

**STATE OF NORTH CAROLINA
UTILITIES COMMISSION
RALEIGH**

DOCKET NO. W-1125, SUB 9

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

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|---|---|-----------------------|
| In the matter of |) | |
| Greater Kinnakeet Shores Home Owners, |) | |
| Inc. c/o Pat Weston P.O. Box 853, Avon, |) | |
| North Carolina 27915, |) | |
| |) | |
| Complainant, |) | MOTION TO EXTEND TIME |
| v. |) | TO FILE ANSWER |
| |) | |
| Outer Banks/Kinnakeet Associates, LLC, |) | |
| Respondent. |) | |

NOW COMES the Respondent, Outer Banks/Kinnakeet Associates, LLC pursuant to Rule R1-9(c) of the Rules of the North Carolina Utilities Commission moving to extend the time in which to file an answer the complaint herein by thirty (30) days to allow undersigned counsel sufficient time to investigate this matter and prepare an answer to the allegations set forth in the complaint. In support of this motion, undersigned counsel shows the following:

1. The Complainant filed the complaint herein on December 13, 2021;
2. Pursuant to the ORDER SERVING COMPLAINT, Respondent is directed to either satisfy the demands of Complainant or file an answer to the complaint on or before December 28, 2021;
3. Respondent retained undersigned counsel to represent Respondent in this matter on December 17, 2021;
4. The time in which to file an answer to the complaint herein has not lapsed;
5. The complaint herein makes numerous factual allegations which are alleged to have occurred between 1999 and 2021 which undersigned counsel must investigate before admitting or denying said factual allegations in Respondent's answer;
6. The complaint herein references numerous documents including permits, correspondence, orders, and pleadings in a separate action, which are not attached to the complaint and

which undersigned counsel must collect and review before admitting or denying the existence of or substance of the alleged documents;

7. Given the time span over which the factual allegations are alleged to have occurred, the number of documents referred to, and the disparate sources from which the documents must be obtained, undersigned counsel reasonably requires an extension of thirty (30) days to allow sufficient time to investigate this matter and effectively represent the Respondent in the filing of an accurate answer to the complaint herein; and
8. It is in the interest of justice and judicial economy that undersigned counsel be granted enough time to investigate and accurately respond to the allegations made in the complaint.

WHEREFORE, Respondent respectfully prays the Commission to extend the time in which to file an answer to the complaint herein by thirty (30) days to allow undersigned counsel sufficient time to investigate and accurately respond to Complainant's allegations.

This the 20th day of December, 2021

Law Office of C. Sean Yacobi, PLLC

By _____

C. Sean Yacobi
Attorney for Respondent
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CERTIFICATE OF SERVICE

I hereby certify that the foregoing document entitled MOTION TO EXTEND TIME TO FILE ANSWER has been served on the parties to this action by:

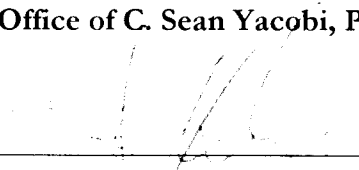
- () Depositing a copy hereof, postage prepaid, in the United States Mail, properly addressed to each said party or his/her/their/its attorney.
- (-) Electronic transmission to every party or his/her/their/its attorney, with delivery via facsimile, e-mail or other electronic address made to the facsimile, e-mail or electronic addresses shown herein below.

PARTY SERVED:

Edward S. Finley, Jr.
2024 White oak Road
Raleigh, NC 27608
edfinley98@aol.com

This the 20th day of December, 2021

Law Office of C. Sean Yacobi, PLLC

By: 

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