

JUN 26 2018

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION PUBLIC SERVICE  
COMMISSION

In the Matter of

CMN-RUS, Inc.

Complainant

v.

Windstream Kentucky East, LLC

Respondent

No. 2018-00157

**Motion for Informal Conference**

CMN-RUS, Inc. (“CMN”) hereby moves for a preliminary informal conference, to be held no later than July 13, 2018. In support of this motion, CMN states as follows:

1. CMN’s Complaint and the Answer of Windstream Kentucky East, LLC (“Windstream”) thereto have narrowed and focused the issues. CMN has served a First Set of Discovery Requests on Windstream, and Windstream has stated that it may propound initial discovery requests on CMN. Such initial discovery between the parties is likely to further narrow and focus the issues and may establish that there are no genuine disputes of fact about any material issue.

2. Holding an informal conference early in this case would expedite the proceedings and more efficiently use the resources of the Commission and the parties. Such a conference could identify issues subject to further discovery, the likely need for a hearing, and the most efficient timing and sequence of further discovery in these circumstances.

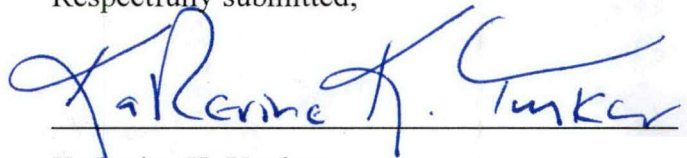
3. Windstream’s counsel has told the undersigned that his schedule is such that his availability for attending an informal conference over the next 2-3 months is limited to the period on or before Friday, July 13, 2018. Representatives of CMN will make arrangements to be

available at any scheduling conference scheduled on or before July 13, 2018 (excepting only the Fourth of July holiday). CMN suggests that the informal conference would not take more than two (2) hours, and could be held telephonically.

4. The advantages from the requested informal conference would be lost or greatly diminished if it is not scheduled before mid-July 2018. CMN's motion is only for an informal conference to be held sometime during the next 2.5 weeks.

WHEREFORE, CMN respectfully requests scheduling of an informal conference in this matter. to be held no later than Friday, July 13, 2018.

Respectfully submitted,



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*Attorney for CMN-RUS, Inc.*

#### CERTIFICATE OF SERVICE

I hereby certify that on the 26th day of June, 2018, a copy of the foregoing has been served on the attorneys for Respondent by email and first-class mail, postage prepaid, addressed to: Casey C. Stansbury <[estansbury@mrrlaw.com](mailto:estansbury@mrrlaw.com)>, Tia J. Combs <[tcombs@mrrlaw.com](mailto:tcombs@mrrlaw.com)>; MAZANEC, RASKIN & RYDER CO.; 230 Lexington Green Circle, Suite 605; Lexington, KY 40503.



Attorney for Complainant