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October 11, 2002

FILED³

OCT 11 2002

Missouri Public
Service Commission

The Honorable Dale Hardy Roberts
Secretary/Chief Regulatory Law Judge
Missouri Public Service Commission
P.O. Box 360
Jefferson City, MO 65102-0360

Re: Tari Christ, d/b/a ANJ Communications, et al. v. Southwestern Bell Telephone Company,
L.P., d/b/a Southwestern Bell Telephone Company, et al.
Case No. TC-2003-0066

Dear Judge Roberts:

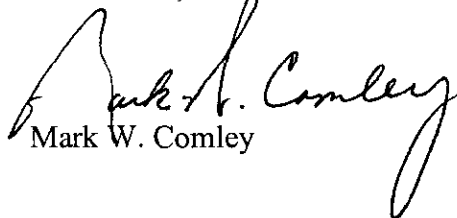
Please find enclosed for filing in the referenced matter the original and five copies of a Motion for Extension of Time to File Response to Respondents' Answers and Motions to Dismiss.

Please contact me if you have any questions regarding this filing. Thank you.

Very truly yours,

NEWMAN, COMLEY & RUTH P.C.

By:


Mark W. Comley

MWC:ab

Enclosure

cc: Office of Public Counsel
General Counsel's Office
Paul H. Gardner
Lisa Creighton Hendricks
Kenneth A. Schiffman
Leo J. Bub
Larry W. Dority

FILED³
OCT 11 2002
Missouri Public
Service Commission

Case No. TC-2003-0066

Southwestern Bell Telephone Company, L.P., d/b/a
Southwestern Bell Telephone Company,
Sprint Missouri, Inc., d/b/a Sprint, and
GTE Midwest Incorporated, d/b/a Verizon Midwest,

**MOTION FOR EXTENSION OF TIME TO FILE
RESPONSE TO RESPONDENTS' ANSWERS AND MOTIONS TO DISMISS**

Come now the above named Complainants, by and through their attorneys of record, and pursuant to 4 CSR 240-2.050 (3) and 4 CSR 240-2.080(16) respectfully request an extension of time to respond to the Answers and Motions to Dismiss filed by the Respondents in the captioned matter. In support thereof, Complainants state the following to the Commission:

3, 2002, the Commission issued its Notice of Complaint directing the Respondents to file responses thereto within thirty days.

2. All the Respondents have filed with the Commission their Answers and Motions to Dismiss, and pursuant to 4 CSR 240-2080(16) Complainants' response to these pleadings is due no later than Monday, October 14, 2002, or the next business day.

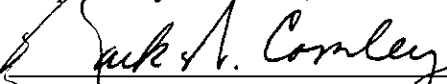
3. The Respondents have contended that the complaint should be dismissed on grounds including that: 1) it is an impermissible collateral attack on their payphone rates; 2) the "filed rate doctrine" bars the complaint; 3) there are in insufficient number of complainants; 4) it involves retroactive ratemaking.

4. Complainants submit that the issues raised by the Respondents are sufficiently complex that more time than the ten days allowed for response by 4CSR 240-2.080(16) is justified. Complainants request another four days, up to and including, October 18, 2002 within which to file their response.

5. Complainants' request for additional time is not for purposes of delay of this cause, but rather for purposes of a full and fair opportunity to research the issues raised by the Respondents and prepare an appropriate response.

WHEREFORE prays the Commission grant an extension of time of four days, up to and including October 18, 2002, for the filing of a response to the Respondents' Answers and Motions to Dismiss.

Respectfully submitted,



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Attorneys for Complainants

CERTIFICATE OF SERVICE

I hereby certify that on this 11th day of October, 2002, a true and correct copy of the above and foregoing document was sent by U.S. Mail, postage prepaid, or hand delivery, to:

Office of Public Counsel
P.O. Box 7800
Jefferson City, MO 65102-7800

General Counsel's Office
P.O. Box 360
Jefferson City, MO 65102

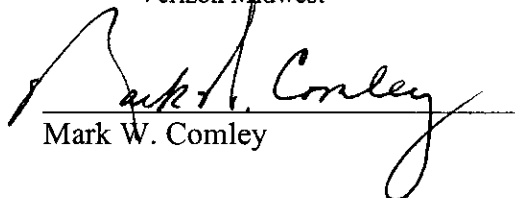
and by electronic mail and U.S. Mail, postage prepaid, to:

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