

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

The Staff of the Missouri Public Service Commission)	
)	
)	
Complainant,)	
)	
v.)	
)	File No: TC-2013-0194
Halo Wireless, Inc.)	
Transcom Enhanced Services, Inc.)	
)	
Respondents.)	

MOTION FOR STAY OF MAY 28 DEADLINE

Comes now Transcom Enhanced Services, Inc. (“Transcom”), by its undersigned counsel, and for its Motion for Stay of May 28 Deadline states as follows:

1. On October 16, 2012 the Staff of the Missouri Public Service Commission (“Staff”) filed the above referenced Complaint against Halo Wireless, Inc. (“Halo”) and Transcom.
2. Transcom filed a timely Answer to the Complaint and a Motion to Dismiss the Complaint on April 15, 2013.
3. On April 25, 2013, the Staff filed a Motion for Default Judgment, Summary Determination and Response to Respondent’s Motion and Answer. Transcom’s Response to the pleading is due on May 28, 2013.
4. The parties have been negotiating in good faith to resolve their issues and the parties are currently negotiating a Stipulation and Agreement that would resolve the issues in the Complaint.
5. Therefore, Transcom respectfully requests that the Commission stay

Transcom's deadline for a responsive pleading to allow the parties to complete their negotiations.

6. The staff has no objection to the stay.

WHEREFORE, Transcom respectfully requests that the Commission issue its Order granting a stay of the due date of Transcom's responsive pleading to the Staff's Motion and grant such other relief as is reasonable in the circumstances.

Respectfully submitted,

/s/ Catherine L. Hanaway

CATHERINE L. HANAWAY

Missouri Bar No. 41208

ASHCROFT HANAWAY, LLC

222 S. Central Ave.; Suite 110

St. Louis, Missouri 63105

Phone: 314.863.7001

Fax: 314.863.7008

STEVEN H. THOMAS

Texas State Bar No. 19868890

MCGUIRE, CRADDOCK & STROTHER, P.C.

2501 N. Harwood, Suite 1800

Dallas TX 75201

Phone: 214.954.6800

Fax: 214.954.6850

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing was served on the following via electronic mail on this 15th day of May, 2013.

Kevin Thompson, Chief Staff Counsel
Staff of Missouri Public Service Commission
200 Madison Street, Suite 800
P.O. Box 360
Jefferson City, MO 65102
kevin.thompson@psc.mo.gov
gencounsel@psc.mo.gov

Lewis Mills
Office of Public Counsel
200 Madison Street, Suite 650
P.O. Box 2230
Jefferson City, MO 65102
opcservice@ded.mo.gov
lewis.mills@ded.mo.gov

/s/ Catherine L. Hanaway
Catherine L. Hanaway