISION

PUBLIC SERVICE COMMISSION

In the Matter of:

STEVEN AND REBECCA LECLAIR)	
COMPLAINANTS))	CASE NO.
V.		2018-00373
)	2010 000,0
LOUISVILLE GAS AND ELECTRIC CO.)	
DEFENDANT)	

ENTRY OF APPEARANCE AS COUNSEL FOR COMPLAINANTS

Leland Howard, Esq, hereby enters his appearance as counsel for Complainants, Steven and Rebecca LeClair, and hereby directs that all future pleadings, communications, Orders, etc. be

directed to him at the following address:

Leland Howard, Esq. Pardue Law Group 2303 Watterson Trail, Suite 101 Louisville, KY 40202 502-548-9618 lelandrhoward@gmail.com Date: July 17, 2019

Respectfully submitted,

PARDUE LAW GROUP

By:

Leland Howard, Esq. 2303 Watterson Trail, Suite 101 Louisville, KY 40299 502-548-9618 Louisville, KY 40299 <u>lelandrhoward@gmail.com</u> Counsel for Complainants

Certificate of Service

The undersigned hereby certifies that a true and accurate copy of the foregoing was served on this 17th day of July 2019 via U.S. Mail upon:

Allyson Sturgeon, Esq. LG&E 220 West Main Street Louisville, KY 40202 Counsel for Defendant

PARDUE LAW GROUP

By: Leland Howard, Esq.

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COMMONWEALTH OF KENTUCKY

JUL 2 2 2019

BEFORE THE PUBLIC SERVICE COMMISION

PUBLIC SERVICE COMMISSION

In the Matter of:

NO.
)373

MOTION FOR EXTENSION OF TIME TO RESPOND TO REQUEST FOR INFORMATION

Complainants, Steven and Rebecca LeClair, by counsel, hereby Move the Commission to grant Complainants' newly appearing Counsel of Record an Extension of Time in which to fully and completely respond to the Commission Staff's First Request for Information. Complainants request to and including an extension until August 31, 2019 in which to comply with the Request.

In support of this Motion, Complainants and counsel state that:

1. Complainants' counsel was just retained to assist in this matter as of July 17, 2019, and immediately contacted the Staff Attorney and reviewed the online docket and all pleadings. It will take counsel some time to become fully familiar with the facts and circumstances of the issues raised both in the Complaint and in Defendant's Response.

2. Complainant represented to both the Staff Attorney and to their counsel that he has previously attempted to file Responses to the Request for Information within an appropriate amount of time. However, unfortunately, Complainant did not keep a record of service or filing of same and it appears from speaking with the Staff Attorney and an initial review of the Commission Record, that the Response that Complainant attempted to file did not make it to the correct file or location. However, Complainant does have information responsive to the Request for Information and their counsel will make every effort to fully comply with the Request.

As a personal matter, undersigned counsel will be out of town beginning July 19,
 2019 through July 29, 2019.

4. A short delay in filing a Response to the Request for Information will not result in any additional prejudice to either party. In fact, allowing counsel adequate time to address the Request and become familiar with this matter will likely save the Commission, the Parties and all counsel additional time later in the proceeding.

WHEREFORE, Complainants request that the Commission grant an extension of time for responding to the First Request for Information to and including August 31, 2019.

Date: July 17, 2019

Respectfully submitted,

PARDUE LAW GROUP

By: <

Leland Howard, Esq. 2303 Watterson Trail, Suite 101 Louisville, KY 40299 502-548-9618 Louisville, KY 40299 <u>lelandrhoward@gmail.com</u> Counsel for Complainants

Certificate of Service

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Allyson Sturgeon, Esq. LG&E 220 West Main Street Louisville, KY 40202 Counsel for Defendant

PARDUE LAW GROUP

By: Leland Howard, Esq.