

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

Docket No.: 050257

In re: Complaint by BellSouth )
Telecommunications, Inc. Regarding )
The Operation of a Telecommunications )
Company by Miami-Dade County in )
Violation of Florida Statutes and )
Commission Rules )
\_\_\_\_\_)

MOTION FOR EXTENSION OF TIME

Miami-Dade County (the "County"), hereby files this Motion for Extension of Time in the above styled matter, Docket No. 050257, and in support of its Motion states:

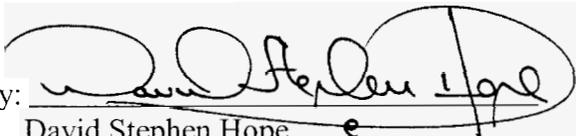
- 1. BellSouth Telecommunications, Inc. ("BellSouth") filed its Complaint with the Florida Public Service Commission (the "Commission") on April 13, 2005. The County received a courtesy copy of the Complaint from BellSouth on April 14, 2005. Although the County has not received service of the Complaint from the Commission as of the date of this Motion, with proper service the County's answer would have been due on or before May 4, 2005.
2. Given undersigned counsel must file an appellate brief in the matter of Brad Hinman and Brad Hinman, Inc. v. Miami-Dade County, Fla., No. 3D04-2769 (Fla. 3d DCA Oct. 29, 2004), in the Third District Court of Appeal of Florida on or before May 3, 2005, and will be in Seattle, Washington for the County from April 30, 2005 until May 5, 2005, the County requires an additional twenty (20) days to file its Answer.
3. Undersigned counsel has conferred with Sharon R. Liebman, Esq. of BellSouth, and BellSouth agrees to this twenty (20) day extension of time.
4. This motion is filed in good faith and is not dilatory.

DOCUMENT NUMBER-DATE

**WHEREFORE**, Miami-Dade County respectfully requests this Commission grant the County twenty (20) days up to and including May 24, 2004 within which to file its Answer.

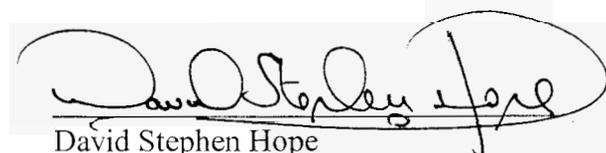
Respectfully submitted,

ROBERT A. GINSBURG  
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Stephen P. Clark Center  
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By:   
David Stephen Hope  
Assistant County Attorney

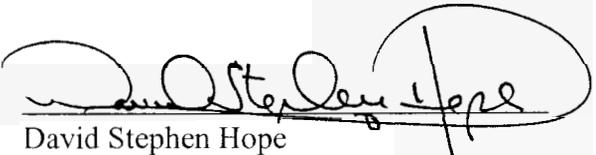
**CERTIFICATE OF CONSULTATION WITH COUNSEL**

I HEREBY CERTIFY that undersigned counsel has spoken to Sharon R. Liebman, Esq., counsel for BellSouth, and counsel for BellSouth has no objection to the County's Motion for Extension of Time.

  
David Stephen Hope  
Assistant County Attorney

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing was mailed this *29th* day of April, 2005, to: *Nancy B White, Esq.* and *Sharon R. Liebman, Esq.*, c/o Nancy H. Sims, BellSouth Telecommunications, Inc., 150 South Monroe Street, Suite 400, Tallahassee, Florida, 32301; and *R. Douglas Lackey, Esq.*, BellSouth Telecommunications, Inc., 675 West Peachtree Street, N.E., Suite 4300, Atlanta, Georgia 30375.

A handwritten signature in black ink, appearing to read "David Stephen Hope", is written over a light gray rectangular background. The signature is fluid and cursive, with a large loop at the end.

David Stephen Hope  
Assistant County Attorney