



# OFFICE OF THE ATTORNEY GENERAL

DEPARTMENT OF LEGAL AFFAIRS  
THE CAPITOL

TALLAHASSEE, FLORIDA 32399-1050

**ROBERT A. BUTTERWORTH**  
*Attorney General  
State of Florida*

April 22, 1993

Steve Tribble, Director  
Division of Records and Reporting  
Florida Public Service Commission  
101 East Gaines Street  
Tallahassee, Florida 32399-0850

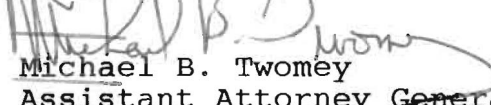
Re: Docket No. 920260-TL

Dear Mr. Tribble:

Enclosed for filing in the above-referenced docket on behalf of the State of Florida are the original and three (3) copies of the Attorney General's Notice of Deposition Duces Tecum and Notice of Deposition.

Please indicate the time and date of receipt on the enclosed duplicate of this letter and return it to our office.

Sincerely,

ACK   
AFA Michael B. Twomey  
APP Assistant Attorney General

CAF MBT:apt

CMU Enclosures

CTR /

EAG

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OTH

*Notice of Deposition*  
DOCUMENT NUMBER-DATE

04454 APR 23 83

FFSC RECORDS/REPORTING

*Duces Tecum*  
DOCUMENT NUMBER-DATE

04453 APR 23 83

**CERTIFICATE OF SERVICE  
DOCKET NO. 920260-TL**

I HEREBY CERTIFY that a copy of the foregoing has been furnished by U.S. Mail or hand-delivery to the following parties on this 22nd day of April, 1993.

Marshall Criser, III  
BellSouth Telecommunications,  
Inc. (Southern Bell Telephone  
& Telegraph Company)  
150 S. Monroe St., Suite 400  
Tallahassee, FL 32301

Harris B. Anthony  
BellSouth Telecommunications,  
Inc. (Southern Bell Telephone  
& Telegraph Company)  
150 W. Flagler St., Suite 1910  
Miami, FL 33130

Robin Norton  
Division of Communications  
Fla. Public Service Commission  
101 East Gaines Street  
Tallahassee, FL 32301

Doug Lackey  
BellSouth Telecommunications,  
Inc. (Southern Bell Telephone  
& Telegraph Company)  
4300 Southern Bell Center  
Atlanta, GA 30375

Charles J. Beck  
Office of the Public Counsel  
812 Claude Pepper Building  
Tallahassee, FL 32399-1400

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P.O. Box 1876  
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Angela Green  
Tracy Hatch  
Jean Wilson  
Division of Legal Services  
Fla. Public Service Commission  
101 East Gaines Street  
Tallahassee, FL 32301

Edward Paschall  
Florida AARP Capital City Task  
Force  
1923 Atapha Nene  
Tallahassee, FL 32301

The American Association of  
Retired Persons  
c/o Bill L. Bryant, Jr.  
Foley & Lardner  
215 S. Monroe St., Suite 450  
P.O. Box 508  
Tallahassee, FL 32302-0508

Richard D. Melson  
Hopping, Boyd, Green & Sams  
23 South Calhoun Street  
P.O. Box 6526  
Tallahassee, FL 32314

Michael J. Henry  
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MCI Center  
Three Ravinia Drive  
Atlanta, GA 30346

Lance C. Norris, President  
Florida Pay Telephone Assn., Inc.  
8130 Baymeadows Circle, West  
Suite 202  
Jacksonville, FL 32256

Joseph A. McGolthlin  
Vicki Gordon Kaufman  
McWhirter, Grandoff & Reeves  
315 S. Calhoun Street, Suite 716  
Tallahassee, FL 32301

Rick Wright  
AFAD  
Fla. Public Service Commission  
101 East Gaines Street  
Tallahassee, FL 32301

Peter M. Dunbar  
Haben, Culpepper, Dunbar  
& French, P.A.  
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Tallahassee, FL 32301

Patrick K. Wiggins  
Wiggins & Villacorta, P.A.  
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Tallahassee, FL 32302

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Peter Q. Nyce, Jr.  
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Office of the Judge Advocate  
General  
Department of the Army  
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Arlington, VA 22203-1837

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Orlando, FL 32854-1038

C. Everett Boyd, Jr.  
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P.O. Drawer 1170  
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Chanthina R. Bryant  
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Atlanta, GA 30339


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Southern States, Inc.  
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Tallahassee, FL 32301

Florida Hotel and Motel Assn.  
c/o Thomas F. Woods  
Gatlin, Woods, Carlson  
& Cowdery  
1709-D Mahan Drive  
Tallahassee, FL 32308

Douglas S. Metcalf  
Communications Consultants, Inc.  
P.O. Box 1148  
Winter Park, FL 32790-1148

Benjamin H. Dickens, Jr.  
Blooston, Mordkofsky, Jackson  
& Dickens  
2120 L Street., N.W.  
Washington, DC 20037

Floyd R. Self  
Messer, Vickers, Caparello,  
Lewis, Goldman & Metz, P.A.  
P.O. Box 1876  
Tallahassee, FL 32302-1876

  
Mike Twomey  
Assistant Attorney General



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Sincerely,

  
Michael B. Twomey  
Assistant Attorney General

MBT:apt

Enclosures

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

Comprehensive Review of the )  
Revenue Requirements and Rate )  
Stabilization Plan of Southern )  
Bell Telephone & Telegraph Company) )

Docket No. 920260-TL

NOTICE OF DEPOSITION DUCES TECUM

TO: Harris R. Anthony, Esquire  
c/o Marshall M. Criser III  
150 South Monroe Street  
Tallahassee, Florida 32301


Pursuant to Florida Rule of Civil Procedure 1.310(b)(6), the Attorney General of the State of Florida, by and through his undersigned counsel, will take the sworn deposition upon oral examination of Southern Bell Telephone & Telegraph Company, for purposes of discovery and such other purposes as are permitted by the Florida Rules of Civil Procedure. The deponent shall bring to the deposition:

The complete personnel file of Southern Bell employee Alma Paruolo; her travel records for the past 12 months; records of all toll calls placed by Alma Paruolo from any Southern Bell office of facility (including by corporate credit card) for the past 12 months; and Alma Paruolo's office calendars for 1992 and 1993.

The deposition will be taken at the following time and place:

Thursday, April 29, 1993 at 9:00 a.m., Office of the Attorney General, 401 Northwest Second Avenue, Suite 921N, Dade County Regional Service Center, Miami, Florida 33128.

Dated this 22nd day of April, 1993.

  
Michael B. Twomey  
Assistant Attorney General  
Office of the Attorney General  
PL 01, The Capitol  
Tallahassee, Florida 32399  
(904) 488-5899

DOCUMENT NUMBER-DATE

04453 APR 23 88

FFSC-RECORDS/REPORTING

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