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

August 14, 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
Stipulation to Enlargement of 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 a 30 day enlargement of time.

If you would like to have a conference call in regard to that please advise. If the motion is not in appropriate form or you desire that I prepare an in order please have your staff 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@gwest.com

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3	BEFORE THE PUBLIC UTILITY COMMISSION		
4	OF OREGON		
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7	TO: Oregon Public Utility Commission		
8	The Northwest Public Communications Council, DOCKET NO. DR 26/UC 600		
9 10	Complainants, UNOPPOSED MOTION FOR ENLARGEMENT		
11	v. OF TIME TO FILE AN AMENDED COMPLAINT		
12	Qwest Corporation,		
13	Respondent.		
14	AND TO: All Parties		
15	The Complainants, The Northwest Public Communications Council, by counsel,		
16	Frank G. Patrick hereby moves the Commission for an Order enlarging the time to file an		
	Amended Complaint, as allowed by the Commission, from August 17, 2009 to September		
17	16, 2009. Upon conferring with Lawrence Reichman, counsel for Qwest Corporation, he		
18	has indicated that Qwest does not oppose this motion. At the time of filing I had not yet		
19 20	heard from Jason Jones, DOJ. (See Declaration of Frank G. Patrick attached.)		
21	DATED this August 14, 2009.		
22			
23	/s/ FRANK G. PATRICK, OSB 76022		
24	Attorney for Plaintiff		
25			
26			

Page 1 UNOPPOSED MOTION TO ENLARGE TIME

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2	CERTIFICATE OF SERVICE		
3	I, the undersigned below, hereby certify that I served the foregoing UNOPPOSED MOTION		
4	FOR ENLARGEMENT OF TIME TO FILE AN AMENDED COMPLAINT and DECLARATION OF FRANK G. PATRICK, For The Northwest Public Communications Council on:		
5	Lawrence Reichman		
6	Perkins Coie 1120 N.W. Couch Street, 10 th Floor		
7	Portland, Oregon 97209-4128 reicl@perkinscoie.com		
8	Jason W. Jones		
9	Department of Justice 1162 Court Street NE		
10	Salem, Oregon 97301 Jason.w.jones@state.or.us		
11	Alex M. Duarte		
12	Qwest Corporation 421 SW Oak St., Suite 810		
13	Portland, Oregon 97204 <u>alex.duarte@qwest.com</u>		
14	by the following indicated method or methods:		
15			
16	Xby 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		
17 18	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.		
19	by sending full, true and correct copies thereof via overnight courier in		
20	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.		
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23	DATED this AUGUST 14, 2009		
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25	/s/ Frank G. Patrick, OSB 76022		
26	Frank G. Fatrick, OSD 10022		

Page 2 UNOPPOSED MOTION TO ENLARGE TIME

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3	BEFORE THE PUBLIC UTILITY COMMISSION			
4	OF OREGON			
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8	The Northwest Public Communications Council,	DOCKET NO. DR 26/UC 600		
9 10	Complainant,	DECLARATION IN SUPPORT OF UNOPPOSED MOTION FOR ENLARGEMENT OF TIME TO FILE AN AMENDED		
11	V.	COMPLAINT		
12	Qwest Corporation,			
13	Respondent.			
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18				
19	The undersigned, Frank G. Patrick does submit this Declaration in Support of the			
20	Motion to Enlarge Time to file an Amended Complaint.			
21	1. I am the new counsel for the Complainan	its, including the NPCC and the 13 claimants		
22	added by the Commission's order of May 4, 2009.			
23	2. As is often the case of new counsel, issues arise that require some additional review as			
24	is the case here requiring additional time to properly file with the Commission.			
25	3. I have discussed this motion with Lawrence Reichman, who has asked that I report			
26	that the Respondent does not oppose the motion.			

1	1 4. I called Jason Jones, of the Department of Justice,	4. I called Jason Jones, of the Department of Justice, but he has not returned the call. I		
2	2 do not anticipate he will have an objection, based on	the last motion.		
3	3			
4	Thereby declare that the above statement is true to t			
5	belief, and that I understand it is made for use as evic penalty for perjury."	lence in court and is subject to		
6	6 DATED this August 14, 2009.			
7	/8/			
8	FRANK G. PA Attorney for C	ATRICK, OSB 76022 omplainant		
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