

**BEFORE THE PUBLIC SERVICE COMMISSION  
COMMONWEALTH OF KENTUCKY**

*In the Matter of:*

**THE APPLICATION OF NEW  
CINGULAR WIRELESS PCS, LLC,  
A DELAWARE LIMITED LIABILITY  
COMPANY, D/B/A AT&T MOBILITY  
AND UNITI TOWERS LLC, A  
DELAWARE LIMITED LIABILITY  
COMPANY FOR ISSUANCE OF A  
CERTIFICATE OF PUBLIC  
CONVENIENCE AND NECESSITY  
TO CONSTRUCT A WIRELESS  
COMMUNICATIONS FACILITY  
IN THE COMMONWEALTH OF  
KENTUCKY IN THE COUNTY OF  
PULASKI**

Case No. 2020-00351

**UNOPPOSED MOTION FOR EXTENSION OF TIME**

SBA Towers III LLC (“SBA”), by counsel, hereby files this unopposed motion for an extension of time through and including Friday, January 8, 2021 to file its Reply in Support of its Motion to Intervene. In support of this Motion, SBA states as follows.

1. SBA and its counsel did not receive electronic notice of AT&T Mobility and Uniti Towers LLC’s (the “Applicants”) Response being filed via the Commission’s website when it was filed on Monday, December 28, 2020.

2. As a result, SBA and its counsel did not receive notice that the Applicants had filed a Response to SBA’s Motion to Intervene until Thursday, December 31, 2020, when SBA’s counsel received a service copy of the Response via United States Mail.

3. Upon receipt, undersigned counsel began diligently reviewing the Response, but, due to the New Year’s Day holiday and numerous arguments contained within the Response,

undersigned counsel needs additional time to review and prepare a Reply in Support of SBA's Motion to Intervene.

4. Undersigned counsel has conferred with counsel for the Applicants and counsel for the Applicants has indicated that the Applicants have no objection to SBA being granted an extension of time through and including Friday, January 8, 2021 to file its Reply.

**WHEREFORE**, SBA Towers III LLC respectfully requests that the Commission grant its Motion for Extension of Time to File its Reply in Support of its Motion to Intervene through and including January 8, 2021.

This the 4th day of January, 2021.

Respectfully submitted,

/s/ Edward T. Depp  
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*Counsel to SBA Towers III LLC*

### **Certification**

I hereby certify that the electronic version of this filing made with the Commission on January 4, 2021, is a true and accurate copy of the paper document that will be submitted to the Commission within 30 days of the Governor lifting the state of the emergency pursuant to the Commission's Orders in Case No. 2020-00085, and the electronic version of the filing has been transmitted to the Commission. A copy of this filing has been served electronically on all parties of record for whom an email address is given in the online Service List for this proceeding, and there are currently no parties that the Commission has excused from participation by electronic means.

/s/ Edward T. Depp  
*Counsel to SBA Towers III LLC*