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July 12, 2001

**VIA FEDERAL EXPRESS**

Mr. Dale Roberts  
Executive Secretary  
Missouri Public Service Commission  
200 Madison Street, Suite 100  
Jefferson City, Missouri 65101

**FILED<sup>2</sup>**  
JUL 13 2001  
Missouri Public  
Service Commission

Re: Joint Application of Claricom Networks, Inc., Claricom Holdings, Inc., Staples, Inc., Stacom Holdings, LLC and Platinum Equity, LLC for Approval of the Transfer of Stock in Claricom Holdings, Inc. to Stacom Holdings, Inc.  
Case No. ~~TX~~-2001-669  
**TM-**

Dear Mr. Roberts:

Enclosed for filing with the Commission are nine copies of the Applicants' Response to Staff's Motion to Dismiss Application. Please return to me one filed copy in the enclosed envelope.

If you should have any questions, please do not hesitate to contact me.

Very truly yours,

*Trina R. LeRiche*

Trina R. LeRiche

TRL/lsc

Enclosures

cc : Office of Public Counsel (w/encl.)  
Office of General Counsel (w/encl.)  
Marc D. Poston, Esq. (w/encl.)

BEFORE THE PUBLIC SERVICE COMMISSION  
STATE OF MISSOURI

FILED<sup>2</sup>  
JUL 13 2001

Missouri Public  
Service Commission

Joint Application of )  
Claricom Networks, Inc., Claricom )  
Holdings, Inc., Staples, Inc., Stacom )  
Holdings, LLC, and )  
Platinum Equity, LLC for Approval of )  
the Transfer of Stock in Claricom )  
Holdings, Inc. to Stacom Holdings, Inc. )

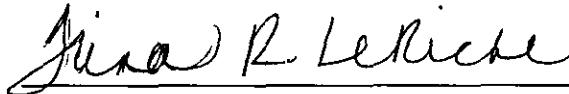
Case No. TM-2001-669

**APPLICANTS' RESPONSE TO STAFF'S  
MOTION TO DISMISS APPLICATION**

Claricom Networks, Inc., Claricom Holdings, Inc., Staples, Inc., Stacom Holdings, LLC, and Platinum Equity, LLC ("Applicants") for its Response to Staff's Motion to Dismiss Application, state that Applicants have no objection to dismissing the Joint Application for Approval of the Transfer of Stock for lack of jurisdiction.

Respectfully Submitted,

SONNENSCHN NATH & ROSENTHAL



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ATTORNEYS FOR PLATINUM EQUITY, LLC

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on this 12<sup>th</sup> day of July, 2001, two true and correct copies of the above and foregoing was mailed, postage prepaid, to:

Michael Dandino  
Office of Public Counsel  
Missouri Public Service Commission  
200 Madison Street  
Suite 650  
Jefferson City, MO 65101

With one copy being mailed postage prepaid, on the same date to:

William K. Haas  
Office of General Counsel  
Missouri Public Service Commission  
200 Madison Street  
Suite 800  
Jefferson City, MO 65101

Marc D. Poston  
Senior Counsel  
Missouri Public Service Commission  
P.O. Box 360  
Jefferson City, MO 65102

  
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ATTORNEYS FOR APPLICANTS