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WESLEY R. PARSONS

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September 10, 1998

Via Federal Express

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 are an original and fifteen copies of TSI's Agreed Motion for Enlargement of Time to File Post-Hearing Memoranda.

Also enclosed is an additional copy to be file-stamped and returned to us in the enclosed self-addressed stamped envelope.

Sincerely,

ACK

AFA

APP

Wesley R. Parsons

CAF

CMU WRP/crm

Enclosures

CTR

EAG

LEG

LIN

OPP

RCH

SEL

WAS

OTH

09968 SEP II &
FP80-RECORDS/REPORTING



BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

DOCKET NO. 951232-TI

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 Service)
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 FILE POST-HEARING MEMORANDA

Defendant, Telecommunication Services, Inc. ("TSI"), moves for an enlargement of time on an agreed basis for the parties to file post-hearing memoranda in this case.

- 1. This matter was heard by the Commission on August 19, 1998.
- Under the procedural order, post-hearing memoranda are due on September
 17, 1998.
- TSI's attorney has an evidentiary hearing on class certification representing the Florida Department of Agriculture and Consumer Services on September 14, 1998, before Judge Amy Dean in Dade County Circuit Court Case No. 97-23093 CA 06, and cannot devote sufficient time to framing of his post-hearing memorandum until after the hearing is concluded.
- 4. TSI respectfully requests an enlargement of time of one week, through September 24, 1998, for the parties to file the memoranda.

DOCUMENT NUMBER-DATE

TSI's attorney has consulted with Transcall's attorney, and staff of the
 Commission, who agree to the requested enlargement.

ADORNO & ZEDER, P.A.

Jon W. Zeder

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Attorneys for 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 10 day of September, 1998 to:

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

Beth Keating
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, Florida 32301

Kathy L. Welch, CPA Regulatory Analyst Supervisor Florida Public Service Commission 3625 N.W. 82nd Avenue, Suite 400 Mismi, Florida 33166-7602

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