Messer, Caparello & Self

A Professional Association

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

February 25, 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. 030696-TI

Dear Ms. Bayó:

Enclosed for filing on behalf of 9278 Communications, Inc. are an original and fifteen copies of 9278 Communications, Inc.'s Motion for Extension of Time in the above referenced docket.

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.

Sincerely yours,

Norman H. Horton, Jr.

NHH/amb Enclosures

cc: Parties of Record

DOCUMENT NUMBER-DATE

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Compliance investigation of 9278)	
Communications, Inc. for apparent violation)	Docket No. 030696-TI
of Sections 364.02 and 364.04, Florida Statutes.)	Filed: February 25, 2005
)	

MOTION FOR EXTENSION OF TIME

COMES NOW, 9278 Communications, Inc. ("9278") and requests an extension of time to file responses to discovery as basis, 9278 would state:

- 1. On February 8, 2005, Staff served its First Set of Interrogatories and Request for Production of Documents by U. S. Mail on 9278 Communications. The Order Establishing Procedure, issued January 28, 2005, directed that discovery requests be served by e-mail and that responses would be due 20 days from service with no additional time for mailing. On the basis of this, responses are due February 28, 2005.
- 2. 9278 requests an additional 10 days to respond to the Interrogatories and Document Production. Preparing the responses requires reviewing records and transaction for actions that occurred two years ago and is a time consuming process..
- 3. Granting the extension will not cause any inconvenience or result in a delay of this case. The present schedule has Staff Testimony due the same day as the responses are due thus it would into seem that the responses are critical to the preparation of that testimony. The hearing is scheduled for June so there is adequate time to review the responses even with the extension.
- 4. Counsel for 9278 has contacted the Staff Attorney and left a message with him that the request would be forthcoming.

WHEREFORE, 9278 Communications, Inc.'s herewith requests an extension of 109 days to file its responses to discovery.

Respectfully submitted,

MESSER, CAPARELLO & SELF, P.A. 215 S. Monroe Street, Suite 701 Post Office Box 1876 Tallahassee, FL 32302-1876 (850) 222-0720

NORMAN H. HORTON, JR., ESQ.

Attorneys for 9278 Communications, Inc.

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 25th day of February, 2005.

Jason Rojas, Esq.* General Counsel's Office, Room 370 Florida Public Service Commission 2540 Shumard Oak Blvd. Tallahassee, FL 32399-0850

Mr. Dale R. Buys*
Division of Competitive Markets and Enforcement
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

Norman H. Horton, Jr.