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Arizona Corporation Commission

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ARIZONA CORPORATION COMMISSION  
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**BEFORE THE ARIZONA CORPORATION COMMISSION**

In re the Matter of:  
SECURE RESOLUTIONS, INC., an  
Arizona Corporation;  
DOUGLAS COTTLE and KYLA COTTLE,  
HUSBAND AND WIFE,  
Respondent.

Docket No: S-20677A-09-0256

**EXPEDITED/EMERGENCY MOTION  
TO CONTINUE HEARING SET FOR  
FEBRUARY 8, 2010 AND FOR  
EXTENSION OF TIME TO  
EXCHANGE WITNESS LISTS AND  
EXHIBITS**

**Assigned to the Honorable Marc E. Stern**

**Respondents**, by and through undersigned Counsel, hereby requests on an expedited basis, a Continuance of the previously scheduled hearing set in this matter for February 8, 2010, and the deadlines for witness lists and exhibits to be exchanged for approximately thirty (30) to sixty (60) days. This represents Respondents first request for a continuance of either the final hearing date and/or the list of witnesses and exhibits to be exchanged.

This motion is being requested by newly obtained Counsel for Respondents who is filing a Notice of Appearance in this matter contemporaneously with this motion. Counsel has been retained for the sole purpose of finalizing this matter before the Commission. Counsel has discussed the matter with Paul Huynh, Counsel for the Commission. First, a meeting that was to take place on Monday January 4, 2010 between Mr. Huynh and the Cottle's was rescheduled

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1 for the following Wednesday, January 13, 2010 so that Counsels and the Cottle's can have a  
2 meaningful opportunity at resolving the matter short of a full hearing on the merits. Counsel  
3 asked Mr. Huynh if he would stipulate to a brief continuance of the matter so that newly  
4 obtained Counsel could familiarize himself with the case and try to reach a solution on the  
5 matter short of trial. Mr. Huynh did express ambivalence about a continuance and indicated  
6 that he would file a response to a motion to Continue. However, it must be noted to the  
7 Commission that it is a first continuance request, and it is not for any extended period of time,  
8 merely thirty to sixty days so that the Cottle's can be effectively represented should the matter  
9 not resolve short of a full hearing on the merits. It is expected that Counsels and the parties  
10 should be able to settle the matter. Moreover, Counsel avows to this Commission that the  
11 continuance request is neither for any unnecessary purpose, harassment, or unnecessary delay  
12 and is in the interests of justice.

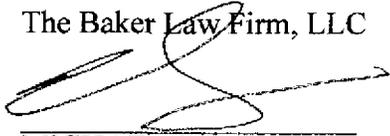
14 Finally, it is respectfully requested that an order on the motion to continue the hearing  
15 and the deadline for witnesses and exhibits exchange be made on an expedited basis as a  
16 deadline exists for such exchange this Friday, January 8, 2010, only three business days from  
17 the date of this motion. Under information and belief, exhibits and witness lists have yet to be  
18 provided to the Cottle's, and also under information and belief the Cottle's have approximately  
19 fifty (50) exhibits and/or witnesses to disclose, that Counsel needs to verify whether they are  
20 necessary so that cumulative and/or unnecessary witnesses and exhibits do not inundate the  
21 commission unnecessarily.

23 In conclusion, while ambivalence to a continuance may be understandable, the request is  
24 not unreasonable in light of the Respondents being able to afford an attorney that can finalize  
25 these matters before the Commission in a timely and prudent matter. As such, it is again

1 respectfully requested that the Motion to Continue Hearing be granted and that the commission  
2 extend the deadline for the exchange of witnesses and exhibits.

3 **RESPECTFULLY SUBMITTED THIS 5 DAY OF JANUARY, 2010.**

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5 The Baker Law Firm, LLC



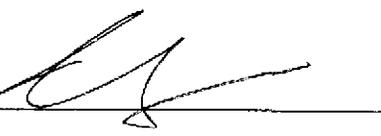
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7 **MICHAEL S BAKER**  
Attorney At Law

8 Original of the foregoing to be filed  
this 5 day of January 2010 with:

9 Docket Control  
10 Arizona Corporation Commission  
1200 W. Washington St.  
Phoenix, AZ 85007

11 Copy of the foregoing to be mailed/delivered  
this 5 day of January 2010 to:

12  
13 Phong (Paul) Huynh, Esq.  
14 Arizona Corporation Commission  
Securities Division  
1300 W. Washington St., Third Floor  
Phoenix, AZ 85007

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