

STATE OF NORTH CAROLINA
UTILITIES COMMISSION
RALEIGH

DOCKET NO. W-1125, SUB 9

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

In the matter of)	
Greater Kinnakeet Shores Home Owners,)	
Inc. c/o Pat Weston P.O. Box 853, Avon,)	
North Carolina 27915,)	
)	
Complainant,)	SECOND MOTION TO EXTEND
v.)	TIME 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 complete his investigation this matter and complete the preparation 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 was 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. On December 20, 2021, Respondent moved to extend the time in which to respond to the complaint to and through January 27, 2022, which motion was granted.
5. The extended time in which to respond to the complaint has not lapsed.
6. The complaint herein makes numerous factual allegations which are alleged to have occurred between 1999 and 2021 which undersigned counsel is continuing to investigate in preparation of admitting or denying said factual allegations in Respondent's answer;

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Jan 25 2022

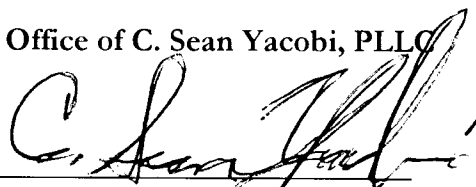
7. The complaint herein references numerous documents including permits, correspondence, orders, and pleadings in a separate action, which are not attached to the complaint and which undersigned counsel is continuing to collect and review in preparation to admitting or denying the existence of or substance of the alleged documents;
8. 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 additional extension of thirty (30) days to allow sufficient time to complete the investigation of this matter and to prepare accurate answer to the complaint herein; and
9. It is in the interest of justice and judicial economy that undersigned counsel be allowed an additional thirty (30) days in which to complete this 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 an additional thirty (30) days to February 26, 2022 to allow undersigned counsel sufficient time to investigate and accurately respond to Complainant's allegations.

This the 25th day of January, 2022

Law Office of C. Sean Yacobi, PLLC

By



C. Sean Yacobi
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CERTIFICATE OF SERVICE

I hereby certify that the foregoing document entitled SECOND 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 25th day of January, 2022

Law Office of C. Sean Yacobi, PLLC

By: 

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