

ORIGINAL

MEMORANDUM

February 1, 2002

TO: DIVISION OF THE COMMISSION CLERK AND ADMINISTRATIVE SERVICES

FROM: OFFICE OF THE GENERAL COUNSEL (CHRISTENSEN) *Pae*

RE: DOCKET NO. 000028-TL - PETITION BY BELLSOUTH TELECOMMUNICATIONS, INC. FOR WAIVER OF RULES 25-4.107, 25-4.108, AND 25-4.113, F.A.C., WHICH REQUIRE PROVISION OF BASIC TELECOMMUNICATIONS SERVICE TO CERTAIN LOCATIONS AND PERSONS.

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Please place the attached Renewed Motion to Continue, from Anthony Parks, in the above-referenced docket file.

PAC/lw  
Attachment

AUS \_\_\_\_\_  
CAF \_\_\_\_\_  
CMP \_\_\_\_\_  
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ECR \_\_\_\_\_  
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OPC \_\_\_\_\_  
MMS \_\_\_\_\_  
SEC   ✓    
OTH \_\_\_\_\_

DOCUMENT NUMBER DATE  
01315 FEB-4 8  
FPSC-COMMISSION CLERK  
*me*

STATE OF FLORIDA  
PUBLIC SERVICE COMMISSION

Docket No. 000028-TL

BELL SOUTH

VS.

ANTHONY PARKS

RENEWED MOTION TO CONTINUE

I am renewing my original motion to continue this matter, however I am adding something further. On December 14, 2001 I filed a Chapter 13 petition in U.S. Bankruptcy Court in Miami, Florida under Case No. 01-43145.

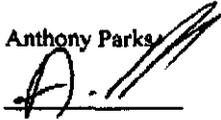
While my issues are resolved and I have requested that my attorneys dismiss the petition, it is still a standing matter as of now, and that an automatic stay is in effect and proceeding with these proceedings is going against the automatic stay.

Bell South's position is that I owe back money and as a result they do not want to give me service anymore. The Bankruptcy Courts authority is to discharge debt, if that was done, Bell South's petition would not be valid. After my conversation with the U.S. Trustees Office, they feel that this is a direct violation of the Automatic Stay and that if these proceedings were to go forward knowing that, that the penalties against all parties could be severe and would be addressed in Federal Court.

Be that as it may I am putting you on formal notice. I have also attached a copy of the petition, and a copy of a response from the Honorable Robert Marks concerning someone else who went against me, who felt that they were exempt, of which Judge Mark has since taken action since that time.

It would be to everyone's best interest to continue this matter.

Anthony Parks



P.O. Box 812283  
Boca Raton, FL 33481  
561-338-5937

February 1, 2002, 2:20 PM

See attachments

CC: James Mezza Of Bell South  
Patty Christensen, Legal Counsel  
Public Service Commission

000201

B

(Official Form 1) (9/97)

<b>FORM B1</b> <b>United States Bankruptcy Court</b> District of _____		<b>Voluntary Petition</b>
Name of Debtor (if individual, enter Last, First, Middle): <b>Anthony Parks</b>		Name of Joint Debtor (Spouse) (Last, First, Middle):
All Other Names used by the Debtor in the last 6 years (include married, maiden, and trade names):		All Other Names used by the Joint Debtor in the last 6 years (include married, maiden, and trade names): <b>AT - 10745</b>
Soc. Sec./Tax I.D. No. (if more than one, state all): <b>127-46-3594</b>		Soc. Sec./Tax I.D. No. (if more than one, state all):
Street Address of Debtor (No. & Street, City, State & Zip Code): <b>1320 S. Dixie Highway                  #1275                  Coral Gables, FL 33146</b>		Street Address of Joint Debtor (No. & Street, City, State & Zip Code): <b>01-43145</b>
County of Residence or of the Principal Place of Business: <b>Dade</b>		County of Residence or of the Principal Place of Business: <b>BK-C-RAM</b>
Mailing Address of Debtor (if different from street address): <b>same as above</b>		Mailing Address of Joint Debtor (if different from street address):
Location of Principal Assets of Business Debtor (if different from street address above):		

**Information Regarding the Debtor (Check the Applicable Boxes)**

**Venue (Check any applicable box)**

- Debtor has been domiciled or has had a residence, principal place of business, or principal assets in this District for 180 days immediately preceding the date of this petition or for a longer part of such 180 days than in any other District.
- There is a bankruptcy case concerning debtor's affiliate, general partner, or partnership pending in this District.

