

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

An Investigation of the Fiscal and)	
Operational Reliability of Cass County)	
Telephone Company and New Florence)	Case No. TO-2005-0237
Telephone Company, and Related Matters)	
of Illegal Activity.)	

MOTION FOR ISSUANCE OF A PROTECTIVE ORDER

Comes now Cass County Telephone Company ("Cass County") and New Florence Telephone Company ("New Florence") and move the Missouri Public Service Commission ("Commission") to issue its standard-form protective order in the above-referenced case. In support thereof, Cass County and New Florence respectfully state to the Commission as follows:

1. On January 14, 2005, the Commission issued an Order Establishing Investigation Case in which it directed its Staff to investigate all matters pertaining to the operations of Cass County and New Florence. The Commission directed its Staff to undertake any discovery, audit, investigation or other action it deemed appropriate to investigate the financial and operational status of any certificated company in which Mr. Kenneth Matzdorff had any ownership interest.

2. Cass County and New Florence anticipate that during the investigation of these companies and any subsequent discovery, the Staff will request that the companies provide information regarding business and financial matters as well as employee and customer information related to both CassTel and New Florence that the companies deem "proprietary"

or "highly confidential." CassTel and New Florence therefore request that the Commission issue a Protective Order so that documents and information may be filed in this case using the "proprietary" and "highly confidential" designations.

3. CassTel and New Florence anticipate that none of the information for which a claim of confidentiality will be made can be found in any format in any other public document.

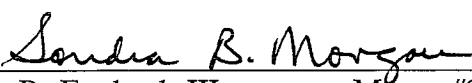
4. Therefore, because of the potential for public disclosure of such information without a protective order in place, CassTel and New Florence move the Commission to issue its standard-form protective order containing classifications of "highly confidential" and "proprietary."

WHEREFORE, CassTel and New Florence respectfully request that the Commission:

(a) issue the Commission's standard-form protective order containing classifications of "highly confidential" and "proprietary" to guide the parties' conduct in this case; and,

(b) grant such further relief as the Commission deems appropriate.

Respectfully submitted,


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Attorneys for CassTel Telephone Company and
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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing document was sent by U.S. Mail, postage prepaid, hand-delivered or sent by electronic transmission on this 17th day of February, 2005, to the following parties:

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