

**BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION**

Socket Telecom, LLC,	)	
	)	
Complainant,	)	
	)	
v.	)	<b>Case No. TC-2007-0341</b>
	)	
CenturyTel of Missouri, LLC dba	)	
CenturyTel and Spectra Communications	)	
Group, LLC dba CenturyTel	)	
	)	
Respondents.	)	

**SOCKET’S REPLY TO RESPONDENTS’ RESPONSE TO CROSS MOTION  
FOR SUMMARY DETERMINATION**

COMES NOW Socket Telecom, LLC (Socket), pursuant to 4 CSR 240-2.117 and 2.080(15), and for its Reply to Respondents’ Response to Cross Motion for Summary Judgment states to the Commission:

1. Respondents did not set forth any additional facts in their Response. Nonetheless, out of an abundance of caution Socket denies the contents of Respondents’ Response except to the extent such Response expressly admits actual averments fact in Socket’s Cross Motion.

2. In further reply, Socket incorporates by reference its Cross Motion and the Memorandum of Law submitted in support thereof.

WHEREFORE, Socket moves the Commission as expeditiously as possible to: 1) deny Respondents’ Motion to Dismiss; 2) deny Respondents’ Motion for Summary Determination; 3) grant Socket’s Motion for Summary Determination; and 4) grant such

other and further relief to Socket as the Commission deems just and proper in the premises.

Respectfully submitted,

CURTIS, HEINZ,  
GARRETT & O'KEEFE, P.C.

/s/ Carl J. Lumley

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### **Certificate of Service**

A true and correct copy of the foregoing was served upon the parties identified on the attached service list on this 19th day of July, 2007, by email or by placing same in the U.S. Mail, postage paid.

/s/ Carl J. Lumley

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