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CALVIN "BILL" WOOD
Petitioner

v

DOAH Case No. 99-3595
99083595-TL

GTE FLORIDA, INC.
Respondent.

990861-TL

**PETITIONERS MOTION TO COMPEL
EXPEDITED DISCOVERY FROM GTE**

This 19th day of November, 1999, comes the Petitioner, Calvin "Bill" Wood, pro se, and
Represents to the Court as follows:

1. That on November 7, 1999, Petitioner lost his mother to cancer and she was buried on
November 10, and Petitioner returned home on November 12;

2. Petitioner's sister called on November 2, stating that petitioner's mother had requested
his presence and as head of his clan, Petitioner was required to go be with her, which he did as
soon as possible after the request;

3. That activities involving Petitioner's mother took up considerable time before he went
to be with her, and as clan chief, plaintiff was required to address and perform the same;

4. The duties of plaintiff are both cultural and religious in nature, and are customary in his
family and his people;

5. Petitioner was forced to miss a stipulation teleconference on November 9, 1999 set up
by the PSC but notified PSC of the situation with his mother;

6. On Thursday, November 18, 1999, in a stipulation teleconference, in which Plaintiff
provided PSC and GTE with facts he could stipulate, and gave both his witnesses and exhibits
(AND RECEIVED NOTHING IN RETURN FROM EITHER PSC OR GTE), GTE refused to

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APP _____
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OTH _____

1 participate in giving Petitioner ANY discovery;

2 7. Plaintiff knows most of the matter by this time but still needs information only GTE
3 has, and which has been asked for at a prior time;

4 WHEREFORE, Petitioner respectfully moves the court to compel GTE to provide him
5 with the names, address, telephone numbers of the GTE employees/agents who worked on the
6 lines which led from the SR 60 switch house to Petitioner's home off Schaefer Lane, and any
7 reports which they generated concerning any lines in Petitioner's cable, and to deliver these
8 reports to petitioner's office at 10577 Schaefer Lane, Lake Wales, FL, for copying, on a date and
9 time to be determined by the court. Petitioner further Moves the court for any and all other relief
10 to which it may be entitled.

11 Plaintiff, Pro Se

12
13 *Calvin W. Wood*
14

15
16 Calvin "Bill" Wood, J.D.
17 10577 Schaefer Lane
18 Lake Wales, FL 33856
19 Phone: (941)696-9542
20 Fax: (941)696-8914
21 Email: chiefbillwood@ithink.net

CERTIFICATE OF SERVICE

I, Calvin Willie Wood, do hereby certify that I have serve true copies of Petitioner's

1. Motion To Compel Expedited Discovery From GTE
2. Motion To Use Telephone/Speaker Phone for Out of Town Witnesses, and
3. Renewed Motion to Disqualify PSC Attorneys From Instant Case

by US Mail, postage prepaid on October 19, 1999, upon attorneys for the Defendants addressed as follows:

GTE Florida Inc - Kimberly Caswell, Esq.
PO Box 110
Tampa, , FL 33601

Public Service Comm - Donna M. Clemons, Esq.
Gerald L. Gunter Building
2540 Shumard Oak Boulevard
Tallahassee, FL 32339

Florida Public Service Commission-
Bureau of Records and Reporting
Ms. Kay Flynn, Chief
2540 Shumard Oak Boulevard
Tallahassee, FL 32399

Calvin W. Wood

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