

1 BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON

2 DR 26/UC 600

3 NORTHWEST PUBLIC COMMUNICATIONS
4 COUNCIL, formerly known as THE
5 NORTHWEST PAYPHONE ASSOCIATION,

6 Complainant,

7 v.

8 QWEST CORPORATION

9 Defendant.

QWEST CORPORATION'S
MOTION FOR EXTENSION TO
REPLY IN SUPPORT OF CROSS-
MOTION FOR SUMMARY
JUDGMENT

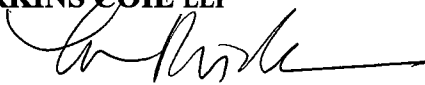
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11 On January 25, 2005, Complainant Northwest Public Communications Council
12 ("NPCC") filed its reply to Qwest's response to NPCC's motion for partial summary judgment
13 and its response to Qwest's cross-motion for summary judgment. Pursuant to OAR 860-013-
14 0035 (assuming that rule applies), Qwest's reply in support of its motion for summary judgment
15 is due by February 9, 2005. Qwest respectfully moves for a seven-day extension of time through
16 February 16, 2005, in which to serve and file its reply in support of this motion. Qwest has
17 conferred with plaintiff's counsel, who does not object to this request.

18 DATED: February 3, 2005.

19 Respectfully submitted,

20 PERKINS COIE LLP

21 By


Lawrence Reichman, OSB No. 86083
John P. Nusbaum, OSB No. 96378

22
23 **Qwest Corporation**

24 Alex M. Duarte, OSB No. 02045
25 421 SW Oak Street, Room 810
26 Portland, OR 97204

Attorneys for Defendant Qwest Corporation
Perkins Coie LLP

1 **CERTIFICATE OF SERVICE**

2 I hereby certify that I served the foregoing QWEST CORPORATION'S MOTION FOR
3 EXTENSION TO RESPOND TO MOTION FOR SUMMARY JUDGMENT on:

4 Brooks E. Harlow
5 David L. Rice
6 Miller Nash LLP
7 601 Union St Ste 4400
8 Seattle Wa 98101-2352
9 brooks.harlow@millernash.com

Jason Jones
State of Oregon Department of Justice
1162 Court Street, N.E.
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8 Alex Duarte
9 Qwest Corporation
10 421 SW Oak Street, Room 810
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12 aduarte@qwest.com

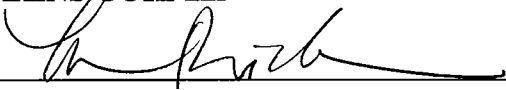
11 by causing a full, true, and correct copy thereof, addressed to the last-known office address of the
12 attorney, to be sent by the following indicated method or methods, on the date set forth below:
13

14 by **mailing** in a sealed, first-class postage-prepaid envelope and deposited
15 with the United States Postal Service at Portland, Oregon.

16 by **emailing** to the attorney at the email shown above, which is the last-
17 known email for the attorney's office (as indicated above)

18
19 DATED: February 3, 2005.

20 **PERKINS COIE LLP**

21 By 
22 Lawrence Reichman, OSB No. 86083
23 John P. Nusbaum, OSB No. 96378

24 Attorneys for Intervenor-Defendant Qwest Corporation