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Ruth Nettles

From: Jennifer Washington [jennifer@fostermalish.com]
Sent: Monday, September 17, 2007 10:58 AM
To: Filings@psc.state.fl.us
Cc: pc0755@att.com; mg2708@att.com; Lee Eng Tan; Malish, Chris; Steven Tepera
Subject: Docket No. 050863-TP; dPi Teleconnect v. BellSouth - Cross Notice of Deposition

Attachments: Deposition notice of Pam Tipton.wpd; Cross notice depo.Pam Tipton.pdf



Deposition Cross notice
ice of Pam Tipton.Pam Tipton.

Please file the attached Cross Notice of Deposition and let me know if you need anything else. Thank you.

- A. Jennifer L. Washington, CP
Paralegal
Foster Malish Blair & Cowan, LLP
1403 West Sixth Street
Austin, TX 78703
(512) 476-8591
(512) 477-8657/fax
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- B. dPi Teleconnect, LLC v. BellSouth Telecommunications, Inc. - Docket No. 050863-TP
- C. dPi Teleconnect, LLC
- D. 4 pages including certificate of service
- E. Cross Notice of Deposition

<<Deposition notice of Pam Tipton.wpd>> <<Cross notice depo.Pam Tipton.pdf>>

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DOCUMENT NUMBER-DATE

08427 SEP 17 5

FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re:) DOCKET NO. 050863-TP
)
dPi Teleconnect, L.L.C. v.)
BellSouth Telecommunications, Inc.)

CROSS NOTICE OF DEPOSITION

To the parties who have appeared in the above cause of action, and their attorneys of record:

YOU ARE NOTIFIED that on Tuesday, September 18, 2007, at 9:30 a.m. or immediately following the deposition of Brian Bolinger, Plaintiff dPi Teleconnect, LLC, will take the oral deposition of Pam Tipton, designated representative of Defendant BellSouth Telecommunications, Inc., at Betty Easley Conference Center, 4075 Esplanade Way, Tallahassee, Florida. The deposition will continue from day to day until completed.

dPi Teleconnect, LLC, intends to examine deponent about the following matters at deposition:

- Pam Tipton's background and qualification;
- Pam Tipton's testimony in previous cases;
- Promotions offered BellSouth/AT&T Florida's end users since January 1, 2002;
- Promotions and promotional credits sought by dPi Teleconnect, LLC, whether denied or not since January 1, 2002, including reasons for denial;
- Promotions and promotional credits sought by CLECs other than dPi Teleconnect, LLC, since January 1, 2002;
- Qualifying criteria for promotions;
- Pre-filed testimony and rebuttal testimony of Pam Tipton in the above styled cause, including attached exhibits;
- Pricing and billing of BellSouth/AT&T Florida's end users, including amounts billed end users for basic service plus two blocks (repeat dialing block, call tracing block, and call return block);
- All legal and factual theories of BellSouth/AT&T Florida in this cause; and
- Internal training, billing dispute and crediting policies of BellSouth/AT&T Florida since January 1, 2002.

The Proof of Service attached to this notice contains a list of the parties and attorneys on whom this notice has been served.

DOCUMENT NO. DATE

08427-07 9/17/07
FPSC - COMMISSION CLERK

Respectfully Submitted,

FOSTER MALISH BLAIR & COWAN, LLP

/s/ Chris Malish

Chris Malish

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CERTIFICATE OF SERVICE

I hereby certify that true copy of the foregoing document has been served upon Defendant BellSouth through its below-listed attorneys on this 17th day of September, 2007.

/s/ Chris Malish
Christopher Malish

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