

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

**FORMAL COMPLAINT OF RONALD)
MOORE AGAINST CENTURYLINK)**

Docket No. 24-049-04

**RONALD MOORE'S REQUEST FOR 30 DAY EXTENSION
TO SECURE LEGAL REPRESENTATION**

Ronald Moore, appearing through his advisor, Robert Keiter, requests a 30-day extension to enable him to secure legal representation in this matter. This request is based on the fact that settlement discussions were initiated on July 29, 2024, with CenturyLink through its counsel and are ongoing at this time. Given the legal nature of these proceedings and his service-related disabilities, Mr. Moore is not in a position to effectively represent himself in this matter.

If the settlement discussions fail, Mr. Moore, a fully disabled and decorated veteran who is not conversant with legal proceedings, intends to seek legal representation through the Veterans Administration Legal Clinic in Salt Lake City, which will be open on August 8, 2024. It is Mr. Moore's intention to contest the factual statements and defenses made by CenturyLink in its Motion to Dismiss, including the statement that Mr. Moore never alerted or contacted CenturyLink to advise them that his phone line failed again on January 2, 2022 and needed further repair, following its supposed repair by CenturyLink.

For these reasons, Mr. Moore requests a thirty-day extension in order to proceed with settlement discussions and to seek legal representation if necessary. He also requests that the Commission hold CenturyLink's Motion to Dismiss in abeyance during this period.

Dated: July 30, 2024

Respectfully submitted,

_____/s/_____
Ronald Moore



Advisor to Ronald Moore (for the purpose of requesting an extension in this matter)
Professor of Law (for identification only; not a member of the Utah State Bar)
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CERTIFICATE OF SERVICE

I HEEBY CERTIFY that a true and correct copy of the foregoing **RONALD MOORE’S REQUEST FOR 30 DAY EXTENSION TO SECURE LEGAL REPRESENTATION** was sent to the following parties on the date indicated below.

CenturyLink **Via Email**

Katie N. Wagnerkatie.wagner@lumen.com

Utah Attorney General **Via Email**

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Patrick Grecu.....pgrecu@agutah.gov
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Utah Division of Public Utilities **Via Email**


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Dated: July 30, 2024

ON BEHALF OF RONALD MOORE

By: 
Robert B. Keiter