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November 4, 2003

Secretary of the Commission  
Missouri Public Service Commission  
P. O. Box 360  
Jefferson City, MO 65102

FILED

NOV 04 2003

Re: TO-2003-0531

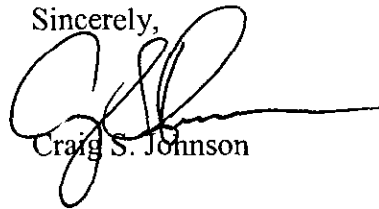
Missouri Public  
Service Commission

Dear Secretary:

Enclosed for filing please find an original and eight (8) copies of the Motion To Withdraw As Counsel and Motion To Suspend Procedural Schedule/Motion For Expedited Treatment in the above-referenced matter.

If you have any questions or concerns, please do not hesitate to contact me. Thank you for seeing this filed.

Sincerely,



Craig S. Johnson

CSJ:sw

Enc.

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

**FILED**

NOV 04 2003

Missouri Public  
Service Commission

**In the Matter of the Application of )  
Missouri RSA No. 7 Limited Partnership )  
d/b/a Mid-Missouri Cellular )  
for Designation as a Telecommunications )  
Company Carrier Eligible for Federal Universal )  
Service Support pursuant to § 254 of the )  
Telecommunications Act of 1996. )**

**Case No. TO-2003-0531**

**MOTION TO SUSPEND PROCEDURAL SCHEDULE  
MOTION FOR EXPEDITED TREATMENT**

**COMES NOW** the Alma Communications Company d/b/a Alma Telephone Company ("Alma") by and through its counsel of record, Andereck, Evans, Milne, Peace & Johnson, L.L.C., and in support of its Motion to Suspend Procedural Schedule in the above-captioned matter, and for its Motion for Expedited Treatment of This Motion, states that:

1. On November 3, 2003, Counsel for Alma Telephone Company was requested by Applicant Mid-Missouri Cellular to cease its representation of Alma in this proceeding. A motion to withdraw as counsel is being filed simultaneously with this motion.

2. Counsel's representation of Alma in this proceeding has been a matter of public record, presumably known by Mid-Missouri Cellular, since February of 2002 in prior proceeding, TO-2003-0288, and since June of 2003 in this docket. It was presumably known by Mid-Missouri Cellular during the October 1, 2003 prehearing conference wherein the parties jointly developed a proposed procedural schedule.

3. Applicant's request for counsel for Alma to withdraw was received the next working day after Applicant filed its October 31 direct testimony pursuant to the

procedural schedule Ordered October 14, 2003. Alma's rebuttal testimony is currently scheduled to be filed by December 5, 2003. The timing of this request will work an extreme hardship on Alma. Alma will need a suspension of the procedural schedule of not less than 30 days in which to secure replacement counsel, educate them as to the issues and evidentiary matters, and present evidence in rebuttal to Applicant's direct testimony.

4. Alma does not wish to unduly delay this proceeding, but the timing of Mid-Missouri Cellular's withdrawal request comes at a most inopportune time. A suspension of the procedural schedule for at least 30 days is necessary.

5. For its Motion for Expedited Treatment, Alma repeats the statements set forth in paragraphs 1-4 above. Alma requests that the Commission act on this request by November 17, 2003, and direct the other parties in this case to file any response to this Motion not later than November 13, 2003. No harm will accrue to the Applicant by considering this on an expedited basis, as it is Applicant's actions which necessitate this request. No negative effect on any party's customers, or to the general public, will occur if the Commission acts by November 17, 2003. This pleading was filed as soon as it could have been filed in view of the nature of Applicant's request for withdrawal.

WHEREFORE, Alma Telephone Company respectfully requests the Commission suspend the procedural schedule in this proceeding for 30 days, and for a new procedural schedule to be Ordered, in order to allow Alma sufficient time to secure counsel and prepare and proceed in this matter.

**ANDERECK, EVANS, MILNE,  
PEACE & JOHNSON, L.L.C.**

By 

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**ATTORNEYS FOR ALMA  
TELEPHONE COMPANY**

CERTIFICATE OF SERVICE

The undersigned does hereby certify that a true and accurate copy of the foregoing was mailed, U.S. Mail, postage pre-paid, this 4<sup>th</sup> day of November, 2003, to:

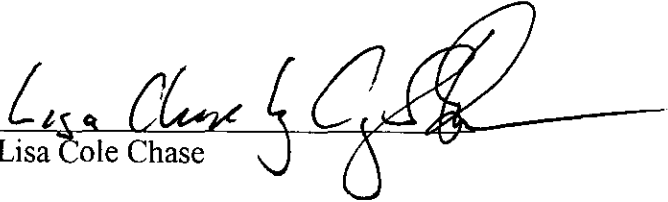
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