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**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In RE: Docket No. 920260-TL-  
Comprehensive review of the )  
revenue requirements and rate )  
stabilization plan of SOUTHERN )  
BELL TELEPHONE AND TELEGRAPH )  
COMPANY. (Dockets 900960, )  
910163, 910727, 911034 are )  
also included in this proceeding.

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**MOTION TO QUASH SUBPOENA**

COMES NOW, BETTY MOORE, HELEN C. VOUGHT, LINDA HUNT, PETER MURRAY, MARY DUNN, DONNA JOHNSON, and MARTHA STEWART, by and through their undersigned attorneys, and moves this Honorable Florida Public Service Commission for an order quashing the subpoenas received by Betty Moore, Helen C. Vought, Linda Hunt, Peter Murray, Mary Dunn, Donna Johnson and Martha Stewart, a copy of which are <sup>\*</sup>attached hereto, and as grounds therefore would state:

1. That the Public Counsel has previously taken the deposition of the witnesses involved.
2. As to all material relevant facts the witnesses evoked the Fifth Amendment to the Constitution of the United States preventing them from testifying about any acts which would tend to incriminate them in any criminal proceeding.
3. The persons involved are crafts people who were following directions from Southern Bell and management.

\* No ATTACHMENT

DOCUMENT NUMBER-DATE  
**13629 DEC 22 82**  
FPSC-RECORDS/REPORTING

4. Compelling these witnesses to appear in Tallahassee would be a complete waste of time in that these witnesses intend to take the Fifth Amendment.

5. No immunity has been offered although the Public Counsel has asked the Public Service Commission to grant immunity to these witnesses and no immunity has been granted.

6. These proceedings are calculated to embarrass and/or harass the witnesses and there is no purpose served in connection therewith.

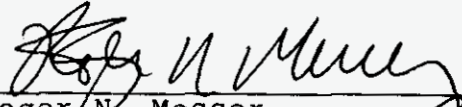
7. The witnesses do not reside or transact business in Tallahassee, Florida, and such a hearing would be a burden on themselves and their families.

WHEREFORE, your movants respectfully request this Honorable Agency quash the subpoenas issued against them to appear before a hearing in Tallahassee, on February 7, 1994.

I HEREBY CERTIFY that a true and correct copy of the foregoing was furnished by mail this 18<sup>th</sup> day of December, 1993, to Steve Tribble, Director Records and Reporting, Florida Public Service Commission, By Kay Flynn, Chief Bureau of Records, and Charles J. Beck, Attorney for Citizens of Florida Office of Public Counsel, 111 W. Madison Street, Room 812, Tallahassee, FL 32399-

1400.

MESSER AND RAY



Roger N. Messer



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Attorneys for Movants

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WHEREFORE, your movants respectfully request this Honorable Agency quash the subpoenas issued against them to appear before a hearing in Tallahassee, on February 7, 1994.

I HEREBY CERTIFY that a true and correct copy of the foregoing was furnished by mail this 15<sup>th</sup> day of December, 1993, to Steve Tribble, Director Records and Reporting, Florida Public Service Commission, By Kay Flynn, Chief Bureau of Records, and Charles J. Beck, Attorney for Citizens of Florida Office of Public Counsel, 111 W. Madison Street, Room 812, Tallahassee, FL 32399-

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