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ORIGINAL

From: Jennys Castillo [jcastillo@gray-robinson.com]
Sent: Wednesday, November 22, 2006 2:07 PM
To: Filings@psc.state.fl.us
Cc: andrew.shore@bellsouth.com; james.meza@bellsouth.com; kip.edenfield@bellsouth.com; Frank Rullan; Gary Resnick; Dale Buys; Jason Fudge; Patrick Wiggins
Subject: Docket No. 060684 - TP

Attachments: Litestream Holdings\_ LLC's Unopposed Motion for Extension of Time.PDF



Litestream
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Good Afternoon:

On behalf of Litestream Holdings, LLC, attached please find for filing an electronic copy of Litestream Holdings, LLC's Unopposed Motion for Extension of Time.

If you have any questions, please do not hesitate to contact Gary Resnick or Frank Rullan. Their contact information is as follows:

Gary Resnick, Esq.
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Thank you,

Jennys Castillo
Assistant to Gary Resnick and Frank Rullan GrayRobinson, P.A.
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November 22, 2006

**VIA ELECTRONIC MAIL**

Ms. Blanca S. Bayó, Director  
Division of the Commission Clerk and  
Administrative Services  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850

**Re: Litestream Holdings, LLC's Unopposed Motion for Extension of Time  
Docket No. 060684-TP**

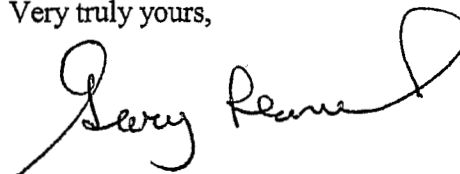
Dear Ms. Bayó:

Enclosed please find Litestream Holdings, LLC's Unopposed Motion for Extension of Time, which we ask that you please file in the captioned docket.

Copies have been served to the parties shown on the Certificate of Service.

If you have any questions, please do not hesitate to contact me.

Very truly yours,



Gary Resnick

GIR:jc  
Enclosure

cc: All Parties of Record  
Litestream Holdings, LLC

DOCUMENT NUMBER-DATE  
10766 NOV 22 06  
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BEFORE THE  
FLORIDA PUBLIC SERVICE COMMISSION

In the Matter of: )  
Complaint and Petition for Declaratory )  
Relief of Litestream Holdings, LLC )  
Against BellSouth Telecommunications, Inc.)

Docket No. 060684-TP

Filed: November 22, 2006

LITESTREAM HOLDINGS, LLC'S  
UNOPPOSED MOTION FOR EXTENSION OF TIME

Litestream Holdings, LLC ("Litestream") files this Unopposed Motion for Extension of Time and prays and states as follows:

1. On October 17, 2006, Litestream filed a Complaint and Petition for Declaratory Relief ("Complaint") against BellSouth Telecommunications, Inc.
2. On October 27, 2006, filed an Unopposed Motion for Extension of Time to respond to the Complaint ("Motion").
3. On November 7, 2006, this Honorable Commission granted the Motion.
4. On November 17, 2006, BellSouth filed its Response to Litestream's Complaint ("Response"). The Response, however, included a request to dismiss the Complaint ("Request to Dismiss"). Assuming BellSouth's Request to Dismiss constitutes a motion to dismiss, pursuant to Rule 28-106.204, Florida Administrative Code, Litestream has seven (7) days to file a response in opposition.
5. Counsel for Litestream has a number of upcoming scheduling conflicts and therefore needs additional time to prepare a response to BellSouth's Request to Dismiss.

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6. Litestream seeks through December 8, 2006 to file a response in opposition to the request to Dismiss.

7. Counsel has contacted counsel for BellSouth and informs the Commission that BellSouth has no objection to the requested extension.


8. No party would be negatively impacted by the Commission granting Litestream's requested extension. Furthermore, there is currently no schedule in place to be impacted.

**WHEREFORE**, Litestream respectfully requests an extension of time through and including December 8, 2006, in which to file a response in opposition to BellSouth's Request to Dismiss.

Respectfully submitted this 22nd day of November 2006.

By:

s/

  
Gary Resnick  
(Florida Bar No. 54119)  
Frank A. Rullan  
(Florida Bar No. 150592)  
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Attorneys for Litestream Holdings, LLC

**CERTIFICATE OF SERVICE**  
**Docket No. 060684-TP**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via Electronic Mail and First Class U.S. Mail this 22<sup>nd</sup> of November, 2006, to the following:

Patrick Wiggins, Supervising Attorney  
Dale Buys  
Jason Fudge  
Florida Public Service Commission  
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s/  
Frank A. Rullan

