

**Marguerite McLean**

090313-PU

**From:** Tonya Simpson [TSimpson@RSBattorneys.com]  
**Sent:** Thursday, January 07, 2010 4:32 PM  
**To:** Filings@psc.state.fl.us  
**Cc:** Timisha Brooks  
**Subject:** DK 090313-PU  
**Attachments:** \_0107162839\_001.pdf

- a. F. Marshall Deterding, Esquire  
Rose, Sundstrom & Bentley, LLP  
2548 Blairstone Pines Drive  
Tallahassee, FL 32301  
PHONE: 877-6555
- b. Mad Hatter Utility, Inc./Paradise Lakes Utility, LLC Complaint Against Verizon; Docket No. 090313-PU
- c. Mad Hatter Utility, Inc./Paradise Lakes Utility, LLC
- d. 3 pages of the Response to Verizon's Request for Production

**Tonya M. Simpson**  
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1/7/2010

DOCUMENT NUMBER-DATE

00176 JAN-7 0

FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Complaint of Mad Hatter  
Utility, Inc. and Paradise Lakes  
Utility, LLC Against Verizon  
Florida, LLC.

Docket No. 090313

MAD HATTER UTILITY, INC. AND PARADISE LAKES UTILITY, LLC'S  
RESPONSE TO VERIZON FLORIDA LLC'S FIRST  
REQUEST FOR PRODUCTION OF DOCUMENTS

MAD HATTER UTILITY, INC. ("Mad Hatter") and PARADISE LAKES UTILITY, LLC. ("Paradise"), by and through their undersigned attorneys, hereby file their responses to Verizon Florida, LLC's First Request for Production of Documents pursuant to Rule 1.350, Fla.R.Civ.P. and responds as follows:

GENERAL OBJECTIONS

To the extent Verizon Florida, LLC's definition of "document" or "documents" exceeds that set forth in Rule 1.350 (a), Fla.R. Civ. P. , Mad Hatter and Paradise object.

RESPONSES

1. Please produce a complete set of all telephone bills received by Mad Hatter from Verizon for any one month during the period January 2008 to June 2009. Such documents should include bills for all services, including services (such as voice telephone services) that are not in dispute in this case.

The documents will be produced to the extent they exist.

2. Please produce a complete set of all telephone bills received by Paradise Lakes from Verizon for any one month during the period January 2008 to June 2009. Such documents should include bills for all services, including services (such as voice telephone services) that are not in dispute in this case.

The documents will be produced to the extent they exist.

DOCUMENT NUMBER-DATE  
0176 JAN-7 09  
FPSC-COMMISSION CLERK

3. Please produce all documents evidencing, reflecting or relating to any notification by Mad Hatter to Verizon that the telephone lines serving its water treatment plants were out of service or otherwise not functioning properly.

The documents will be produced to the extent they exist.

4. Please produce all documents evidencing, reflecting or relating to any notification by Paradise Lakes to Verizon that the telephone lines serving its water treatment plants were out of service or otherwise not functioning properly.

The documents will be produced to the extent they exist.

5. Please produce all documents evidencing, reflecting or relating to any notification by Mad Hatter to Verizon that the telephone lines serving its lift stations were out of service or otherwise not functioning properly.

The documents will be produced to the extent they exist.

6. Please produce any correspondence (including but not limited to electronic correspondence) between Mad Hatter and Verizon.

The documents will be produced to the extent they exist.

7. Please produce any correspondence (including but not limited to electronic correspondence) between Paradise Lakes and Verizon.

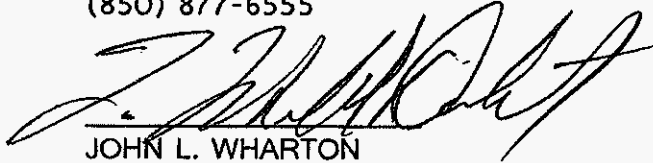
The documents will be produced to the extent they exist.

8. Please produce any other documents evidencing, reflecting or relating to the claims asserted by Mad Hatter and Paradise Lakes in this case.

The documents will be produced to the extent they exist.

Respectfully submitted on this  
7th day of January, 2010, by:

ROSE, SUNDSTROM & BENTLEY, LLP  
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(850) 877-6555



JOHN L. WHARTON  
FL Bar ID No. 563099  
F. MARSHALL DETERDING  
FL Bar ID No. 515876  
For the Firm

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished via email  
and U.S. Mail this 7th day of January, 2010, to:

Dulaney L. O'Roark, III  
PO Box 110 MC FLTC0007  
Tampa, Florida 33601-0110  
813-204-8870 Fax

Timisha Brooks  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850  
413-6213



JOHN L. WHARTON

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