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Attorneys for Beehive Telephone Company, Inc.

BEFORE THE UTAH PUBLIC SERVICE COMMISSION

In the Matter of the Petition of)
All American Telephone Co., Inc.,)
for a *Nunc Pro Tunc* Amendment)
of Its Certificate of Authority to) Dkt. No. 08-2469-01
Operate as a Competitive Local)
Exchange Carrier within the)
State of Utah.)
)
)

BEEHIVE’S REQUEST FOR ADDITIONAL TIME TO REPLY

Beehive Telephone Company, Inc. (“Beehive”), asks the Utah Public Service Commission (“UPSC” or “Commission”) to enter an order allowing Beehive additional time within which to reply to the responses of the Utah Division of Public Utilities (“UDPU”), the Utah Committee of Consumer Services (“UCSS”), the Utah Rural Telephone Association (“URTA”), Qwest Corporation, and Qwest Communications

Company, LLC (“Qwest”), to the motions of Beehive for summary disposition and to strike pleadings in this docket, and, for cause, shows the Commission as follows.

On or about April 7, 2009, Beehive made a motion for summary disposition in this docket. Beehive also moved to strike certain pleadings previously filed by the UCSS in this docket.

On April 22, 2009, other parties in interest, including the UDPU, the UCSS, URTA, and Qwest responded to Beehive’s motions.

Pursuant to UPSC Rules R746-100-4.D. and E., the 10 day deadline for replying to these responses is today, May 4, 2009.

Because the responses from opposing parties were submitted April 22, the 10 days allotted for reply covered two intervening weekends, leaving Beehive only 7 business days to prepare a reply. Beehive must reply, moreover, to four opposition briefs. Finally, Beehive is represented in this docket by two solo practitioners who, for the period in question, have been pressed to complete other business for other clients. They have not been able to complete their reply in this matter within the time allowed under the Commission’s rules.

Accordingly, Beehive asks the Commission for leave to file a reply, as noted above, within 11 days from today’s date, or, in other words, Wednesday, May 15, 2009.

Dated this 4th day of May, 2009.

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CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing pleading, Beehive's Request for Additional Time to Reply, was served this 4th day of May, 2009, by e-mailing a copy of the same to all parties who have entered an appearance electronically in this docket.
