

Timolyn Henry

From: Slaughter, Brenda [Brenda.Slaughter@BellSouth.COM]
Sent: Friday, October 27, 2006 1:54 PM
To: Filings@psc.state.fl.us
Cc: Edenfield, Kip; Meza, James; Holland, Robyn P; Fatool, Vicki; Patrick Wiggins; Jason fudge; Gary Resnick; Litestream Holdings
Subject: Docket 060684-TP
Importance: High
Attachments: 060684-TP Unopposed Motion Ext of Time.pdf

- A. Brenda Slaughter
 Legal Secretary to E. Earl Edenfield, Jr.
 BellSouth Telecommunications, Inc.
 150 South Monroe Street
 Suite 400
 Tallahassee, Florida 32301
 (404) 335-0714
brenda.slaughter@bellsouth.com
- B. Docket No.: 060684-TP Complaint and Petition for Declaratory Relief of Litestream Holdings, LLC against BellSouth Telecommunications, Inc.
- C. BellSouth Telecommunications, Inc.
 on behalf of E. Earl Edenfield, Jr.
- D. 4 pages total (includes letter, certificate of service and pleading)
- E. BellSouth Telecommunications, Inc.'s Unopposed Motion for Extension of Time

<<060684-TP Unopposed Motion Ext of Time.pdf>>

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ORIGINAL

Legal Department

E. EARL EDENFIELD, JR.
Senior Attorney

BellSouth Telecommunications, Inc.
150 South Monroe Street
Room 400
Tallahassee, Florida 32301
(404) 335-0763

October 27, 2006

Mrs. Blanca S. Bayó
Division of the Commission Clerk and
Administrative Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

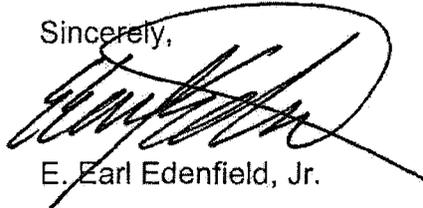
**Re: Docket No.: 060684-TP
Complaint and Petition for Declaratory Relief of Litestream Holdings, LLC
against BellSouth Telecommunications, Inc.**

Dear Ms. Bayó:

Enclosed is BellSouth's Unopposed Motion for Extension of Time, which we ask that you file in the captioned docket.

Copies have been served to the parties shown on the attached Certificate of Service.

Sincerely,



E. Earl Edenfield, Jr.

Enclosure

cc: All Parties of Record
Jerry D. Hendrix
James Meza III

DOCUMENT NUMBER-DATE

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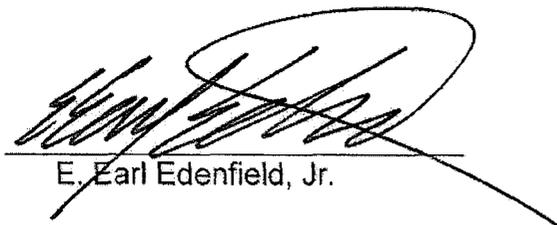
CERTIFICATE OF SERVICE
Docket No. 060684-TP

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via Electronic Mail and First Class U. S. Mail this 27th day of October, 2006 to the following:

Patrick Wiggins
Dale Buys
Jason Fudge
Staff Counsels
Florida Public Service
Commission
Division of Legal Services
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850
pwiggins@psc.state.fl.us
jfudge@psc.state.fl.us

Gray Robinson Law Firm
Gary Resnick
401 East Las Olas Blvd.
Fort Lauderdale, FL 33301
Phone: (957) 761-8111
Fax: 761-8112
gresnick@gray-robinson.com

Litestream Holdings, LLC
500 South Australian Avenue
Suite 120
West Palm Beach, FL 33401-6235
Phone: (561) 659-5400
Fax: (561) 659-5671
sally@rhodesholdings.net


E. Earl Edenfield, Jr.

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In the Matter of:)	
Complaint and Petition for Declaratory Relief of)	Docket No. 060684-TP
Litestream Holdings, LLC against BellSouth)	
Telecommunications, Inc.)	Filed: October 27, 2006
<hr/>		

BELLSOUTH'S UNOPPOSED MOTION FOR EXTENSION OF TIME

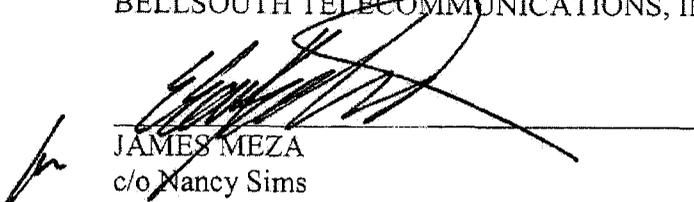
BellSouth Telecommunications, Inc. ("BellSouth") files this Unopposed Motion for Extension of Time and says:

1. On October 17, 2006, Litestream Holdings, LLC ("Litestream") filed a Complaint and Petition for Declaratory Relief ("Complaint") against BellSouth.
2. In accordance with Commission Rules, BellSouth's response to the Complaint is due on November 7, 2006.
3. Counsel for BellSouth has a number of upcoming conflicts and therefore needs additional time to prepare a response to the Complaint. Specifically, BellSouth needs time to research the facts and circumstances surrounding Litestream's allegations regarding the Glen St. John property so that BellSouth can prepare the appropriate response.
4. BellSouth seeks through and including November 17, 2006 in which the file a response to the Complaint.
5. Counsel has contacted counsel for Litestream and informs the Commission that Litestream's counsel has no objection to the requested extension.
6. No party would be negatively impacted by the Commission granting BellSouth's requested extension. Further there is currently no procedural schedule in place to be impacted.

WHEREFORE, BellSouth respectfully requests an extension of time through and including November 17, 2006 in which the file a response to the Complaint.

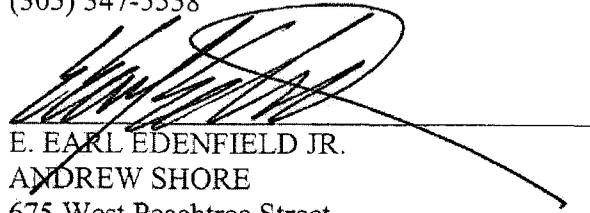
Respectfully submitted this 27th day of October 2006.

BELLSOUTH TELECOMMUNICATIONS, INC.



A handwritten signature in black ink, appearing to read 'James Meza', is written over a horizontal line. To the left of the signature, there is a small, separate handwritten mark.

JAMES MEZA
c/o Nancy Sims
150 South Monroe Street, Suite 400
Tallahassee, Florida 32301
(305) 347-5558



A handwritten signature in black ink, appearing to read 'E. Earl Edenfield Jr.', is written over a horizontal line.

E. EARL EDENFIELD JR.
ANDREW SHORE
675 West Peachtree Street
Suite 4300
Atlanta, Georgia 30375
(404) 335-0765

655508