

**FRANK G. PATRICK & ASSOCIATES**  
**CORPORATE LAWYERS P.C.**

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*Attorneys At Law*

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December 15, 2009

Public Utility Commission of Oregon

Attn: Filing Center

550 Capitol St. NE, Ste. 215

PO Box 2148

Salem, OR 97308-2148

To: Hon. Allan Arlow

Public Utility Commission of Oregon

**RE: NORTHWEST PUBLIC COMMUNICATIONS COUNCIL V. QWEST CORP.**  
**Docket DR 26/JC600**  
**Unopposed Motion to Enlarge Time to File Reply to Qwest Motions**

Dear Judge Arlow,

Please find enclosed a motion, requesting an enlargement of time to file a response to Qwest's recent filings. You had established December 15 as Complainants response due date. Unfortunately I have been out of my office due to illness from the 8<sup>th</sup>. I dicussed this motion with Mr. Reichman and he has indicated that Qwest has no opposition to the motion for the enlargement of time.

If you would like to have a conference call in regard to that please advise.

Sincerely,

  
/s/

Frank G. Patrick  
Attorney at Law

Cc: Lawrence Reichman (email; US Mail) [reicl@perkinscoie.com](mailto:reicl@perkinscoie.com)

Jason W. Jones (email; US Mail) [Jason.w.jones@state.or.us](mailto:Jason.w.jones@state.or.us)

Alex M. Duarte (email; US Mail) [alex.duarte@qwest.com](mailto:alex.duarte@qwest.com)

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2  
3 BEFORE THE PUBLIC UTILITY COMMISSION  
4 OF OREGON  
5

6 THE NORTHWEST PUBLIC  
7 COMMUNICATIONS COUNCIL, on behalf of  
8 PSPs A to Z, and NPCC MEMBERS: Central  
9 Telephone, Inc; Communication  
10 Management Services, LLC; Davel  
11 Communications a/k/a Phonetel  
12 Technologies, Inc., Interwest Tel, LLC;  
13 Interwest Telecom Services Corporation;  
14 NSC Communications Public Services  
15 Corporation; National Payphone Services,  
16 LLC; Pacific Northwest Payphones; Partners  
17 in Communication; T & C Management,  
18 LLC; Corban Technologies, Inc.; and Valley  
19 Pay Phones, Inc.

20 Complainants,  
21 v.

22 Qwest Corporation,

23 Respondent.  
24  
25  
26

DOCKET NO. DR 26/UC 600

UNOPPOSED MOTION FOR ENLARGEMENT  
OF TIME TO FILE REPLY

27 TO: Oregon Public Utility Commission

28 AND TO: All Parties

29 The Complainants, by counsel, Frank G. Patrick hereby moves the Commission for  
30 an Order enlarging the time to file a Reply to Qwest's Motion(s) to Strike the First and  
31 Second Amended Complaints, from the current due date of December 15, 2009 to  
32 December 22, 2009. Movant has explained the basis of the request, the fact of his illness  
33 from early in the day of December 8, with Lawrence Reichman on December 14th,  
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1 counsel for Qwest Corp., who has authorized me to represent that Qwest does not oppose  
2 this motion.

3 DATED this \_\_\_15th\_\_\_ day of December 2009.



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FRANK G. PATRICK, OSB 76022  
Attorney for Plaintiff

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CERTIFICATE OF SERVICE

I, the undersigned below, hereby certify that I served the foregoing UNOPPOSED MOTION FOR ENLARGEMENT OF TIME TO FILE a REPLY For COMPLAINANTS on:

Lawrence Reichman  
Perkins Coie  
1120 N.W. Couch Street, 10<sup>th</sup> Floor  
Portland, Oregon 97209-4128  
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Jason W. Jones  
Department of Justice  
1162 Court Street NE  
Salem, Oregon 97301  
[Jason.w.jones@state.or.us](mailto:Jason.w.jones@state.or.us)

Alex M. Duarte  
Qwest Corporation  
421 SW Oak St., Suite 810  
Portland, Oregon 97204  
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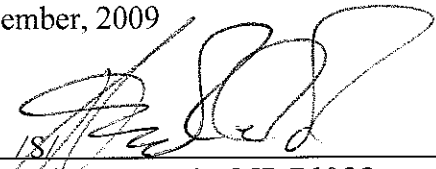
by the following indicated method or methods:

by **mailing** a full, true, and correct copy thereof in a sealed, first-class postage-prepaid envelope, addressed to the attorney as shown above, the last-known office address of the attorney, and deposited with the United States Postal Service at Seattle, Washington, and by electronic mail on the date set forth below.

by sending full, true and correct copies thereof via **overnight courier** in sealed, prepaid envelopes, addressed to the attorneys as shown above, the last-known office addresses of the attorneys, on the date set forth below.

And Certify that I did electronically file same with the PUC Filing Center, with a hard copy to PUC, Filing Center, 550 Capitol Street NE, Ste 215, PO Box 2148, Salem, OR 97308-2148.

DATED this 15th day of December, 2009

  
\_\_\_\_\_  
Frank G. Patrick, OSB 76022