

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

The Staff of the Missouri Public Service Commission,)	
)	
Complainant,)	
)	
vs.)	File No. TC-2013-0194
)	
Halo Wireless, Inc., and)	
Transcom Enhanced Services, Inc.)	
Respondents.)	

**TRANSCOM ENHANCED SERVICES, INC.'S MOTION
TO EXTEND DEADLINE TO FILE RESPONSIVE PLEADINGS**

COMES NOW, Transcom Enhanced Services, Inc. ("Transcom") and moves to extend the deadline for all parties to file an answer or other pleadings responsive to the Complaint ("Complaint") of the Staff of the Missouri Public Service Commission ("Commission")¹ filed in this case based on the following:

On October 16, 2012, the Staff initiated this proceeding by filing the Complaint. On October 22, 2012, the Commission entered its Order Giving Notice of Contested Case and Establishing Deadline for Answers ("Order"). The Order set the deadline for filing an answer or other pleading responsive to the Complaint as November 21, 2012. Since the filing of the Complaint, Transcom has been diligently searching for new counsel with expertise in handling the type of matters raised in the Complaint. Transcom first met with undersigned counsel on November 13, 2012.

Transcom respectfully requests that the Commission enter an order extending the deadline for all parties to file an answer or other responsive pleadings in this matter for sixty

¹ Transcom objects to the jurisdiction of the Commission in this matter and expressly reserves its objection to the Commission's exercise of jurisdiction over Transcom. Transcom further reserves the other objections and defenses it intends to assert in its responsive pleadings.

days until January 15, 2013 because undersigned counsel has not yet had the opportunity to review the record of the prior proceeding before the Commission (Case No. TC-2012-0331), which forms the basis of this case (the “Blocking Proceeding”). As the Commission is aware, the record of the Blocking Proceeding involves voluminous amounts of pleadings, testimony, evidence, hearing transcripts, briefing, and orders that will require a significant amount of time to review and analyze in order to be able to fully respond to the Staff’s allegations in the Complaint. Additionally, because the other party in this matter, Halo Wireless, Inc. (“Halo”), is in bankruptcy and under the control of a Chapter 7 Trustee, undersigned counsel needs time to coordinate with the Chapter 7 Trustee for Halo regarding the defense of this matter.

Transcom submits that the extension sought herein will not cause any prejudice or significant delay to the Staff or any other party because the Commission has already entered an order in the Blocking Proceeding authorizing blocking of the type of traffic that is the subject of the present case. Further, undersigned counsel spoke with Staff Counsel, Colleen M. Dale, on November 15, 2012, and she advised that Staff would not object to the extension being sought herein.

WHEREFORE, premises considered, Transcom prays that the Commission enter an order extending the deadline for all parties to file responsive pleadings in this matter for sixty days until January 15, 2013.

Respectfully submitted,

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing was served on the following via electronic mail or certified and regular mail on this 16th day of November, 2012.

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