

Matilda Sanders

From: Woods, Vickie [Vickie.Woods2@bellsouth.com]
Sent: Wednesday, December 20, 2006 4:23 PM
To: Filings@psc.state.fl.us
Subject: 060684-TP BellSouth's Unopposed Motion for Extension of Time
Importance: High
Attachments: 060684-T.pdf

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OTH _____

- A. Vickie Woods
Legal Secretary to James Meza III and Manuel A. Gurdian
BellSouth Telecommunications, Inc.
150 South Monroe Street
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Tallahassee, Florida 32301
(305) 347-5560
vickie.woods2@bellsouth.com
- B. Docket No.: 060684-TP Complaint and Petition for Declaratory Relief of Litestream Holdings, LLC against BellSouth / Telecommunications, Inc.
- C. BellSouth Telecommunications, Inc.
on behalf of Manuel A. Gurdian.
- D. 4 pages total (includes letter, certificate of service and pleading)
- E. BellSouth Telecommunications, Inc.'s Unopposed Motion for Extension of Time

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12/20/2006

DOCUMENT NUMBER-DATE

11639 DEC 20 06

FPSC-COMMISSION CLERK

Manuel A. Gurdian
Attorney

BellSouth Telecommunications, Inc.
150 South Monroe Street
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ORIGINAL

December 20, 2006

Mrs. Blanca S. Bayó
Division of the Commission Clerk and
Administrative Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

**Re: Docket No.: 060684-TP Complaint and Petition for Declaratory Relief
of Lifestream Holdings, LLC against BellSouth Telecommunications, Inc.**

Dear Ms. Bayó:

Enclosed is BellSouth's Unopposed Motion for Extension of Time, which we ask
that you file in the captioned docket.

Copies have been served to the parties shown on the attached Certificate of
Service.

Sincerely,



Manuel A. Gurdian

Enclosure

cc: All Parties of Record
Jerry D. Hendrix
James Meza III
E. Earl Edenfield, Jr.

DOCUMENT NUMBER-DATE

11639 DEC 20 06

FPSC-COMMISSION CLERK

CERTIFICATE OF SERVICE
Docket No. 060684-TP

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via Electronic Mail and First Class U. S. Mail this 20th day of December, 2006 to the following:

Jason Fudge
Staff Counsel
Florida Public Service
Commission
Division of Legal Services
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850
jfudge@psc.state.fl.us

Gray Robinson Law Firm
Gary Resnick
401 East Las Olas Blvd.
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Litestream Holdings, LLC
500 South Australian Avenue
Suite 120
West Palm Beach, FL 33401-6235
Phone: (561) 659-5400
Fax: (561) 659-5671
sally@rhodesholdings.net



Manuel A. Gurdian

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In the Matter of:) Complaint and Petition for Declaratory Relief of) Litestream Holdings, LLC against BellSouth) Telecommunications, Inc.)	Docket No. 060684-TP Filed: December 20, 2006
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BELLSOUTH'S UNOPPOSED MOTION FOR EXTENSION OF TIME

BellSouth Telecommunications, Inc. ("BellSouth") asks the Florida Public Service Commission ("Commission") for an extension of time in which to file its response to the *Amended* Complaint and Petition for Declaratory Relief filed by Litestream Holdings, LLC ("Litestream"). In support of this Motion, BellSouth states the following:

1. On December 7, 2006, Litestream filed a Motion to Amend Complaint and Opposition to Request to Dismiss and *Amended* Complaint and Petition for Declaratory Relief ("Amended Complaint") against BellSouth.
2. On December 14, 2006, pursuant to Order No.: PSC-06-1033-PCO-TP, the Commission granted Litestream's Motion to Amend Complaint. In addition, pursuant to the Order, BellSouth was required to respond to the Amended Complaint by December 21, 2006.
3. Due to the holiday season and other pending litigation matters, BellSouth needs additional time to prepare an appropriate response to the Amended Complaint.
4. BellSouth seeks through and including January 4, 2007 in which to file a response to the Amended Complaint.
5. Counsel has contacted counsel for Litestream and informs the Commission that Litestream's counsel has no objection to the requested extension.
6. No party would be negatively impacted by the Commission granting BellSouth's requested extension. Further, there is currently no procedural schedule in place to be impacted.

11639-06

WHEREFORE, BellSouth respectfully requests an extension of time through and including January 4, 2007 in which to file a response to the Amended Complaint.

Respectfully submitted this 20th day of December, 2006.

BELLSOUTH TELECOMMUNICATIONS, INC.



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