

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Initiation of show cause	•	}	DOCKET NO. 001109-T1
Proceedings against WebNet		}	Filed Date: September 11, 2001
Communications, Inc. for		}	<u>-</u>
Apparent violation of Rule 25-		}	
4.118, F.A.C., Local, Local		}	,
Toll, and Toll Provider Selection.		}	

Motion for Extension of Time

WebNet Communications, Inc. ("WebNet" or "Company"), through undersigned counsel hereby respectfully requests an Extension of Time within which to file its Rebuttal Testimony and Exhibits in the above-referenced matter and in support thereof states:

- 1. WebNet's Rebuttal Testimony and Exhibits is presently due on September 17, 2001. Attorneys for WebNet have been in good faith and diligent contact with Staff Counsel, Wayne Knight, throughout the past several months in an attempt to schedule a date for the previously granted settlement conference and continue to work with Staff Counsel to reach such resolution. In the meantime, due to circumstances beyon WebNet's and its counsel's control, new undersigned counsel has had to recently take over representation of WebNet in this matter.
- 2. In light of the fact that the parties are engaged in good faith efforts to settle this matter and the recent circumstances, WebNet asks the Commission for an extension of time up to and include **September 19, 2001** within which to file the required Testimony to

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allow undersigned counsel, who has only recently taken over this matter on behalf of the

Company, ample opportunity to prepare the requisite Testimony and Exhibits and represent

WebNet effectively. In the meantime, WebNet will continue its discussions with Staff

Counsel and pursue possibilities for resolution of this matter.

3. WebNet has conferred with Wayne Knight at the Public Service Commission

to obtain consent to this motion. Staff Counsel has indicated that it will not stipulate to the

extension of time.

WHEREFORE, WebNet moves the Commission for an extension of time, up to and

including September 19, 2001 within which to file its Rebuttal Testimony and Exhibits.

Respectfully submitted,

Loubna W. Haddad

Regulatory Counsel

The Helein Law Group, P.C. 8180 Greensboro Drive, Suite 700

McLean, Virginia 22102

(703) 714-1305

CERTIFICATE OF SERVICE

This is to certify that I have on this day served upon those persons listed below a true and correct copy of the foregoing, Request for Extension of Time Within Which to File Rebuttal Testimony and Exhibits for WebNet Communications, Inc., Docket No. 001109-T1 by depositing a copy of same in the Federal Express Delivery Mail in a properly addressed envelope with sufficient postage thereon to insure delivery to:

Wayne D. Knight
Staff Counsel
Florida Public Service Commission
Gerald Gunter Building
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

This 12th day of September, 2001.

The Helein Law Group, P.C.

Loubna W. Haddad, Esq. 8180 Greensboro Drive, Suite 700

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