

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

Complaint of Cbeyond Communications,
LLC against AT&T Communications
of the Southern States, LLC, d/b/a
AT&T and AT&T Florida for failure
to pay intrastate access charges pursuant
to Cbeyond's Price List and interconnection
Agreement and for violation of Section
364.16(3)(a), Florida Statutes.

Docket No. 090142-TP

Filed: April 2, 2009

**JOINT MOTION FOR EXTENSION OF TIME TO RESPOND
TO AMENDED COMPLAINT
AND FOR ANY REQUIRED RESPONSIVE PLEADING**

Cbeyond Communications, LLC (Cbeyond), AT&T Communications of the Southern States, LLC (AT&T Communications) and BellSouth Telecommunications, Inc. d/b/a AT&T Florida d/b/a AT&T Southeast (AT&T Florida) (collectively, AT&T), pursuant to Rule 28-106.204, Florida Administrative Code, file this Joint Motion for Extension of Time to Respond to Amended Complaint and Extension of Time to respond to any required responsive pleading. As grounds therefor, the Parties state:

1. On March 19, 2009, Cbeyond filed a Complaint in this case.
2. The CASR calls for AT&T Florida's response to the Complaint to be filed on April 8, 2009.
3. On April 1, 2009, Cbeyond filed an Amended Complaint in which it added AT&T Communications as a Respondent in this proceeding.
4. AT&T has agreed to accept service of the Amended Complaint via its counsel.

5. Counsel for the Parties have a number of commitments over the next few weeks and request additional time to file their clients' respective pleadings. In addition, counsel for Cbeyond will be out of the country from April 19-April 26.

6. The Parties have conferred and request that the Prehearing Officer require AT&T to respond to the Amended Complaint on May 1st and that Cbeyond's responsive pleading, if any is required, be due May 8th.

WHEREFORE, for the foregoing reasons, Cbeyond and AT&T request that the Prehearing Officer grant this motion and authorize the schedule described herein.

s/ Vicki Gordon Kaufman

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing Joint Motion was served via Electronic Mail and U.S. Mail this 2nd day of April, 2009 to the following:

Charles Murphy
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s/ Vicki Gordon Kaufman
Vicki Gordon Kaufman