

David R. Irvine (1621)  
Attorney at Law  
747 East South Temple, Suite 130  
Salt Lake City, UT 84102  
Telephone: (801) 579-0800  
Facsimile: (801) 579-0801

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

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In the Matter of the Petition of TAG	)	Docket No. 15-2578-01
Mobile, LLC for Designation as an	)	
Eligible Telecommunications Carrier	)	JOINT MOTION TO MODIFY CASE
For the Purpose of Offering Lifeline	)	SCHEDULE
Service on a Wireless Basis.	)	
	)	
	)	

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The undersigned parties in this matter, by and through their counsel, hereby jointly move that the Commission's Scheduling Order, issued April 29, 2015, be modified as set forth below, for the reasons which follow.

On July 14, 2015, intervenor David Irvine filed his First Set of Data Requests to Petitioner TAG Mobile, which consisted of 53 items. The 14-day turn-around time for responding would require Petitioner to file responses not later than July 28, 2015. The Scheduling Order establishes July 29, 2015 as the date upon which direct testimony from parties other than the company is due.

That period may be insufficient for the company to determine how it wishes to proceed with respect to the data requests, and in the event that responses were filed on July 28th, that would leave the intervenor and other parties with insufficient time to make any meaningful use of the responses in preparing direct testimony.

The parties therefore request that the Order be modified to allow Petitioner until August 15, 2015 to respond to the intervenor's data requests, including the filing of any objections thereto or a request for a protective order or proceeding, in lieu of a protective order, pursuant to R 746-100-16. Further, at a time convenient for the Commission, at least 7 days thereafter, that a scheduling conference be convened, in which a new order of event deadlines shall be established, including timelines for dealing with objections to discovery, if any.

DATED this 22d day of July, 2015.

/s/ \_\_\_\_\_  
David J. Shaw  
Attorney for Petitioner TAG Mobile

/s/ \_\_\_\_\_  
David R. Irvine  
Intervenor

/s/ \_\_\_\_\_  
Justin C. Jetter  
Assistant Attorney General  
Division of Public Utilities

/s/ \_\_\_\_\_  
Rex W. Olsen  
Assistant Attorney General  
Office of Consumer Services