

RECEIVED

JUN 10 2014

PUBLIC SERVICE
COMMISSION

IN THE PUBLIC SERVICE COMMISSION OF
THE COMMONWEALTH OF KENTUCKY

CASE NO. 2013-00427
NEW CINGULAR WIRELESS
CELL TOWER
HINDMAN

MOTION AND AFFIDAVIT FOR EXTENSION OF TIME TO FILE LATE REPLY

Comes the Intervenor, East Kentucky Network, LLC d/b/a Appalachian Wireless (“EKN”), by counsel, and moves the honorable PSC for an order granting an extension of time within which to file its Reply to the Response and Objection of the Applicant filed herein on June 4, 2014 and received in counsel’s office on that date. As grounds counsel states that on the following day he received an email message from the regulatory compliance director with whom he normally works on the within matter that she was out of the office with limited availability from June 5, 2014 until Monday, June 9, 2014. On Sunday, June 9, 2014 counsel was required to drive from Prestonsburg, Floyd County, Kentucky via Lexington to Franklin, Simpson County, KY in order to attend a scheduled court appearance in Simpson Circuit Court on Monday, June 10, 2014 in a criminal matter for a family member who he does not represent in the case (counsel does not practice criminal law but nonetheless had to “stand up for” the client and did so). Counsel did not arrive back in Lexington until the evening of June 10, 2014 and has still not had the first opportunity to review this matter with the client and prepare a proper reply.

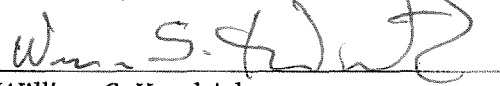
As a result of the foregoing, counsel neglected to timely file a motion for extension of time within the required five (5) day period as provided in the regulations concerning

practice before the PSC, and is required to seek the additional time to file the Reply of the client.

As counsel will not be able to return to his office today by reason of the hand delivery of this Motion to PSC offices in Frankfort, KY, we believe it appropriate that the period within which to file a Reply upon behalf of the Intervenor be extended to and include June 18, 2014.

WHEREFORE the proper Orders of the honorable Commission are demanded.

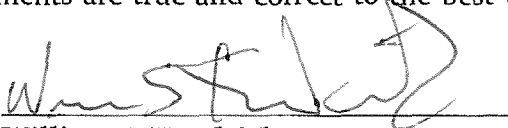
FRANCIS, KENDRICK & FRANCIS



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Prestonsburg, Kentucky 41653
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VERIFICATION

This is to verify that the foregoing statements are true and correct to the best of my knowledge and belief.



William S. Kendrick

**STATE OF KENTUCKY
COUNTY OF FLOYD**

Subscribed and sworn to before me, a Notary Public, this 10th day of June, 2014.



NOTARY PUBLIC
Commissioner Expires: 7-6-2017


CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the foregoing has been served, by mail, upon the following, this 10th day of June, 2014:

Hon. David A. Pike
AT&T Mobility
1578 Highway 44 East
P.O. Box 369
Shepherdsville, KY 40165-0369

Hon. Jeff Deroven
Executive Director, PSC
211 Sower Blvd.
P.O. Box 615
Frankfort, Kentucky 40602

Hon. Richard G. Raff
Hon. Jeb Pinney
Division of General Counsel
Kentucky Public Service Commission
211 Sower Blvd.
P.O. Box 615
Frankfort, Kentucky 40602


William S. Kendrick