

STATE OF NORTH CAROLINA
UTILITIES COMMISSION
RALEIGH

DOCKET NO. W-1297, SUB 14

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

In the Matter of)	
)	
Pinnacle Bank, as successor by merger with)	
Bank of North Carolina,)	RESPONDENT HARKERS ISLAND SEWER
Complainant,)	COMPANY'S MOTION FOR
)	EXTENSION OF TIME TO
v.)	RESPOND TO COMPLAINT
)	
Harkers Island Sewer Company,)	
Respondent.)	

NOW COMES Respondent Harkers Island Sewer Company ("HISCO"), by and through counsel, and respectfully requests that the Commission grant it an extension of time to respond to Complainant's Complaint, through and including June 4, 2019. In support, Respondent HISCO says as follows:

1. Complainant filed its Complaint on May 2, 2019.
2. On May 3, 2019, the Commission issued an Order Serving Complaint directing Respondent HISCO to either satisfy the demands of Complainant or to file an Answer on or before May 24, 2019.
3. Respondent HISCO does not have in-house counsel, or regularly retained counsel. The undersigned first was contacted and retained by Respondent HISCO regarding this matter only two or three days ago. Counsel for Respondent HISCO first received, and only had the chance to briefly review, a copy of the Complaint yesterday.
4. Counsel for Respondent HISCO needs additional time to gather information, meet with Respondent, assess legal issues and otherwise competently and fully respond to the allegations contained in the Complaint. Counsel for Respondent respectfully points out to the Commission that Complainant's Complaint contains 140 pages of text and exhibits, which alone will require significant time to review.

5. This Motion is timely filed on or before the current deadline for filing a response.

6. Yesterday, the undersigned Counsel's office communicated with Complainant's counsel; as a result, it is the understanding of the undersigned Counsel that Complainant's Counsel does not oppose this request for extension of time.

WHEREFORE, Respondent HISCO respectfully requests an extension of time to respond to Complainant's Complaint up to and including June 4, 2019.

This the 24th day of May, 2019.

Electronically submitted

/s/ I. Clark Wright, Jr.

I. CLARK WRIGHT, JR.

N.C. Bar No. 11163

For the Firm of

DAVIS HARTMAN WRIGHT PLLC

209 Pollock Street

New Bern, NC 28560

Telephone: (252) 514-2828

Facsimile: (252) 514-9878

Email: icw@dhwlegal.com

Attorneys for Respondent HISCO

CERTIFICATE OF SERVICE

I certify that I have this day served a copy of the foregoing MOTION OF RESPONDENT HARKERS ISLAND SEWER COMPANY FOR EXTENSION OF TIME TO RESPOND TO COMPLAINT on the parties of record by electronic mail or by United States first class mail, postage prepaid, properly addressed to the following:

Alan B. Powell
Roberson Haworth & Reese, PLLC
300 N. Main Street, Suite 300
Post Office Box 1550
High Point, NC 27261
Email: apowell@rhrlaw.com

Andrew D. Irby
Roberson Haworth & Reese, PLLC
300 N. Main Street, Suite 300
Post Office Box 1550
High Point, NC 27261
Email: airby@rhrlaw.com

Christopher C. Finan
Roberson Haworth & Reese, PLLC
300 N. Main Street, Suite 300
Post Office Box 1550
High Point, NC 27261
Email: cfinan@rhrlaw.com

This the 24th day of May, 2019.

Electronically submitted

/s/ I. Clark Wright, Jr.

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New Bern, NC 28560

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Facsimile: (252) 514-9878

Email: icw@dhwlegal.com

Attorneys for Respondent HISCO