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Mr. Dale Hardy Roberts Secretary/Chief Administrative Law Judge Missouri Public Service Commission P. O. Box 360 Jefferson City, MO 65102

FILED²

NOV 1 9 2001

Re:

EUGENE E. ANDERECK

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CRAIG S. JOHNSON

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BEVERLY J. FIGG

WILLIAM S. LEWIS VICTOR S. SCOTT

COREY K. HERRON

GEORGE M. JOHNSON

JACK PEACE

Case No. TO-2002-185

Missouri Public Service Commission

Dear Judge Roberts:

Enclosed for filing please find an original and eight (8) copies of MITG's Motion for Extension of Time to file responses to the following:

- 1. Reply of Southwestern Bell Telephone Company, Southwestern Bell Texas, Inc. and Southwestern Bell Telephone LP to Application to Intervene;
- 2. Response and Request for Hearing of the Missouri Independent Telephone Company Group;
- 3. Office of Public Counsel's Response in Request for a Hearing;
- 4. Application to Intervene, Response and Request for Hearing of the Small Telephone Company Group; and
- 5. Staff's Response to Application.

November 19, 2001 Page Two

Thank you for seeing this filed.

Sincerely,

Craig S. Johnson

CSJ:tr Enc.

cc:

Missouri Public Service Commission

Office of Public Counsel

Paul G. Lane Leo J. Bub

W.R. England, III

BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI



			140 a T 9 700 t
In the Matter of the Application of)		
Southwestern Bell Telephone Company)	Case No. TO-2002-185	Missouri Public Service Commission
to Transfer Property and Ownership of)		Service Commission
Stock Pursuant to Section 392.200 RSMO.)		

MOTION FOR EXTENSION OF TIME

Comes now the Missouri Independent Telephone Company Group (MITG) and in response to the Reply of Southwestern Bell Telephone Company, Southwestern Bell Texas Inc. and Southwestern Bell Telephone LP to Application to Intervene, Response and Request for Hearing of the Missouri Independent Telephone Company Group; Office of Public Counsels Response in Request for a Hearing; Application to Intervene, Response, and Request for Hearing of the Small Telephone Company Group; and Staff's Response to Application, and hereby request an extension of time to respond to such reply. In support of this Motion, the MITG states as follows:

- 1. The Southwestern Bell Companies raise new points or issues pertaining to the interplay between contract law and legislative/administrative law that were not addressed in the MITG's Application to Intervene. In addition these companies have attached over 25 pages of additional documentation that is very difficult to read and very time consuming to review.
- 2. The Southwestern Bell Telephone Companies certify that their Reply was mailed on November 8, 2001, but the MITG did not receive the Reply of the Southwestern Bell Companies until November 14, 2001. Pursuant to 4CSR 240-2.080(16), the MITG must respond within ten days from the date of filing unless otherwise ordered by the Commission. Given the six days that it took for the Reply to be delivered, the MITG was left with four days in which to respond to. Four days is insufficient time to review the Reply of the Southwestern Bell



Companies, conduct research on the new issues, and provide an informative response for this Commissions review.

The MITG respectfully request this Commission grant the MITG an extension of two weeks in which to respond to the Reply of the Southwestern Bell Companies.

ANDERECK, EVANS, MILNE, PEACE & JOHNSON, L.L.C.

Lisa Cole Chase

MO Bat No. 51502

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ATTORNEYS FOR MISSOURI INDEPENDENT TELEPHONE COMPANY GROUP

CERTIFICATE OF SERVICE

The undersigned does hereby certify that a true and accurate copy of the foregoing was mailed, U.S. Mail, postage pre-paid, this _____ day of November, 2001, to all parties of record.

Lisa Cole Chase