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October 12, 2004

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

**FILED**

OCT 12 2004

Missouri Public  
Service Commission

Re: Intelcom, Inc.  
Case No. TC-2004-0377

Dear Judge Roberts:

Please find the original and eight copies of a Motion to Withdraw and Motion for Additional Time to Respond to Complaint.

Thank you very much for your attention to this matter.

Sincerely,

NEWMAN, COMLEY & RUTH P.C.

By:



Cathleen A. Martin  
cmartin@ncrpc.com

CAM:ab  
Enclosure

cc: Office of Public Counsel  
Robert S. Berlin  
Kassi Avion

BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI

FILED

OCT 12 2004

Missouri Public  
Service Commission

The Staff of the Missouri Public Service )  
Commission, )  
 )  
Complainant, )  
v. )  
 )  
Intelcom, Inc., )  
 )  
Respondent. )

Case No. TC-2004-0377

**MOTION TO WITHDRAW AND**  
**MOTION FOR ADDITIONAL TIME TO RESPOND TO COMPLAINT**

COMES NOW Cathleen A. Martin of Newman, Comley & Ruth P.C. and requests permission to withdraw as attorney of record for Intelcom, Inc. ("Respondent") in the above-referenced cause for the Respondent's failure to cooperate with counsel. To ensure that Respondent is not prejudiced by the withdrawal of its counsel, the undersigned requests that the Commission grant Respondent additional time through October 29, 2004 to respond to the Complaint and to find substitute counsel or until some other disposition is made of this matter. No other parties will be prejudiced should counsel be allowed to withdraw from this matter.

WHEREFORE, the undersigned requests the Commission to grant her leave to withdraw from this matter and grant Respondent additional time through October 29, 2004 to respond to the Complaint and to find substitute counsel or until some other disposition is made of this matter.

Respectfully submitted,

NEWMAN, COMLEY & RUTH P.C.

By:   
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Certificate of Service

I hereby certify that a true and correct copy of the above and foregoing document was sent via e-mail on this 12<sup>th</sup> day of October, 2004, to General Counsel's Office at [gencounsel@psc.state.mo.us](mailto:gencounsel@psc.state.mo.us); Office of Public Counsel at [opcservice@ded.state.mo.us](mailto:opcservice@ded.state.mo.us).

  
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