**Type of Debtor (Check all boxes that apply)**

<input type="checkbox"/> Individual(s)	<input type="checkbox"/> Railroad
<input type="checkbox"/> Corporation	<input type="checkbox"/> Stockbroker
<input type="checkbox"/> Partnership	<input type="checkbox"/> Commodity Broker
<input type="checkbox"/> Other _____	

**Chapter or Section of Bankruptcy Code Under Which the Petition is Filed (Check one box)**

<input type="checkbox"/> Chapter 7	<input type="checkbox"/> Chapter 11	<input checked="" type="checkbox"/> Chapter 13
<input type="checkbox"/> Chapter 9	<input type="checkbox"/> Chapter 12	
<input type="checkbox"/> Sec. 304 - Case ancillary to foreign proceeding		

**Nature of Debts (Check one box)**

<input type="checkbox"/> Consumer/Non-Business	<input type="checkbox"/> Business
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**Filing Fee (Check one box)**

<input type="checkbox"/> Full Filing Fee attached
<input checked="" type="checkbox"/> Filing Fee to be paid in installments (Applicable to individuals only) Must attach signed application for the court's consideration certifying that the debtor is unable to pay fee except in installments. Rule 1006(b). See Official Form No. 3.

**Chapter 11 Small Business (Check all boxes that apply)**

- Debtor is a small business as defined in 11 U.S.C. § 101
- Debtor is and elects to be considered a small business under 11 U.S.C. § 1121(e) (Optional)

**Statistical/Administrative Information (Estimates only)**

- Debtor estimates that funds will be available for distribution to unsecured creditors.
- Debtor estimates that, after any exempt property is excluded and administrative expenses paid, there will be no funds available for distribution to unsecured creditors.

Estimated Number of Creditors	1-15	16-49	50-99	100-199	200-999	1000-over		
	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
Estimated Assets	\$0 to \$50,000	\$50,001 to \$100,000	\$100,001 to \$500,000	\$500,001 to \$1 million	\$1,000,001 to \$10 million	\$10,000,001 to \$50 million	\$50,000,001 to \$100 million	More than \$100 million
	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Estimated Debts	\$0 to \$50,000	\$50,001 to \$100,000	\$100,001 to \$500,000	\$500,001 to \$1 million	\$1,000,001 to \$10 million	\$10,000,001 to \$50 million	\$50,000,001 to \$100 million	More than \$100 million
	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

THIS SPACE IS FOR COURT USE ONLY  
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 CLERK  
 U.S. BANKRUPTCY COURT  
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 DEC 14 AM 10:11  
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*Mak*

*Anthony Parks*

P.O. Box 331716  
Miami, Florida 33233  
561-338-5937  
aston28p@aol.com

FILED BY \_\_\_\_\_  
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01 DEC 26 PM 4:26  
CLERK  
U.S. BANKRUPTCY CT.  
S.D. OF FLA.

U.S. District Court  
Southern District Of Florida  
Honorable Judge Marks  
Miami, Florida

Dear Judge Marks

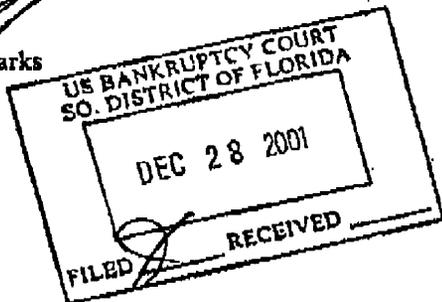
Re: 01-43145

By now you may of received my motion for an emergency motion in reference to A recent violation of the automatic stay. I requested that the state court vacate the Order and it was denied. However today I received an order in the mail today that Stated that it was without prejudice.

I feel it would be only fair to give the state court an opportunity to correct the Situation on their own, therefore I am asking if you could put my motion on Hold until the next few days when I petition the state court again to vacate The order.

Sincerely,  
*[Signature]*  
Anthony Parks

12/26/01



**ORDER**

This motion or application is granted in part.

12/28/01  
Date

*[Signature]*  
ROBERT A. MARK  
U.S. Bankruptcy Judge

The court will defer consideration of the debtor's Emergency Motion to void Foreclosure Judgment. However, the debtor still must appear in Court on January 10, 2002 at 11:00 a.m. in response to this Court's Order to Show Cause.

*10-28-01 Mak*

COPIES TO:  
Anthony Parks  
Codill's & Stawiariski  
Nancy Herkert, Trustee

*RM*