

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF THE)
MARTIN COUNTY WATER DISTRICT)
FOR ALTERNATIVE RATE ADJUSTMENT)
)

CASE NO. 2018-00017

MOTION TO ACCEPT LATE FILING

Comes the Martin County Water District (hereinafter District), by counsel, and moves the Public Service Commission (hereinafter Commission) for an Order, accepting the filing of the monthly submission due on the 15th of each month, out of time.

As grounds therefore, counsel’s legal assistant, Lesley Dempsey, was out of the office on Friday, November 15, 2019 and Monday, November 18, 2019. That she returned to the office today, Tuesday, November 19, 2019, and this filing is tendered forthwith.

The Affidavit of the undersigned is attached hereto and in support thereof.

Wherefore, counsel requests appropriate Orders of the Commission consistent with this Motion.



BRIAN CUMBO
COUNSEL FOR MARTIN COUNTY
WATER DISTRICT
P.O. BOX 1844
INEZ, KY 41224
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CERTIFICATE OF SERVICE

This will certify that a true and correct copy of the foregoing was mailed & emailed, postage paid, on this the 19th day of November, 2019, to the following:

Public Service Commission (*Via USPS*)
P.O. Box 615
Frankfort, KY 40602

Hon. Mary Varson Cromer (*Via Email only*)
Appalachian Citizens' Law Center, Inc.
317 Main Street
Whitesburg, KY 41858
mary@appalachianlawcenter.org

Hon. M. Todd Osterloh (*Via Email only*)
Hon. James Wilson Gardner
Sturgill, Turner, Barker & Moloney, PLLC
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BRIAN CUMBO

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AFFIDAVIT OF BRIAN CUMBO

Comes the Affiant, Brian Cumbo, after being duly sworn, and states as follows:

1. That I, Brian Cumbo, am an attorney licensed to practice law in the Commonwealth of Kentucky, whose business address is P.O. Box 1844, 86 West Main Street, Inez, Kentucky 41224.
2. That my legal assistant, Lesley Dempsey, was out of the office on November 15, 2019 and November 18, 2019.
3. That because she was out of the office, the filing due on the 15th could not be made.
4. That immediately upon her return to the office, the filing was tendered along with this Motion.

Further the Affiant saith naught.



 BRIAN CUMBO

STATE OF KENTUCKY)

COUNTY OF MARTIN)

SUBSCRIBED, ACKNOWLEDGED and SWORN TO before me by Brian Cumbo this
the 19th day of November, 2019.

My Commission Expires: September 18, 2022.


NOTARY PUBLIC, STATE AT LARGE