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4 **BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON**
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6 CHARTER COMMUNICATIONS
7 HOLDING COMPANY, LLC,; FALCON
8 TELECABLE, L.P., FALCON CABLE
9 SYSTEMS COMPANY II, L.P., AND
FALCON COMMUNITY VENTURES I,
L.P.

10 Complainants,

11 v.

12 CENTRAL LINCOLN PEOPLE'S UTILITY
13 DISTRICT,

14 Defendant.

Case No. UM-1241

**COMPLAINANTS' UNOPPOSED
MOTION FOR EXTENSION OF TIME**

15 Charter Communications Holding Company, LLC, on its own behalf and on behalf of its
16 subsidiaries, Falcon Telecable, L.P., Falcon Cable Systems Company II, L.P., and Falcon
17 Community Ventures I, L.P. (jointly "Charter"), hereby submit this Motion seeking an extension
18 of time from March 13, 2006 to March 16, 2006 within which to file its opposition to Central
19 Lincoln People's Utility District's ("CLPUD") ORCP 21 Motion and its Cross Motion for
20 Summary Judgment. Counsel for CLPUD has agreed to the relief requested in this motion. In
21 support of this motion, Charter states as follows:
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23 1. Pursuant to the Commission's Memorandum dated February 21, 2006, CLPUD's
24 ORCP 21 Motion was due on Friday February 24, 2006. Counsel for Charter did not receive
25 CLPUD's ORCP 21 Motion, however, until Monday February 27, 2006 by mail, and then by e-
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1 mail on Tuesday February 28, 2006. Moreover, there appears to be some confusion as to the
2 actual filing date of CLPUD's ORCP 21 Motion. Accordingly, on February 28, 2006, counsel
3 for Charter contacted counsel for CLPUD, who agreed to allow Charter an additional three days
4 – from March 13, 2006 to March 16, 2006 – to file its Opposition and Cross Motion. In addition,
5 counsel for CLPUD and counsel for Charter have mutually agreed that this extension will not
6 affect the remainder of the schedule set forth in the Commission's Memorandum dated February
7 21, 2006, including the date for CLPUD's response to Charter's Cross Motion.

9 2. Good cause exists for granting this request. This brief extension of time will
10 enable Charter to submit a full and accurate filing, so that the Commission can proceed with an
11 appropriate record before it. No party will be prejudiced by the grant of this request, as CLPUD
12 has agreed to the modification of the schedule.

14 3. Accordingly, Charter respectfully requests that the Commission grant this Motion
15 and allow Charter until March 16, 2006 to file its Response to CLPUD's ORCP 21 Motion and
16 its Cross Motion for Summary Judgment.

18 DATED this 1st day of March, 2006.

20 MILLER NASH LLP

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22 Brooks E. Harlow
23 OSB No. 03042

24 Attorneys for Complainants
25 Charter Communications Holding
26 Company, LLC, Falcon Telecable, L.P.,
Falcon Cable Systems Company II, L.P.,
And Falcon Community Ventures I, L.P.

COLE, RAYWID & BRAVERMAN, LLP

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BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON

CHARTER COMMUNICATIONS
HOLDING COMPANY, LLC, FALCON
TELECABLE, L.P., FALCON CABLE
SYSTEMS COMPANY II, L.P., AND
FALCON COMMUNITY VENTURES I,
L.P.

Case No. UM 1241

Complainants,

v.

CENTRAL LINCOLN PEOPLE'S UTILITY
DISTRICT,

Defendant.

CERTIFICATE OF SERVICE

I hereby certify that true and correct copies of the following pleadings

- Complainants' Unopposed Motion For Extension Of Time.

were served this day via e-mail transmission, and by U.S. Mail in sealed envelopes upon the following:

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18 Dated this 1st day of March, 2006, at Washington, D.C.

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Carol Munnerlyn, Secretary