# Messer, Caparello & Self

A Professional Association

Post Office Box 1876 Tallahassee, Florida 32302-1876 Internet: www.lawfla.com

July 22, 2005

### BY HAND DELIVERY

Ms. Blanca Bayó, Director Commission Clerk and Administrative Services Room 110, Easley Building Florida Public Service Commission 2540 Shumard Oak Blvd. Tallahassee, Florida 32399-0850

Re: Docket No. 000475-TP

Dear Ms. Bayó:

Enclosed for filing in the above referenced docket is an original and fifteen copies of a Motion for Leave to Withdraw as Counsel.

Please acknowledge receipt of these documents by stamping the extra copy of this letter "filed" and returning the same to me.

Thank you for your assistance with this filing.

Flord R Self

Sincerely yours

FRS/amb Enclosures

cc: Parties of Record

DOCUMENT NUMBER - DAT

#### BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Complaint by BellSouth Telecommunications, Inc.	)	
against Thrifty Call, Inc. regarding practices in the	)	Docket No. 000475-TP
reporting of percent interstate usage for compensation	)	Filed: July 22, 2005
for jurisdictional access services.	)	
	)	

## MOTION FOR LEAVE TO WITHDRAW AS COUNSEL

Pursuant to Rule 28-106.105(3), F.A.C., Floyd R. Self and the law firm of Messer, Caparello & Self, P.A., as counsel of record for Thrifty Call, Inc., move the Florida Public Service Commission for leave to withdraw as counsel for Respondent in the above-styled proceeding, and as grounds therefore state:

- 1. Undersigned counsel was retained as counsel for Thrifty Call by Thrifty Call's Washington counsel, the Kelley Drye Warren, LLP law firm. The Kelley Drye firm has advised us that they have withdrawn as counsel for Thirfty Call.
- 2. Undersigned counsel has had no communications with Thrifty Call in over one year, and the telephone number for Thrifty call has been disconnected.
- 3. Pursuant to Rule 4-1.16(b) of the Florida Bar Rules of Professional Conduct, withdrawal from representation is allowed for good cause, provided the withdrawal will not have a material adverse effect on the interests of the client. A hearing is not scheduled in this docket, so there is adequate time to prepare for a hearing or any other subsequent proceedings without a material adverse effect to Thrifty Call.
  - 4. The last address we have for Thrifty Call is as follows:

Thrifty Call, Inc. 400 W. Hopkins, Suite 103 San Marcos, TX 78666

WHEREFORE, Floyd R. Self and the law firm of Messer, Caparello & Self, P.A. respectfully request that the Commission enter an order allowing their withdrawal as counsel to Thrifty Call, Inc. in this proceeding.

Respectfully submitted,

FLOYD R SELF, ESQ.

MESSER, CAPARELLO & SELF, P.A.

215 S. Monroe Street, Suite 701

Post Office Box 1876

Tallahassee, FL 32302-1876

(850) 222-0720

## CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been served upon the following parties by Hand Delivery (\*) and/or U.S. Mail this 22<sup>nd</sup> day of July, 2005.

Felicia Banks, Esq.\*
Division of Legal Services
Room 370, Gunter Building
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850
fbanks@psc.state.fl.us

Nancy White, Esq.
James Meza, Esq.
Lisa S. Foshee, Esq.
c/o Nancy H. Sims
BellSouth Telecommunications, Inc.
150 South Monroe Street, Suite 400
Tallahassee, FL 32301
nancy.white@bellsouth.com

Thrifty Call, Inc. 400 W. Hopkins, Suite 103 San Marcos, TX 78666

Floyd R. Self