

Marguerite McLean

090313-PU

From: Tonya Simpson [TSimpson@RSBattorneys.com]
Sent: Thursday, December 31, 2009 12:01 PM
To: Filings@psc.state.fl.us
Cc: Timisha Brooks
Subject: DK 090313-PU
Attachments: _1231115620_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 page Notice of Deposition

Tonya M. Simpson
Assistant to F. Marshall Deterding
Rose, Sundstrom & Bentley, LLP
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Tallahassee, Florida 32301
(850) 877-6555 PHONE
(850) 656-4029 FAX

12/31/2009

DOCUMENT NUMBER-DATE

12280 DEC 31 8

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-PU

TO: Dulaney L. O’Roark, III
P.O. Box 110, MC FLTC0007
Tampa, Florida 33601-0110

NOTICE OF TAKING DEPOSITION

PLEASE TAKE NOTICE that the deposition of Verizon Florida, LLC will be taken by oral examination at the times and dates indicated below pursuant to Rule 1.310(b)(6), Florida Rules of Civil Procedure. The depositions will be conducted before a Court Reporter or before their duly designated representative who is not of counsel to the parties or interested in the event of the cause, for the purpose of discovery, for use at trial, or for such other purposes as are permitted under the Florida Rules of Civil Procedure, Florida Administrative Code, and Florida Statutes. Please govern yourself accordingly.

The matters on which examination is requested are:

- The circumstances and facts surrounding the under road boring by Verizon or its agents or contractors at 1638 or near Osprey Lane, Lutz, Florida and the subsequent inspection of the collapsed road at that location several months later, on or about August 17, 2007.

DOCUMENT NUMBER-DATE

12280 DEC 31 8

FPSC-COMMISSION CLERK

- The circumstances and facts surrounding the initiation of what Verizon's witnesses have referred to as "alarm monitoring services" provided to Mad Hatter Utility, Inc. in 1995 and the discontinuance of those services in approximately 1995 or 1996.
- The circumstances and facts surrounding the billing to Mad Hatter Utility, Inc. for which Verizon has termed "alarm monitoring services" in all periods from 1995 until 2009 and any records concerning agreements for service or requests for such services obtained by Verizon from Mad Hatter Utility, Inc. or its agents.

LOCATION:

201 N. Franklin Street
(adjoins Hyatt Regency)
37th Floor Conference Room
Tampa, Florida 33602

DATE AND TIME:

January 8, 2010
1:30 p.m. EST

Please contact Terry Scobie at 813-483-2610 for access to the 37th floor.

Dated this 31st day of December, 2009.



JOHN L. WHARTON
Florida Bar #563099
F. MARSHALL DETERDING
Florida Bar #515876
ROSE, SUNDSTROM & BENTLEY, LLP
2548 Blairstone Pines Drive
Tallahassee, FL 32301
(850) 877-6555

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by U.S Mail and Email this 31st day of December, 2009, to:

Timisha Brooks, Esquire
General Counsel
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida

Dulaney L. O'Roark, III
P.O. Box 110, MC FLTC0007
Tampa, Florida 33601-0110



JOHN L. WHARTON