

Eric Fryson

From: Greg <greg@bartonsmithpl.com>
Sent: Monday, April 08, 2013 4:49 PM
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Subject: RE: DOCKET NUMBER 120054-EM - Unopposed Motion for Extension of Time
Attachments: Motion for Extension of Time v2.pdf

Good Afternoon,

The person filing this document is:

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DOCKET NUMBER: 120054-EM

This Motion for Extension of Time to File a Response to Monroe County's Motion to Strike is being filed on behalf of Robert Reynolds and Julianne Reynolds.

Total number of pages (including attached documents): 3

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BEFORE THE STATE OF FLORIDA PUBLIC SERVICE COMMISSION

ROBERT D. REYNOLDS and JULIANNE C.
REYNOLDS

Complainants,

v.

UTILITY BOARD OF THE CITY OF KEY
WEST, FLORIDA d.b.a KEYS ENERGY
SERVICES, et al.

Docket Number: 120054-EM

Filed: April 8, 2013

Respondents.

and

MONROE COUNTY, a political subdivision
of the State of Florida, NO NAME KEY
PROPERTY OWNERS ASSOCIATION, INC.

Interveners.

**UNOPPOSED MOTION FOR EXTENSION OF TIME TO RESPOND TO MONROE
COUNTY'S MOTION TO STRIKE**

Complainants, ROBERT D. REYNOLDS and JULIANNE C. REYNOLDS (collectively, "Reynolds"), by and through undersigned counsel and pursuant to the Florida Rules of Administrative Code, file this Unopposed Motion for Extension of Time to Respond to Monroe County's Motion to Strike, and in support states as follows:

1. On March 20, 2013 the Reynolds filed their Second Amended Complaint, which in part requested the Public Service Commission (c) Issue an Order finding that Monroe County cannot unreasonably withhold building permits from KES' customers based solely on their property location being on the island of No Name Key and mandate that Monroe County may not prevent the connection of a homeowner on No Name Key to the coordinated power grid; and (e) Award reasonable attorney's fees and costs for the prosecution of this action;

2. On April 1, 2013, Monroe County filed its Motion to Strike seeking to strike paragraphs (c) and (e), restated above, of the Reynolds Second Amended Complaint.

3. The undersigned counsel seeks to amend the Second Amended Complaint to revise language in the prayer for relief which may render the need to respond the Motion to Strike, moot.

4. Counsel for the Reynolds has conferred with counsel for Monroe County and counsel for Monroe County has represented they have no objection to the granting of this Motion.

WHEREFORE, the Complainants, ROBERT D. REYNOLDS and JULIANNE C. REYNOLDS, respectfully request that this Commission enter an order granting an additional ten (10) days to respond to Monroe County's Motion to Strike, through and including April 18, 2013 and for such other relief this Commission may deem appropriate.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was served by Electronic Mail to the attached Service List this 8th day of April, 2013.

Respectfully submitted,

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