

18

LAW OFFICES
ROSE, SUNDBSTROM & BENTLEY
 A PARTNERSHIP INCLUDING PROFESSIONAL ASSOCIATIONS
 2548 BLAIRSTONE PINES DRIVE
 TALLAHASSEE, FLORIDA 32301
 (904) 877-6555

**ORIGINAL
FILE COPY**

ROBERT A. ANTISTA
 CHRIS H. BENTLEY, P.A.
 F. MARSHALL DETERDING
 MARTIN S. FRIEDMAN, P.A.
 JOHN R. JENKINS
 ROBERT M. C. ROSE, P.A.
 WILLIAM E. SUNDBSTROM, P.A.
 DIANE D. TREMOR
 JOHN L. WHARTON

MAILING ADDRESS
 POST OFFICE BOX 1567
 TALLAHASSEE, FLORIDA 32302-1567

TELECOPIER (904) 656-4029

April 19, 1991

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

Re: Docket No. 910111-WS; Complaint and Petition of
 Sandy Creek Airpark, Inc. against Sandy Creek
 Utilities, Inc. regarding provision of water
 and sewer service in Bay County
Our File No. 28031.01

Dear Mr. Tribble:

Attached please find the original and fifteen (15) copies of
 the Motion for Extension of Time to File Direct Testimony, filed by
 Sandy Creek Airpark, Inc., in the above-referenced docket.

Should you have any questions or comments regarding this
 matter, please do not hesitate to contact me.

Sincerely,



F. Marshall Deterding
 For the Firm

- ACK
- AFA _____
- APP _____
- CAF _____
- CMU _____
- CTR _____
- CTR ~~FMD:lcb~~
- EAG _____
- LEG 1/6/91 Enclosure
- LIN 6 cc: Matthew Feil, Esquire
- OPC _____
- RCH _____
- SEC 1
- WAS 1
- OTM _____

DOCUMENT NUMBER DATE

03809 APR 19 1991

RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

ORIGINAL
FILE COPY

In re: Complaint and Petition of Sandy)
Creek Airpark, Inc. against Sandy Creek)
Utilities, Inc. regarding provision of) Docket No. 910111-WS
water and sewer service in Bay County.)
_____)

MOTION FOR EXTENSION OF TIME TO FILE DIRECT TESTIMONY

SANDY CREEK AIRPARK, INC. (hereinafter "Sandy Creek" or "Petitioner") by and through its undersigned counsel hereby files this Motion for Extension of Time to file its direct testimony, and in support thereof states:

1. Late on Wednesday, April 17, 1991, undersigned counsel for Petitioner received the Commission's Case Assignment and Scheduling Record ("CASR"), which is dated April 12, 1991. Petitioner's counsel first had an opportunity to review these documents on April 18, 1991.

2. This scheduling document indicates that the Petitioner's direct testimony in support of its Complaint is due to be filed with the Florida Public Service Commission on April 30, 1991. This provides the Petitioner eleven (11) days from the date Petitioner's counsel was able to inform his client and that client's consultants of the need for testimony in order to complete that testimony in support of its Application. The Respondent in this case is allowed under the terms of the Order establishing procedure and the CASR, thirty (30) days in which to prepare its testimony after Petitioner's testimony is filed.

DOCUMENT NUMBER-DATE

03809 APR 19 1991

FSC-RECORDS/REPORTING

3. This case presents numerous complicated issues, and several issues of first impression for the Commission.

4. Petitioner does not believe that eleven (11) days from notification to the date that its direct testimony is due provides sufficient time under these circumstances.

WHEREFORE, for all the above stated reasons, Petitioner requests that this Commission provide the Petitioner up to and through May 24, 1991 in which to file its direct testimony. Petitioner believes that the Commission can reschedule other events which will still provide three (3) weeks or more to Respondent to prepare its testimony after Petitioner's direct testimony has been submitted, without any change in the proposed hearing dates.

Respectfully submitted this 19th
day of April, 1991, by:

ROSE, SUNDSTROM & BENTLEY
2548 Blairstone Pines Drive
Tallahassee, Florida 32301
(904) 877-6555

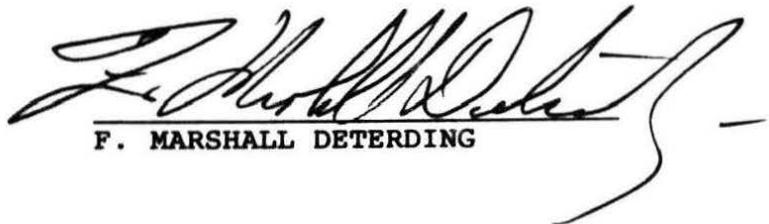

F. MARSHALL DETERDING

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing Motion For Extension of Time to File Direct Testimony has been furnished by U.S. Mail or Hand Delivery to the following this 19th day of April, 1991.

**Matthew Feil, Esquire
Division of Legal Services
Florida Public Service Commission
101 East Gaines Street
Tallahassee, Florida 32399-0850**

**Kenneth Gatlin, Esquire
Gatlin Woods Carlson & Cowdery
1709 Mahan Drive
Tallahassee, Florida 32308**


F. MARSHALL DETERDING