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April 29, 2004

**FILED<sup>2</sup>**  
APR 29 2004  
Missouri Public  
Service Commission

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

Re: The Staff of the Missouri Public Service Commission v.  
Lockheed Martin Global Telecommunications Services, Inc.  
Case No. TC-2004-0415

Dear Judge Roberts:

Enclosed for filing in the referenced matter please find the original and five copies of a Motion for Extension of Time to Respond to Staff's Motion for Summary Determination.

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

Very truly yours,

NEWMAN, COMLEY & RUTH P.C.

By:

  
Mark W. Comley  
comleym@ncrpc.com

MWC:kjh  
Enclosure

cc: Office of Public Counsel  
David Meyer  
Winafred Brantl

BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI

FILED<sup>2</sup>

APR 29 2004

Missouri Public  
Service Commission

The Staff of the Missouri Public Service  
Commission, )

Complainant, )

Case No. TC-2004-0415

v. )

Lockheed Martin Global  
Telecommunications Services, Inc., )

Respondent. )

In the Matter of Lockheed Martin Global  
Telecommunications Services, Inc.'s 2002  
Annual Report to the Commission as an  
Interexchange Telecommunications  
Carrier, )

Case No. XE-2004-0488

**MOTION FOR EXTENSION OF TIME TO RESPOND TO STAFF'S MOTION  
FOR SUMMARY DETERMINATION**

COMES NOW Lockheed Martin Global Telecommunications Services, Inc. (LMGTS or Company) and pursuant to 4 CSR 240-2.050(3)(A) requests an extension of time within which to respond to Staff's motion for summary determination. In support thereof, LMGTS submits the following:

1. On or about April 1, 2004, Staff filed two motions in the same pleading; it moved to consolidate the above captioned cases and moved for summary disposition of the complaint case. LMGTS has previously submitted a response to Staff's motion to consolidate. Under 4 CSR 240-2.117 (B), LMGTS's response in opposition to Staff's motion for summary determination is due not more than thirty (30) days after filing. A response to Staff's motion is therefore due on or before April 30, 2004.

2. Despite their efforts to have a response to Staff's motion by the rule's deadline, LMGTS and its attorneys need additional time within which to respond. Attorneys for the Company and its chief officers have been engaged unavoidably in matters that could not be set aside to focus fully on the response. LMGTS needs an additional ten days within which to file a response to Staff's motion for summary relief.

3. Counsel for the Staff has no objection to LMGTS's request for additional time.

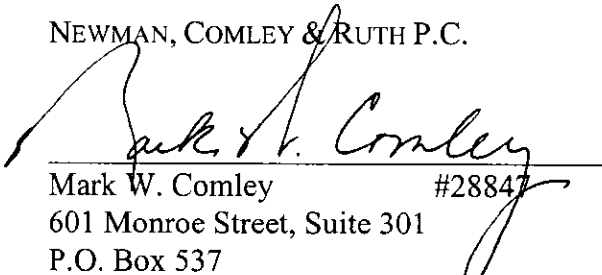
4. The extension sought will not prejudice any party to the action and will not unfairly delay the disposition of this cause.

WHEREFORE, LMGTS respectfully requests the Commission to issue an Order extending the time within which it may file a response to Staff's motion for summary determination for ten days, up to and including May 10, 2004.

Respectfully submitted,

NEWMAN, COMLEY & RUTH P.C.

By:

  
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Attorneys for Respondent

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, to **david.meyer@psc.mo.gov**, and Office of Public Counsel at **opcservice@ded.state.mo.us**, on this 29<sup>th</sup> day of April, 2004.