



Commissioners

SHEILA LUMPE
Chair

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ROBERT G. SCHEMENAUER

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Missouri Public Service Commission

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August 17, 1999

GORDON L. PERSINGER
Acting Executive Director
Director, Research and Public Affairs

WESS A. HENDERSON
Director, Utility Operations

ROBERT SCHALLENBERG
Director, Utility Services

DONNA M. KOLILIS
Director, Administration

DALE HARDY ROBERTS
Secretary/Chief Regulatory Law Judge

DANA K. JOYCE
General Counsel

Mr. Dale Hardy Roberts
Secretary/Chief Regulatory Law Judge
Missouri Public Service Commission
P. O. Box 360
Jefferson City, MO 65102

RE: TA-2000-35

Dear Mr. Roberts:

Enclosed for filing in the above-captioned case are an original and fourteen (14) conformed copies of a **STAFF'S MOTION FOR LEAVE TO LATE FILE RESPONSE**.

This filing has been mailed or hand-delivered this date to all counsel of record.

Thank you for your attention to this matter.

Sincerely yours,

Nathan Williams
Assistant General Counsel
(573) 751-8702
(573) 751-9285 (Fax)

NW/jb
Enclosure
cc: Counsel of Record

FILED

AUG 17 1999

Missouri Public
Service Commission

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

FILED

AUG 17 1999

**Missouri Public
Service Commission**

In the Matter of the Application of Grand)	
River Communications, Inc., d/b/a)	
Lathrop Long Distance, for a Certificate)	Case No. TA-2000-35
of Service Authority to Provide)	
Interexchange and Local Exchange)	
Telecommunications Services.)	

STAFF'S MOTION FOR LEAVE TO LATE FILE RESPONSE

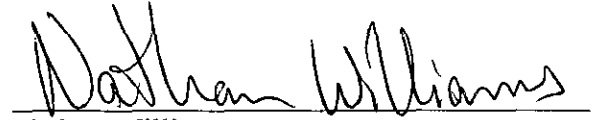
Comes now the Staff of the Missouri Public Service Commission, by counsel, and moves the Commission to accept filing of the Staff's Response to AT&T Communications of the Southwest, Inc.'s (AT&T) Application to Intervene and Motion to Consolidate filed in the above case on the grounds following:

1. Members of Staff and General Counsel's Office were in training classes August 12 and 13, 1999, and unavailable for preparing a response to the above pleading;
2. Two weekends are within the ten day period allotted for timely response by 4CSR240.080(12);
3. The Staff is not seeking additional time to respond for the purpose of delay or to hinder prosecution of this matter but, rather, to adequately and properly respond; and
4. No party should suffer prejudice by a delay of one day in the filing of the Staff's response.

WHEREFORE, the Staff respectfully moves the Commission to accept late filing of the Staff's response to AT&T Communications of the Southwest, Inc.'s pleading titled "Application to Intervene and Motion to Consolidate" filed in the above-captioned case.

Respectfully submitted,

DANA K. JOYCE
General Counsel

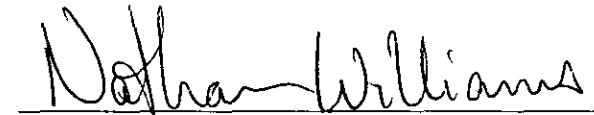
A handwritten signature in cursive script, reading "Nathan Williams", written over a horizontal line.

Nathan Williams
Assistant General Counsel
Missouri Bar No. 35512

Attorney for the Staff of the
Missouri Public Service Commission
P. O. Box 360
Jefferson City, MO 65102
(573) 751-8702 (Telephone)
(573) 751-9285 (Fax)

Certificate of Service

I hereby certify that copies of the foregoing have been mailed or hand-delivered to all counsel of record as shown on the attached service list this 17th day of August, 1999.

A handwritten signature in cursive script, reading "Nathan Williams", written over a horizontal line.

Service List for
Case No. TA-2000-35
Revised: August 17, 1999

Office of Public Counsel
P.O. Box 7800
Jefferson City, MO 65102

Paul DeFord
Lathrop & Gage, L.C.
2345 Grand Boulevard, Suite 2800
Kansas City, MO 64108

Sondra B. Morgan
Brydon, Swearingen & England
312 E. Capitol Avenue, P.O. Box 456
Jefferson City, MO 65102

Kevin K. Zarling
AT&T Communication of the Southwest, Inc.
919 Congress, Suite 900
Austin, Texas 78701