



0000150288

BEFORE THE ARIZONA CORPORATION COMMISSION

COMMISSIONERS

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

ORIGINAL

In the Matter of:

Docket No. S-20867A-12-0459

TRI-CORE COMPANIES, LLC, an
Arizona limited liability company,

**MOTION TO CONTINUE
FEBRUARY 18, 2014, HEARING**

TRI-CORE MEXICO LAND
DEVELOPMENT, LLC, an Arizona
limited liability company,

TRI-CORE BUSINESS DEVELOPMENT,
LLC, an Arizona limited liability company,

ERC COMPACTORS, LLC, an Arizona
limited liability company,

(Assigned to Administrative Law Judge
Marc E. Stern)

ERC INVESTMENTS, LLC, an Arizona
limited liability company,

C&D CONSTRUCTION SERVICES,
INC., a Nevada corporation,

PANGAEA INVESTMENT GROUP,
LLC, an Arizona limited liability company,
d/b/a Arizona Investment Center,

JASON TODD MOGLER, an Arizona
resident,

BRIAN N. BUCKLEY and CHERYL
BARRETT BUCKLEY, husband and wife,

CASIMER POLANCHEK, an Arizona
resident,

NICOLE KORDOSKY, an Arizona
resident,

Respondents.

RECEIVED
2014 FEB 11 A 9:11
AZ CORPORATION COMMISSION
DOCKET OFFICE

Arizona Corporation Commission
DOCKETED

FEB 11 2014

DOCKETED BY

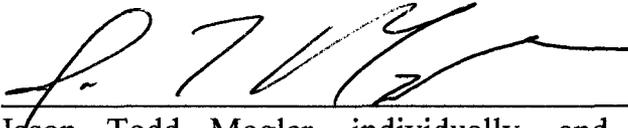
1
2 Respondents, TRI-CORE COMPANIES, LLC, TRI-CORE BUSINESS
3 DEVELOPMENT, LLC, and JASON TODD MOGLER (collectively, the "Respondents"),
4 through JASON TODD MOGLER, individually, and as manager of TRI-CORE
5 COMPANIES, LLC and TRI-CORE BUSINESS DEVELOPMENT, LLC, respectfully
6 request the Commission to continue the hearing date in this matter currently set to begin on
7 February 18, 2014, and continue through March 6, 2014, for a period of __45__ days, or
8 other such date that is convenient with the Court.

9 Former Counsel of record for Respondents withdrew on January 31, 2014, due to conflicts
10 of interest. Respondents require more time to proceed in this matter *pro per*.

11
12 I am respectfully asking the court to extend the defense side of the hearing for Tri-Core
13 Companies, Tri-Core Business Development and Jason Mogler for 45 days from Stacey L.
14 Luedtke final presentation date. The conflict with the previous attorney Bobby Thrasher as
15 left me at the 11th hour with little to no time to properly prepare. I am asking for only two
16 (2) days to present my defense after the 45 days from the conclusion of the States. I am
17 requesting this with full consideration to all parties involved in this hearing.

18
19 For the aforementioned reason, Respondents request the Commission to grant a partial
20 continuance of the hearing set to begin on February 18, 2014, for __45__ days, or other
21 date convenient to the Commission. This motion is made in good faith and is not intended
22 to cause any unnecessary delay.

1 Dated this 11th day of February, 2014.

2
3
4 By 

5 Jason Todd Mogler, individually, and as
6 Manager of Tri-Core Companies, LLC and Tri-
7 Core Business Development, LLC
8 8800 East Chaparral, Suite 270
9 Scottsdale, Arizona 85250
10 *Individual Respondent and Representative for*
11 *Corporate Respondents*

12 ORIGINAL AND 13 COPIES of the foregoing filed February 11th, 2014, with:

13 Docket Control
14 Arizona Corporation Commission
15 1200 West Washington Street
16 Phoenix, Arizona 85007

17 COPIES of the foregoing mailed February 11th, 2014, to:

18 Honorable Marc E. Stern
19 Administrative Law Judge
20 Arizona Corporation Commission / Hearing Division
21 1200 West Washington Street
22 Phoenix, Arizona 85007

23 Stacey L. Luedtke
24 1300 W. Washington, 3rd Floor
25 Phoenix, Arizona 85007

26 Irma Huerta, President
27 C&D Construction Services, Inc.
28 1520 Red Rock Street
Las Vegas, New Mexico 89146

Guy Quinn, Jr.
1129 Stonegate Ct.
Bartlett, Illinois 60103

ERC Compactors LLC

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

c/o ERC of Chicago, LLC
Attention: Guy Quinn, Jr., Manager
625-D Railroad Street
Montgomery, Illinois 60538

ERC Investments LLC
c/o ERC of Chicago, LLC
Attention: Guy Quinn, Jr., Manager
625-D Railroad Street
Montgomery, Illinois 60538

Paul Roshka, Esq.
Jennifer A. Stevens, Esq.
ROSHKA DeWULF & PATTEN, PLC
One Arizona Center
400 East Van Buren Street, Suite 800
Phoenix, Arizona 85004
