

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

Staff of the Missouri Public Service Commission)	
of the State of Missouri,)	
)	
Complainant,)	
v.)	Case No. TC-2009-0407
)	
FamilyTel of Missouri, L.L.C.)	
)	
Respondent.)	

MOTION FOR EXTENSION OF TIME

COMES NOW FamilyTel of Missouri L.L.C. (FamilyTel or Company) and pursuant to 4 CSR 240-2.050(3)(A) requests an extension of time within which to file an answer in the referenced cause. In support thereof, FamilyTel submits the following:

1. In its Notice of Complaint and Order dated May 13, 2009, the Commission directed that an answer to Staff's complaint be filed on or before June 12, 2009.
2. This matter has just recently been assigned to the undersigned counsel, who is facing other pressing deadlines, and in consequence, there has not been sufficient time to adequately prepare an answer or other response to the complaint. FamilyTel respectfully requests an additional fourteen days, up to and including June 26, 2009 to answer or otherwise respond to Staff's complaint.
3. The extension sought will not prejudice any party to the action and will not unfairly delay the disposition of this cause.
4. The undersigned is authorized to state that Staff counsel has no objection to the requested extension.

WHEREFORE, FamilyTel of Missouri L.L.C. respectfully requests the Commission to issue an Order extending the time within which it may file an answer or other response to Staff's complaint by fourteen days, up to and including June 26, 2009.

Respectfully submitted,

NEWMAN, COMLEY & RUTH P.C.

By: /s/ Mark W. Comley
Mark W. Comley #28847
601 Monroe Street, Suite 301
P.O. Box 537
Jefferson City, MO 65102
Telephone: (573) 634-2266
Facsimile: (573) 636-3306
comleym@ncrpc.com
Attorneys for FamilyTel of Missouri, L.L.C.

Certificate of Service

I hereby certify that a true and correct copy of the above and foregoing document was sent via e-mail on this 12th day of June, 2009, to Jennifer Hernandez, Legal Counsel, at jennifer.hernandez@psc.mo.gov; and Office of Public Counsel at opcservice@ded.mo.gov.

/s/ Mark W. Comley