

STATE OF NEW HAMPSHIRE
BEFORE THE
PUBLIC UTILITIES COMMISSION

DT 07-011

Verizon New England, et al, and FairPoint Communications, Inc.

MOTION FOR EXTENSION OF TIME TO FILE RESPONSES TO
FAIRPOINT'S and segTEL's DATA REQUESTS

NOW COMES the Town of Hanover, by and through its attorneys, DONAHUE, TUCKER & CIANDELLA, PLLC ("DTC"), and moves the Commission to grant the Town of Hanover this Motion for Extension of Time to File Responses to FairPoint's and segTEL's Data Requests submitted on August 10, 2007.

1. According to the Public Utilities Commission procedural schedule, responses to FairPoint's and segTEL's data requests are due from the Town of Hanover on August 28, 2007.

2. The Town of Hanover has advised DTC that the Town Manager, Julia Griffin, the witness providing the testimony and the response to the data requests, left for a long-scheduled vacation on August 8, 2007, before the data requests were served, and will be returning to the Town of Hanover on August 27, 28 or 29, 2007, making preparation of her response

impossible by the deadline. Therefore, the Town requests a two week extension of time to file its responses.

3. At the time that the Commission staff proposed the revised procedural schedule that was adopted by the Commission, DTC communicated with Attorney Fabrizio that, due to long-planned absences by Ms. Griffin, the Town of Hanover might not be able to respond to the data requests propounded on it by the deadline, but that DTC could not say before the data requests, if any, were propounded.

4. Counsel for FairPoint was notified and cannot assent to this two week extension of time for the Town of Hanover to file its responses.

5. Counsel for segTEL was notified and does assent to this extension.

WHEREFORE, due to the impossibility of filing the responses by the deadline, the Town of Hanover prays that this Commission Order an extension of time of two weeks for the Town of Hanover to file its responses to FairPoint's and segTel's Data Requests.

Respectfully submitted,

THE TOWN OF HANOVER

By his attorneys:

DONAHUE, TUCKER & CIANDELLA, PLLC

Date: Aug 24, 2007

By: K B Miller

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CERTIFICATION

I hereby certify that a copy of the foregoing Motion has this 24th day of August, 2007 been forwarded to the service list.

K B Miller
Katherine B. Miller, Esq.

DT 07-011
Verizon Transfer of Assets and Sale to FairPoint
E-mail List

Last update: 8/1/2007 10:26 AM

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