

**Bacon, Bacon, Harrington,
Johnson & Goddard, P.A.**

ATTORNEYS AT LAW
POST OFFICE BOX 13576
2959 FIRST AVENUE NORTH
ST. PETERSBURG, FLORIDA 33733-3576

*add
ATTY*
ORIGINAL
FILE COPY

ADRIAN S. BACON, of counsel

DAVID A. BACON
BRIAN C. HARRINGTON
DALE A. JOHNSON
FRANK W. GODDARD
DAVID A. LAMONT

May 21, 1991

TELEPHONE
(813) 327-3935
FAX
(813) 323-4936

Public Service Commission
Director of Records and Reporting
101 East Gaines Street
Tallahassee, Florida 32399-0870

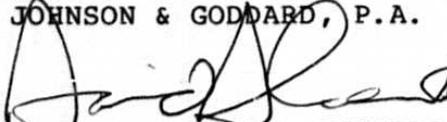
RE: ~~Docket Number 910056-PU~~
Complaint of Consumer John Falk regarding resale
of electricity and gas by the H. Geller
Management Company

Dear Sir or Madam:

Enclosed herewith you will please find, for filing in the
above-referenced matter, the original of Consumer John Falk's
Motion for Extension of Time to File Brief. Your cooperation in
this regard is greatly appreciated.

Sincerely,

BACON, BACON, HARRINGTON,
JOHNSON & GODDARD, P.A.


DAVID A. LAMONT, ESQUIRE

DOCUMENT NUMBER-DATE

05206 MAY 22 1991

PSC-RECORDS/REPORTING

BEFORE THE PUBLIC SERVICE COMMISSION

IN RE: Complaint of Consumer John
Falk regarding resale of electricity
and gas by the H. Geller Management
Company.

DOCKET NO. 910056-PU

CONSUMER JOHN FALK'S
MOTION FOR EXTENSION OF TIME TO FILE BRIEF

COMES NOW the Consumer John Falk, by and through his undersigned legal counsel, and hereby respectfully moves this Honorable Commission for an extension of time in which to file his brief as to the issues identified in the above-captioned cause, and in support hereof states the following:

1. Counsel for John Falk did not receive the record of the formal hearing until Monday, May 20, 1991.
2. Because of the untimely receipt of the record of the formal hearing, counsel for Consumer John Falk has not had and will not have ample time to adequately review the record of the formal hearing, nor the late-filed exhibits filed in the above-captioned cause, in order to properly prepare the brief on behalf of Consumer John Falk as to the issues identified in the above-captioned cause.
3. Counsel for Consumer John Falk needs only one week in which to complete preparation of Consumer John Falk's brief, and will file the same with this Honorable Commission not later than the close of business, Thursday, May 30, 1991.

DOCUMENT NUMBER-DATE
05206 MAY 22 1991
PSC-RECORDS/REPORTING

WHEREFORE, Consumer John Falk respectfully requests this Honorable Commission to grant him an extension of one week in which to file his brief of the issues raised in the above-captioned cause.

Bacon, Bacon, Harrington, Johnson
& Goddard, P.A.

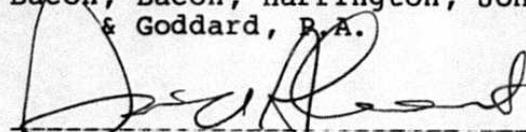


BY: DAVID A. LAMONT, ESQUIRE
Post Office Box 13576
St. Petersburg, Florida 33733-3576
(813) 327-3935
Attorneys for Consumer John Falk

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was furnished by Federal Express to C. Everett Boyd, Esquire, Post Office Drawer 1170, Tallahassee, Florida 32302; Michael A. Palecki, Esquire, 101 East Gaines Street, Tallahassee, Florida 32399-0863; and Prentice Pruitt, Esquire, 101 East Gaines Street, Tallahassee, Florida 32399-0861 this 21st day of May, 1991.

Bacon, Bacon, Harrington, Johnson
& Goddard, P.A.



BY: DAVID A. LAMONT, ESQUIRE
P.O. Box 13576
St. Petersburg, Florida 33733-3576
(813) 327-3935
Attorneys for Consumer John Falk