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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@qwest.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
9 Council,

10 Complainants,

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 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
17 Amended Complaint, as allowed by the Commission, from August 17, 2009 to September
18 16, 2009. Upon conferring with Lawrence Reichman, counsel for Qwest Corporation, he
19 has indicated that Qwest does not oppose this motion. At the time of filing I had not yet
20 heard from Jason Jones, DOJ. (See Declaration of Frank G. Patrick attached.)

21 DATED this August 14, 2009.

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23 /s/

24 FRANK G. PATRICK, OSB 76022
25 Attorney for Plaintiff
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BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON

The Northwest Public Communications
Council,

Complainant,

v.

Qwest Corporation,

Respondent.

DOCKET NO. DR 26/UC 600

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

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

1. I am the new counsel for the Complainants, including the NPCC and the 13 claimants added by the Commission’s order of May 4, 2009.
2. As is often the case of new counsel, issues arise that require some additional review as is the case here requiring additional time to properly file with the Commission.
3. I have discussed this motion with Lawrence Reichman, who has asked that I report that the Respondent does not oppose the motion.

1 4. I called Jason Jones, of the Department of Justice, but he has not returned the call. I
2 do not anticipate he will have an objection, based on the last motion.

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

6 DATED this August 14, 2009.

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/S/

FRANK G. PATRICK, OSB 76022
Attorney for Complainant

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