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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Interconnection Agreement between )  
Saturn Telecommunication Services, Inc. )  
d/b/a STS Telecom and BellSouth )  
Telecommunications, Inc. )

040533-TP  
Filed: December 30, 2004

**PETITIONER'S MOTION FOR LEAVE TO FILE LATE REPLY TO  
BELLSOUTH TELECOMMUNICATIONS, INC.'S RESPONSE IN OPPOSITION  
AND MOTION TO DISMISS AMENDED PETITION FOR MEDIATION  
AND/OR ARBITRATION**

COMES NOW the Petitioner, Saturn Telecommunication Services, Inc. ("STS"),  
by and through the undersigned Counsel and requests that this Honorable Court grant  
leave to file a late reply to "Bellsouth Telecommunications, Inc.'s Response In  
Opposition And Motion To Dismiss Amended Petition For Mediation And/Or  
Arbitration" and states as follows:

1. On December 20, 2004, BellSouth filed its Response and Motion.
2. Due to the holidays and our office's vacation schedule, we have been unable to  
file a response to Defendants' Response and Motion.
3. Furthermore, Petitioner's Counsel has attempted to contact Respondent's  
Counsel, but received a voice message stating that Counsel was on vacation.
4. Petitioner's Counsel hereby requests an extension until January 20, 2005 to file a  
Reply.
5. A twenty-day delay to file the Response will not prejudice the BellSouth.
6. This Motion is in furtherance of principals of justice.

**WHEREFORE**, Petitioner, STS, respectfully requests the Commission grant its  
Motion for leave to file late reply to "Bellsouth Telecommunications, Inc.'s Response In  
Opposition And Motion To Dismiss Amended Petition For Mediation And/Or

P \_\_\_\_\_  
M \_\_\_\_\_  
R \_\_\_\_\_  
LR \_\_\_\_\_  
SCL \_\_\_\_\_  
JPC \_\_\_\_\_  
MMS \_\_\_\_\_  
RCA \_\_\_\_\_  
SCR \_\_\_\_\_  
SEC 1

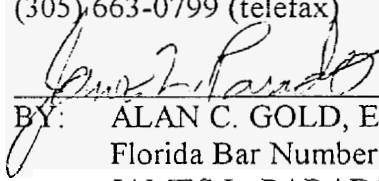
OTH Kim P *Done all the  
address okay -  
1/13/05*

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Arbitration”, extending the deadline to January 20, 2005, and for all other relief the Commission deems just and proper

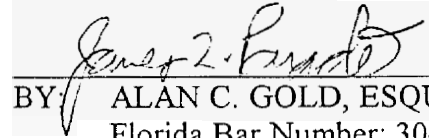
Respectfully submitted,

ALAN C. GOLD, P.A.  
Gables One Tower  
1320 South Dixie Highway  
Suite 870  
Coral Gables, FL 33146  
(305) 667-0475 (office)  
(305) 663-0799 (telefax)

  
BY: ALAN C. GOLD, ESQUIRE  
Florida Bar Number: 304875  
JAMES L. PARADO, ESQUIRE  
Florida Bar Number: 0580910

**CERTIFICATE OF GOOD FAITH**

I **HEREBY** certify that I have attempted to confer with Counsel for Respondent prior to the filing of this Motion, however, have been unable to resolve these issues.

  
BY: ALAN C. GOLD, ESQUIRE  
Florida Bar Number: 304875  
JAMES L. PARADO, ESQUIRE  
Florida Bar Number: 0580910

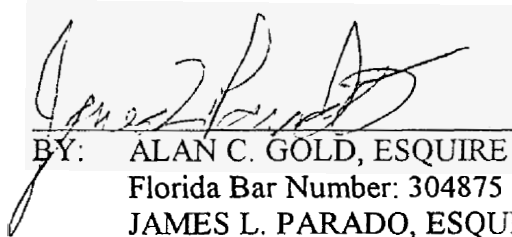
**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing was mailed this 30<sup>th</sup> day of December 2004, to:

NANCY B. WHITE  
C/O Nancy H. Sims  
150 South Monroe Street  
Suite 400  
Tallahassee, FL 32301

R. DOUGLAS LACKEY  
MERIDITH E. MAYS  
Suite 4300, BellSouth Center  
675 West Peachtree Street, N.E.  
Atlanta, GA 30375  
[Lynn.Barclay@bellsouth.com](mailto:Lynn.Barclay@bellsouth.com)

Jason Rojas  
Staff Counsel  
Florida Public Service Commission  
Division of Legal Services  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850  
Tel. No. (850) 413-6179  
[jrojas@psc.state.fl.us](mailto:jrojas@psc.state.fl.us)



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Florida Bar Number: 304875  
JAMES L. PARADO, ESQUIRE  
Florida Bar Number: 0580910