

ORIGINAL

Legal Department

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April 14, 1998

Mrs. Blanca S. Bayó  
Director, Division of Records and Reporting  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850

**Re: Docket No. 980119-TP (Supra Complaint)**

Dear Ms. Bayó:

Enclosed is an original and fifteen copies of BellSouth Telecommunications, Inc.'s Motion to Strike Supra Telecommunications and Information Systems, Inc.'s Amended Direct Testimony of Bradford Hamilton, which we ask that you file in the captioned docket.

A copy of this letter is enclosed. Please mark it to indicate that the original was filed and return the copy to me. Copies have been served to the parties shown on the attached Certificate of Service.

Sincerely,

*Nancy B. White*  
Nancy B. White (bw)

ACK \_\_\_\_\_

AFA \_\_\_\_\_

Enclosures

APP \_\_\_\_\_

CAF \_\_\_\_\_

cc: All parties of record

CMU \_\_\_\_\_

*Swanni* A. M. Lombardo

CTR \_\_\_\_\_

R. G. Beatty

EAG \_\_\_\_\_

William J. Ellenberg II

LEG 2 \_\_\_\_\_

LIN 3 \_\_\_\_\_

QPC \_\_\_\_\_

RCH \_\_\_\_\_

SEC 1 \_\_\_\_\_

WAS \_\_\_\_\_

OTH \_\_\_\_\_

DOCUMENT NUMBER-DATE

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FPSC-RECORDS/REPORTING

**CERTIFICATE OF SERVICE**  
**Docket No. 980119-TP**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served  
by Federal Express this 14th day of April, 1998 to the following:

Beth Keating  
Legal Counsel  
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Tallahassee, FL 32399-0850

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Nancy B. White (for)

ORIGINAL

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Complaint of Supra Telecommunications ) Docket No.: 980119-TP  
and Information Systems, Inc., Against )  
BellSouth Telecommunications, Inc. )  
\_\_\_\_\_ ) Filed: April 14, 1998

**BELLSOUTH TELECOMMUNICATIONS, INC.'S  
MOTION TO STRIKE SUPRA'S  
AMENDED DIRECT TESTIMONY OF BRADFORD HAMILTON**

BellSouth Telecommunications, Inc., ("BellSouth"), hereby files, pursuant to Rule 25-22.037(2)(b), Florida Administrative Code, its Motion to Strike Supra Telecommunications and Information Systems, Inc.'s ("Supra") Amended Direct Testimony Of Bradford Hamilton and, in support thereof, states the following:

1. Direct testimony in this matter was originally scheduled for filing on March 19, 1998. Supra requested an extension of that filing date to April 8, 1998, with a concomitant extension for the filing of rebuttal testimony to April 15, 1998. BellSouth agreed to this extension. On April 8, 1998, Supra filed amended direct testimony of Messrs. Reinke and Ramos. On April 9, 1998, Supra filed amended direct testimony of Bradford Hamilton, along with a Motion for Leave to File Mr. Hamilton's Amended Direct Testimony.

2. In its Motion, Supra infers that BellSouth agreed to the April 9th filing of Mr. Hamilton's direct testimony. This is not true. As noted above, BellSouth agreed to an extension until April 8th for Supra to file all amended direct testimony. Moreover, Mr. Hamilton's testimony has doubled in size from his original testimony.

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STATE OF FLORIDA PUBLIC SERVICE COMMISSION

3. BellSouth avers that Mr. Hamilton's amended direct testimony should be stricken as out of time. In the alternative, and only in the event this testimony is not stricken, BellSouth moves that the hearing date in this matter be extended.

WHEREFORE, BellSouth respectfully requests the Commission to strike Supra's Amended Direct Testimony of Bradford Hamilton as out of time.

Respectfully submitted this 14th day of April, 1998.

BELLSOUTH TELECOMMUNICATIONS, INC.



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