

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

Attorneys At Law

P.O. Box 231119

Address for Messenger: 11040 SW Barbur Blvd.

Portland, OR 97281

Phone: 503-245-2828 Fax: 503-245-1448

October 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/UC600
Unopposed Motion to Enlarge Time to File Amended Complaint

Dear Judge Arlow,

Please find enclosed a motion, requesting an enlargement of time to file the Amended Complaint in this proceeding. Mr. Reichman and I have discussed the matter 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

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

Alex M. Duarte (email; US Mail) alex.duarte@qwest.com

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3 BEFORE THE PUBLIC UTILITY COMMISSION
4 OF OREGON
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8 The Northwest Public Communications
9 Council,

10 Complainant,

11 v.

12 Qwest Corporation,

13 Respondent.

DOCKET NO. DR 26/UC 600

UNOPPOSED MOTION FOR ENLARGEMENT
OF TIME TO FILE AN AMENDED
COMPLAINT

14 TO: Oregon Public Utility Commission

15 AND TO: All Parties

16 The Complainant, by counsel, Frank G. Patrick hereby moves the Commission for
17 an Order enlarging the time to file an Amended Complaint, as previously allowed, from
18 October 16, 2009 to November 16, 2009. Lawrence Reichman, counsel for Qwest Corp.
19 has authorized me to represent that Qwest does not oppose this motion.

20 DATED this ___16th___ day of October 15, 2009.

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23 FRANK G. PATRICK, OSB 76022
24 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 AN AMENDED COMPLAINT For The Northwest Public Communications Council on:

Lawrence Reichman
Perkins Coie
1120 N.W. Couch Street, 10th Floor
Portland, Oregon 97209-4128
reicl@perkinscoie.com

Jason W. Jones
Department of Justice
1162 Court Street NE
Salem, Oregon 97301
jason.w.jones@state.or.us

Alex M. Duarte
Qwest Corporation
421 SW Oak St., Suite 810
Portland, Oregon 97204
alex.duarte@qwest.com

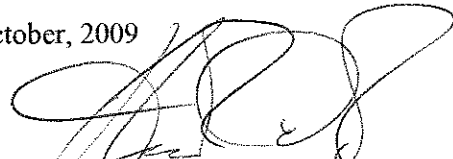
by the following indicated method or methods:

 X 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 16th day of October, 2009



Frank G. Patrick, OSB 76022

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3 BEFORE THE PUBLIC UTILITY COMMISSION
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7 The Northwest Public Communications
8 Council,

9 Complainant,

10 v.

11 Qwest Corporation,

12 Respondent.

DOCKET NO. DR 26/UC 600

DECLARATION IN SUPPORT OF
UNOPPOSED MOTION FOR ENLARGEMENT
OF TIME TO FILE AN AMENDED
COMPLAINT

13 The undersigned, Frank G. Patrick does submit this Declaration in Support of the Motion
14 to Enlarge Time to file an Amended Complaint.

15 1. I am the new counsel for the Complainants, including the NPCC and the 13 claimants
16 added by the Commission's order of May 4, 2009.

17 2. I have discussed this motion with Lawrence Reichman, who has authorized me to
18 represent that Qwest does not oppose the motion.

19 3. I communicated with Jason Jones, of the Department of Justice, it does not oppose the
20 motion.

21 "I hereby declare that the above statement is true to the best of my knowledge and
22 belief, and that I understand it is made for use as evidence in court and is subject to
23 penalty for perjury."

24 DATED this October 16, 2009.

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26 FRANK G. PATRICK, OSB 76022
Attorney for Complainant