COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION

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PUBLIC SERVICE COMMISSION

In the Matter of:

Express Telephone Services, Inc.

Case No. 2004-00433

V:50

NOTICE OF APPEARANCE AND MOTION FOR CONTINUANCE

Express Telephone Services, Inc. gives notice that it is represented by counsel, who has only recently been retained in this matter. Because counsel has not had adequate time to review the complaints against the company and because there is insufficient time to prepare a satisfactory response to the Commission's Order, the company requests that the hearing scheduled for January 11, 2005, be continued generally and that an informal conference be scheduled at a later date.

In order to provide an adequate response to the issues raised in the Order, the company requests that the conference be scheduled no sooner than ten business days from the filing of this Motion.

SUBMITTED BY:

John N. Hughes 124 W. Todd St. Frankfort, KY 40601

Attorney for Express Telephone Services, Inc.

I certify that a copy of this Motion was served on the Attorney General, 1024 Capital Center Dr., Frankfort, KY 40601 by first class mail the 7th day of January, 2005.

John N. Hughes