

ORIGINAL

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WESLEY R. PARSONS

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March 30, 1998

Ms. Blanca Bayó, Director  
Public Service Commission  
Division of Records and Reporting  
Room 110, Easley Building  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850

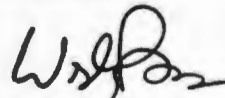
ATC v. TSI  
Docket No.: 951232-TI

Dear Ms. Bayó:

Enclosed for filing with the Public Service Commission is an original and fifteen copies of TSI's Agreed Motion for Enlargement of Time to Serve Opposition to Transcall's Motion to Compel Answers to Interrogatories.

Also enclosed is an additional copy of the filing, and a self-addressed stamped envelope. Please file-stamp and return the copy in the envelope.

Sincerely,



Wesley R. Parsons

ACK 1  
AFA 3  
APP \_\_\_\_\_  
CAF \_\_\_\_\_  
CMU 2  
    WRP/crm  
CTR Enclosures  
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FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER - DATE

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FPSC-RECORDS/REPORTING

ORIGINAL

BEFORE THE STAFF OF THE FLORIDA PUBLIC SERVICE COMMISSION

DOCKET NO. 951232-TI  
FILED: October 17, 1995

In Re: Dade County Circuit Court referral of )  
certain issues in Case No. 92-11654 CA 11 )  
(Transcall America, Inc. vs. Telecommunications )  
Services, Inc. and Telecommunications Services, )  
Inc. vs. Transcall America, Inc. and Advanced )  
Telecommunications Corp.) that are within the )  
Commission's jurisdiction. )  
\_\_\_\_\_ )

**TSI'S AGREED MOTION FOR ENLARGEMENT OF TIME TO SERVE  
OPPOSITION TO TRANSCALL'S MOTION TO COMPEL  
ANSWERS TO INTERROGATORIES**

Defendant, Telecommunication Services, Inc. ("TSI"), moves for an enlargement of time on an agreed basis to respond to the Motion to Compel Answers to Interrogatories of Plaintiff, Transcall America, Inc. ("Transcall"). The grounds for this motion are:

1. Transcall served its Motion to Compel Answers to Interrogatories on March 19, 1998.
2. During the week of March 23, 1998, TSI's attorney was involved in taking the depositions of Transcall witnesses, and producing documents to Transcall, for four out of five available work days, and was unavailable for other reasons the weekend of March 28 and 29, 1998. Accordingly, TSI's attorney has not had time to frame an opposition to the motion. The opposition is due to be served on March 31, 1998.

3. TSI's attorney has consulted with Transcall's attorney, and they have agreed

DOCUMENT NUMBER - DATE

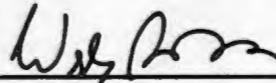
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that TSI will serve its opposition on Transcall and the Commission no later than April 6, 1998.

4. Therefore, TSI requests an enlargement of time to serve its opposition to Transcall's Motion to Compel Answers to Interrogatories through April 6, 1998.

ADORNO & ZEDER, P.A.



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Attorneys for Defendant/Counterclaimant/Third  
Party Plaintiff, Telecommunications Services,  
Inc.

**CERTIFICATE OF SERVICE**

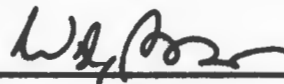
I HEREBY CERTIFY that a true and correct copy of the foregoing was sent via U.S.

Mail this 30 day of March, 1998 to:

Albert T. Gimbel  
Messer, Caparello & Self, P.A.  
215 South Monroe Street, Suite 701  
Tallahassee, Florida 32302-1878

Beth Keating  
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Regulatory Analyst Supervisor  
Florida Public Service Commission  
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\_\_\_\_\_

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