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September 22, 2000

VIA HAND DELIVERY

FILED
SEP 22 2000

Missouri Public
Service Commission

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

Re: Stone County Emergency Services v. GTE Midwest Incorporated (n/k/a Verizon) and
Southwestern Bell Telephone Company
Case No.: TC-2000-767

Dear Mr. Roberts:

Enclosed for filing in the above referenced matter, please find Motion for Leave to Amend
Complaint and File First Amended Complaint.

Please contact me with any questions. Thank you.

Very truly yours,

GIBBS LAW OFFICE, P.C.



Scott R. Pool
E-mail: Pool@gibbslaw.net

SRP:ch

Enclosure

cc: Mark Rundel
James Fischer
Mimi B. MacDonald
Michael F. Dandino
Dana K. Joyce
Malcome Vedane

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

FILED

SEP 22 2000

Missouri Public
Service Commission

Stone County Emergency Services,)
)
Complainant,)
)
vs.)
)
GTE Midwest Incorporated and)
Southwestern Bell Telephone Company,)
)
Respondents.)

Case No.: TC-2000-767

**MOTION FOR LEAVE TO AMEND COMPLAINT AND FILE FIRST AMENDED
COMPLAINT**

COMES NOW, Complainant, Stone County Emergency Services, by and through its attorneys, Gibbs Law Office, P.C., and pursuant to 4 CSR 240-2.080(21), respectfully requests leave of this Commission to amend its Complaint and file its First Amended Complaint. For its cause, Complainant respectfully states to this Commission as follows:

1. The Complaint in this matter was originally filed by attorney Mark Rundel on or about May 17, 2000.
2. Responsive pleadings thereto were filed by GTE and SWB.
3. On or about August 10, 2000, Complainant, along with GTE and SWB appeared before this Commission for a prehearing conference. At that pre-hearing conference this Commission granted Plaintiff leave to amend this Complaint by Interlineation. Responsive pleadings by SWB were filed thereto.
4. Thereafter, the Complainant, both Respondents, along with a representative of the Public Counsel and a representative of the Public Service Commission and two staff investigators met after the pre-hearing conference. Concerns were raised by the parties about the lack of

specificity of Complainants original Complaint. Additionally, Data Request number 2602 specifically requested clarification regarding Complainant's allegations that GTE and SWB failed to provide 911 services to certain customers in Stone County.

5. Leave to file an Amended Complaint is necessary pursuant to 4 CSR 240-2.080(21).

6. Complainants First Amended Complaint does not create any new issues and/or controversies between the parties but instead attempts to clarify and provide greater specificity with respect to the issues and controversies between the parties.

7. No party should incur any prejudice as a result of this requested relief.

8. Complainants First Amended Complaint is attached hereto and incorporated herein by reference.

WHEREFORE, Complainant respectfully requests this Commission to grant it leave to amend its Complaint and file the attached First Amended Complaint and for any further relief this Commission may deem necessary and proper under the circumstances.

Respectfully submitted,

GIBBS LAW OFFICE, P.C.



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Attorneys for Complainant.

CERTIFICATE OF SERVICE

I hereby certify that I served a copy of the foregoing document by mailing and faxing a true copy thereof on September 22, 2000, to the following:

Mr. James Fischer
Fischer & Dority, P.C.
101 Madison Street, Suite 400
Jefferson City, MO 65101

Ms. Mimi B. MacDonald
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Mr. Michael F. Dandino
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