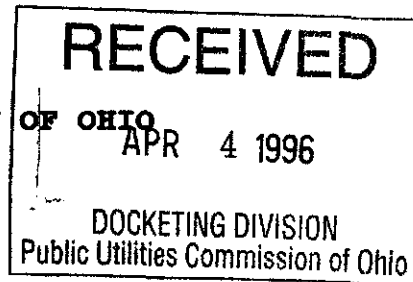


PC

BEFORE
THE PUBLIC UTILITIES COMMISSION



STATE ALARM, INC.
5956 Market Street
Youngstown, Ohio 44512

Complainant,

v.

Ameritech Ohio
a/k/a The Ohio Bell Company
45 Erieview Plaza
Cleveland, Ohio 44114,

Respondent.

Case No. 95-1182-TP-CSS

JOINT MOTION OF STATE ALARM, INC. AND
AMERITECH OHIO TO CONTINUE HEARING

Now comes Complainant State Alarm, Inc. (hereinafter, "State Alarm") and Respondent Ameritech Ohio ("Ameritech") before this Commission pursuant to O.A.C. 4901-1-12, and herein moves for a continuance of the hearing in this case which is scheduled for April 9, 1996.

Memorandum in Support

The parties appeared in this matter at a pre-hearing on March 5, 1996. After providing Attorney Examiner Jennings with the parties' positions in the case, counsel for State Alarm and Ameritech agreed that the issues involved in this case require an extensive discovery process of approximately 6-8 months in the absence of other complications in the case. Extensive discovery is needed to examine issues that deal with multiple services and a time frame that covers the period of approximately 1975 to the present.

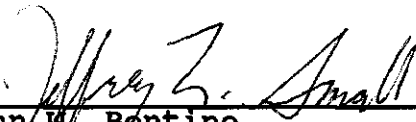
The expected period required for discovery of the facts

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concerning this case will extend well past the originally scheduled hearing date of April 9, 1996. The first of the expected depositions in the case is scheduled for April 8, 1996 and other discovery activities are on-going.

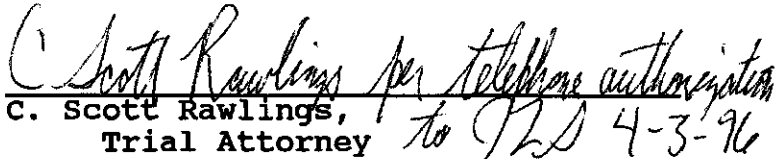
WHEREFORE, State Alarm and Ameritech jointly pray that the Commission continue the hearing that is set for April 9, 1996 to permit adequate discovery to take place in this case.

Respectfully submitted,



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