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Mark Richard
Attorney At Law

**ORIGINAL
FILE COPY**

September 8, 1994

Florida Public Service Commission
Division of Records and Reporting
101 East Gaines Street
Tallahassee, Florida 32301

1994 SEP 12 AM 8:07
MAIL ROOM

Re: Docket No. 920260-TL

Dear Sir or Madam:

Enclosed please find an original and fifteen (15) copies of my clients' Motion to Compel and my clients' Motion to Reset Hearing and Motion for Clarification with respect to the referenced action. Please file same.

Thank you.

✓
CK _____
FA John
PP _____
AF _____
SMU Norton
DTR _____
EAG _____
LEG Hatch
LIM 6 ewa/psc.5
CFO _____
RDR Vinson
SEC 1
WAS _____
OTH _____

MR:bes
Enclosures

RECEIVED & FILED
Mus
FPSC BUREAU OF RECORDS

Sincerely,

Mark Richard Bes

Mark Richard

Dictated By Mark Richard
But Signed in His Absence
To Avoid Delay.

Motion to Compel
DOCUMENT NUMBER-DATE
09358 SEP 12 5
FPSC-RECORDS/REPORTING

Motion to Reset
DOCUMENT NUMBER-DATE
09359 SEP 12 5
FPSC-RECORDS/REPORTING

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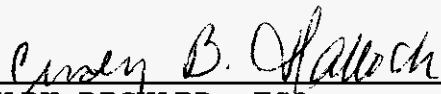
decision dismissing CWA's appeal.) In addition, the Petitioner requested at the prehearing conference that the discovery time would be adapted so as not to prejudice the parties opportunity for discovery.

4. Southern Bell has filed numerous motions in order to prevent the CWA from any discovery in this matter.

5. Southern Bell's failure or refusal to respond to the Request for Production and reset the deposition of Joseph Lacher is without substantial justification.

6. Petitioner has made all efforts possible to resolve this matter. Southern Bell has failed to respond to any of CWA's offers to resolve these or any other matters.

WHEREFORE, Plaintiff respectfully requests this Court enter an Order compelling Southern Bell to respond to Plaintiff's Request for Production and compel the taking of Joseph Lacher's deposition.



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Certificate of Service

I HEREBY CERTIFY that a true and correct copy of the foregoing Motion to Compel Production was mailed to those individuals named on the attached distribution list on this 3rd day of September, 1994.

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cwa/psc/compel.mot

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