2	•	•
3		
4		
5		
6		
7	BEFORE THE PUBLIC UTILITY COMMISSION	
8	OF OREGON	
9	UM 1265	
10	AMERICAN CIVIL LIBERTIES UNION OF OREGON,	
11	Complainant,	AMERICAN CIVIL LIBERTIES UNION
12	v.	OF OREGON'S MOSTLY UNOPPOSED MOTION FOR EXTENSION OF TIME
13	VERIZON NORTHWEST, INC., UNITED TELEPHONE COMPANY OF THE	TO REFILE A PLEADING
14		
15	NORTHWEST, dba SPRINT, and QWEST CORPORATION,	
16	Defendants.	
17	۱ میں اور	
18	Pursuant to OAR 860-013-0031, the American Civil Liberties Union of	
19	Oregon ("ACLU") files this Mostly Unopposed Motion for Extension of Time to refile	
20	its pleading pursuant to the July 31, 2006 Ruling, from August 30, 2006 to	
21	September 22, 2006.	
22	The ACLU requests this extension because the attorneys for the ACLU, Keith	
23	Dubanevich and Mark Friedman, will both be out of town on vacation and to	
24	attend a conference for two weeks. In addition, the ACLU intends to explore	
25	alternatives to formal proceedings before the PUC and additional time is necessary	
26	to complete the research and investigation necessary for the ACLU to file a new	

Page 1 - AMERICAN CIVIL LIBERTIES UNION OF OREGON'S MOSTLY UNOPPOSED MOTION FOR EXTENSION OF TIME TO REFILE A PLEADING

1

GARVEY SCHUBERT BARER A PARTNERSHIP OF PROFESSIONAL CORPORATIONS eleventh floor 121 s.w. morrison street portland, oregon 97204-3141 (503) 228-3939 pleading as directed by the July 31, 2006 Ruling.

DATED this 18th day of August, 2006.

Granting an extension to the ACLU will not harm any party to this proceeding and is in the public interest. In addition, the ACLU has conferred with defendants Verizon Northwest Inc. and United Telephone Company of the Northwest, and they have no objection to this request. Counsel for the ACLU attempted to confer with counsel for Qwest Corporation by telephone on August 16, 2006 and by e-mail on August 17, 2006, but received no reply as of the date of this filing. The ACLU, therefore, requests that the deadline for the ACLU to refile a pleading be extended to September 22, 2006.

1

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

Respectfully submitted,

GARVEY SCHUBERT BARER Keith S. Dubanevich, OSB #97520

Keith S. Dubanevich, OSB #97520 E-Mail: kdubanevich@gsblaw.com Mark E. Friedman, OSB #73094 E-Mail: mfriedman@gsblaw.com Telephone: (503) 228-3939 Facsimile: (503) 226-0259

Attorneys for Complainant American Civil Liberties Union of Oregon

Page 2 - AMERICAN CIVIL LIBERTIES UNION OF OREGON'S MOSTLY UNOPPOSED MOTION FOR EXTENSION OF TIME TO REFILE A PLEADING

GARVEY SCHUBERT BARER A PARTNERSHIP OF PROFESSIONAL CORPORATIONS eleventh floor 121 s.w. morrison street portland, oregon 97204-3141 (503) 228-3939

CERTIFICATE OF SERVICE

2 I hereby certify that the foregoing AMERICAN CIVIL LIBERTIES UNION OF 3 **OREGON'S MOSTLY UNOPPOSED MOTION FOR EXTENSION OF TIME TO** 4 **REFILE A PLEADING** was served on: 5 Alex M. Duarte William E. Hendricks 6 Sprint/United Telephone Co. of the Corporate Counsel Qwest Corporation Northwest 7 421 SW Oak Street, Ste. 810 902 Wasco Street, A0412 Portland, OR 97204 Hood River, OR 97031 8 E-Mail: alex.duarte@gwest.com E-Mail: tre.e.hendricks.iii@sprint.com 9 **Renee Willer** Gregory Romano General Counsel Manager Regulatory & 10 Verizon Corporate Services **Government Affairs** Verizon Corporate Services MC WA0105RA 11 MC: OR030156 1800 41st Street 20575 NW Von Neumann Dr., Ste 150 12Everett, WA 98201 Hillsboro, OR 97006-4771 E-mail: Gregory.m.romano@verizon.com E-mail: renee.willer@verizon.com 13 Citizens' Utility Board of Oregon Jason Eisdorfer 14 OPUC Dockets Energy Program Director Citizens' Utility Board of Oregon 15 610 SW Broadway, Ste. 308 Portland, OR 97205 610 SW Broadway, Ste. 308 E-Mail: dockets@oregoncub.org Portland, OR 97205 16 E-Mail: Jason@oregoncub.org 17 18 by mailing to them a copy of the original thereof, contained in sealed envelopes, 19 addressed as above set forth, with postage prepaid, and deposited in the mail in 20 Portland, Oregon, on August 18, 2006 21 22Keith S. Dubanevich 23 Of Attorneys for Complainant 24 PDX DOCS:377814.1 [30186-00114] 25 26 CERTIFICATE OF SERVICE Page 1 -GARVEY SCHUBERT BARER A PARTNERSHIP OF PROFESSIONAL CORPORATIONS eleventh floor 121 s.w. morrison street portland, oregon 97204-3141 (503) 228-3939

1