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May 9, 2002

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The Honorable Dale Hardy Roberts Secretary/Chief Regulatory Law Judge Missouri Public Service Commission P.O. Box 360 Jefferson City, MO 65102-0360

Re:

ROBERT K. ANGSTEAD

CATHLEEN A. MARTIN

STEPHEN G. NEWMAN

ALICIA EMBLEY TURNER

MARK W. COMLEY

JOHN A. RUTH

Case No. TC-2002-194

Dear Judge Roberts:

Please find enclosed for filing in the above-referenced matter the original and eight copies of Opposition to Motion for Entry of Standard Protective Order and Motion for Entry of Alternative Protective Order, along with a Motion to File Suggestions in Opposition to Motion for Entry of Standard Protective Order Out of Time.

Please contact me if you have any questions regarding this filing. Thank you.

Very truly yours,

NEWMAN, COMLEY & RUTH P.C.

By:

comleym@ncrpc.com

MWC:ab Enclosure

cc:

Office of Public Counsel General Counsel's Office

Rebecca DeCook

All Counsel of Record

BEFORE THE PUBLIC SERVICE COMMISSION STATE OF MISSOURI

Alma Telephone Company, et al.,)	
Petitioners,)	
•)	
v.)	Case No. TC-2002-194
)	
Southwestern Bell Telephone Company,)	
et al.,)	
D 1 /)	
Respondents.)	

MOTION TO FILE SUGGESTIONS IN OPPOSITION TO MOTION FOR ENTRY OF STANDARD PROTECTIVE ORDER OUT OF TIME

COMES NOW AT&T Communications of the Southwest, Inc. ("AT&T"), by and through its undersigned counsel, and pursuant to 4 CSR 240-2.050 (3) requests that the Commission accept for filing out of time AT&T's Suggestions in Opposition to Motion for Entry of Standard Protective Order. In support thereof, AT&T submits the following:

- 1. On April 25, 2002, the Petitioners filed for Commission consideration a Motion for Protective Order which requested issuance of the Commission's "standard" protective order. Under Commission rules, a response to Petitioners' Motion was due on or before May 5, 2002.
- 2. Under cover of this motion, the Commission will find AT&T's Suggestions in Opposition to Petitioners' Motion and AT&T's own motion for approval of an alternative protective order.
- 3. AT&T's opposing suggestions are out of time. Every effort was undertaken by counsel to file them within the period prescribed by the rule, but the process of preparing the response and the motion for approval of an alternative protective order unexpectedly required more

time than allowed by the rule.

This request is made not for the purpose of delaying this cause but rather is the result of excusable neglect.

WHEREFORE, AT&T requests that the Commission accept for filing out of time AT&T's Suggestions in Opposition to Motion for Entry of Standard Protective Order.

Respectfully submitted,

Rebecca B. DeCook

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