BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

Alma Communications Company d/b/a Alma)
Telephone Company, Chariton Valley Tele-)
Phone Corporation, Chariton Valley Telecom)
Corporation, Choctaw Telephone Company,)
Mid-Missouri Telephone Company, a corporate)
division of Otelco, Inc., and MoKAN DIAL,)
Inc.,)
Complainants,))
VS.	Case No. TO-2012-0035
Halo Wireless, Inc., and Southwestern Bell Telephone Company, dba AT&T Missouri,	
Respondents.))

Motion to Reactivate Case, and to Require Responses to the Application

Come now Complainants, and for their motion to Reactivate this case to require responses to Complainants' Application for Rejection, and state as follows:

- 1. Complainants' Application for Rejection was filed August 1, 2011.
- 2. Respondent Southwestern Bell Telephone Company d/b/a AT&T Missouri was served with process on August 4, 2011.

- 3. Respondent Halo Wireless Inc. was served with process on August 4, 2011, and again on August 5, 2011.
- 4. On August 12, 2011, Respondent Halo Wireless filed a suggestion of bankruptcy indicating it had filed bankruptcy on August 8, 2011.
- 5. On August 19, 2011 Respondent Halo Wireless filed a notice of removal of this case to the United States District Court for the Western District of Missouri.
- 6. On October 26, 2011 the United States Bankruptcy Court for the Eastern District of Texas, Sherman Division, entered an Order holding that the automatic bankruptcy stay imposed by 11 USC 362 is not applicable to this MoPSC proceeding, and that this proceeding may be advance to a conclusion and decision. See the Attached Order.
- 7. On December 29, 2011 this Commission received and docketed herein the December 21, 2011 Order of the United States District Court for the Western District of Missouri remanding this proceeding, as had been removed, back to the Commission.
- 8. There is no reason for further delay, and the Commission should reactivate this case by directing Respondents Southwestern Bell Telephone Company d/b/a AT&T Missouri and Halo Wireless Inc. to file answers or other

appropriate responsive motions to the Application for Rejection on or before January 27, 2012.

Respectfully submitted,

/s/Craig S. Johnson Craig S. Johnson Mo Bar # 28179 Johnson & Sporleder, LLP 304 E. High St., Suite 200 P.O. Box 1670 Jefferson City, MO 65102 (573) 659-8734 (573) 761-3587 FAX cj@cjaslaw.com

Certificate of Service

I hereby certify that a true and correct copy of the above and foregoing document was electronically mailed, this 4th day of January, 2012 to:

General Counsel
Missouri Public Service Commission
gencounsel@psc.mo.gov

Lewis Mills Office of Public Counsel lewis.mills@ded.mo.gov

Louis A. Huber, III Schlee, Huber, McMullen & Krause, PC lhuber@schleehuber.com

Steven Thomas McGuire, Craddock & Strother, PC sthomas@mcslaw.com

W. Scott McCollough McCollough Henry PC wsmc@dotlaw.biz

W.R.England Brydon Swearingen & England trip@brydonlaw.com

Leo Bub AT&T Missouri leo.bub@att.com

> /s/ Craig S. Johnson Craig S. Johnson