

ORIGINAL



0000129482

BEFORE THE ARIZONA CORPORATION

RECEIVED

COMMISSIONERS

GARY PIERCE, Chairman
BOB STUMP
SANDRA D. KENNEDY
PAUL NEWMAN
BRENDA BURNS

2011 SEP -9 P 4: 09

AZ CORP COMMISSION
DOCKET CONTROL

Arizona Corporation Commission

DOCKETED

SEP 9 2011

DOCKETED BY [Signature]

IN THE MATTER OF THE APPLICATION OF)
MICHAEL W. SCHULTZ AND PAMELA J.)
SCHULTZ DBA RINCON CREEK WATER)
COMPANY, FOR APPROVAL OF SALE OF)
ASSETS AND TRANSFER CERTIFICATE OF)
CONVENIENCE AND NECESSITY.)

DOCKET NO. W-03783A-10-0172

MOTION FOR EXTENSION OF
BRIEFING DATES

William Shirley and Gretchen Shirley ("Transferees"/"Co-Applicants"), by and through their undersigned attorney, hereby move for an extension of the dates for filing Opening Briefs and Reply Briefs previously established by the Administrative Law Judge assigned to this proceeding in a Procedural Order issued August 11, 2011.

DISCUSSION

Due to a change in residence since the evidentiary hearing in this matter was conducted in December 2010, Transferees/Co-Applicants did not receive their copy of the August 11, 2011 Procedural Order until several days ago. Thereafter, on September 5, 2011, they spoke with undersigned counsel by telephone regarding his possible representation of them in connection with preparation of the Opening Brief and Reply Brief required of them under the Procedural Order; and, on September 6, 2011 they retained undersigned counsel for such purpose and any other matters relating to this proceeding.

Inasmuch as undersigned counsel (i) has pre-existing professional commitments which preclude him from doing any work on this matter between now and September 14, 2011, (ii) will be out-of-the country between September 15, 2011 – October 1, 2011 and (iii) will thereafter require some time to familiarize himself with the record in this proceeding and the legal issues to

LAWRENCE V. ROBERTSON, JR.
ATTORNEY AT LAW
P.O. Box 1448
Tubac, Arizona 85646
(520) 398-0411

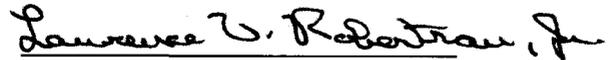
1 be briefed, Transferees/Co-Applicants request that the dates for filing Opening Briefs and Reply
2 Briefs in this proceeding be revised as follows:

<u>Brief</u>	<u>From</u>	<u>To</u>
Opening	September 16, 2011	October 31, 2011
Reply	October 7, 2011	November 21, 2011

3
4
5
6
7
8 In that regard, it is the understanding of undersigned counsel that counsel for the
9 Commission's Staff does not oppose the proposed changes in dates for the filing of briefs in this
10 matter.

11
12 Dated this 7th day of September 2011.

13
14 Respectfully submitted,

15 

16 Lawrence V. Robertson, Jr.
17 Attorney for William Shirley and Gretchen
Shirley, Transferees/Co-Applicants

18 The original and thirteen (13) copies of the
19 foregoing mailed this 7th day of September 2011 to:

20 Docket Control Division
21 Arizona Corporation Commission
22 1200 West Washington Street
Phoenix, Arizona 85007

23 A copy of the same served by e-mail or first
24 class mail this same date to:

25 Steven M. Olea, Director
26 Utilities Division
27 Arizona Corporation Commission
28 1200 West Washington
Phoenix, AZ 85007

LAWRENCE V. ROBERTSON, JR.
ATTORNEY AT LAW
P.O. Box 1448
Tubac, Arizona 85646
(520) 398-0411

1 Janice Alward, Chief Counsel
2 Ayesha Vohra
3 Legal Division
4 Arizona Corporation Commission
5 1200 West Washington Street
6 Phoenix, AZ 85007

7 Michael W. Schultz
8 Rincon Creek Water Company
9 1102 North Anita Avenue
10 Tucson, AZ 85705

11 William Shirley
12 Rincon Creek Ranch
13 8987 E. Tanque Verde Road, #309-213
14 Tucson, AZ 85749

15 
16 _____

17
18
19
20
21
22
23
24
25
26
27
28