

An extension will allow the undersigned and Ms. Caswell, counsel most familiar with the issues on appeal, adequate time to prepare a cogent, concise reply.

3. The slight delay occasioned by this extension will not cause prejudice to any party. Indeed, the undersigned counsel certifies that counsel for Appellees and counsel for amicus curiae both have stated that they have no objection to this requested extension. The undersigned further certifies that this motion is brought in good faith and not for any improper purpose.

Wherefore, Appellant respectfully requests this Court grant Appellant an additional 20 days in which to serve the Reply Brief.

Respectfully submitted,



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CERTIFICATE OF SERVICE


I HEREBY CERTIFY that a true and correct copy of the foregoing
**Appellant's Unopposed Motion for Extension of Time for the Service of
Appellant's Reply Brief** has been furnished, by U.S. Mail, to

Christiana T. Moore, on behalf of the Commission Staff
Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Blanca S. Bayo`, Director
Division of Records and Reporting
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on May 29, 2001.



Attorney