

**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Complaint of	)	
NorthEast Ohio Neighborhood Health	)	
Services, Inc.,	)	
	)	
Complainant,	)	
	)	
v.	)	Case No. 15-325-TP-CSS
	)	
Cavalier Telephone Corp. d/b/a Windstream	)	
Communications,	)	
	)	
Respondent.	)	

---

**JOINT MOTION FOR THIRD EXTENSION OF TIME TO PLEAD AND  
REQUEST FOR EXPEDITED RULING**

---

Pursuant to Ohio Adm. Code Sections 4901-1-12 and 4901-13, Complainant NorthEast Ohio Neighborhood Health Services, Inc. ("NEON") and Respondent Cavalier Telephone Corp. d/b/a Windstream Communication ("Windstream") respectfully move for a third extension of time until on or before August 31, 2015 for Windstream to file its memorandum contra to the Motion of NEON for Entry of Default Judgment and for Sanctions Due to Windstream's Failure to have a Corporate Representative Appear at the Settlement Conference filed in this matter on May 6, 2015. NEON and Windstream have jointly agreed to this additional extension to continue to focus their efforts on settlement negotiations, which constitutes good cause for the extension of time.

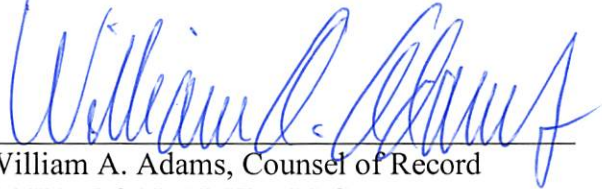
Pursuant to Ohio Adm. Code Section 4901-1-12(C), NEON and Windstream also respectfully request an expedited ruling on the Joint Motion for Second Extension since Windstream's response is currently due on or before July 31, 2015.

Respectfully submitted,

/s/ Matthew T. Fitzsimmons (per telephone authority)

Matthew T. Fitzsimmons, Counsel of Record  
NICOLA, GUDBRANSON & COOPER, LLC  
Republic Building, Suite 1400  
25 West Prospect Avenue  
Cleveland, OH 44115-1048  
(216) 621-7227 (telephone)  
(216) 621-3999 (fax)  
fitzsimmons@nicola.com  
*Attorneys for Complainant NorthEast Ohio  
Neighborhood Health Services, Inc.*

Respectfully submitted,



William A. Adams, Counsel of Record  
BAILEY CAVALIERI LLC  
10 West Broad Street, Suite 2100  
Columbus, OH 43215-3422  
(614) 229-3278 (telephone)  
(614) 221-0479 (fax)  
william.adams@baileycavalieri.com  
*Attorneys for Respondent Cavalier Telephone  
Corp. d/b/a Windstream Communications*

**This foregoing document was electronically filed with the Public Utilities**

**Commission of Ohio Docketing Information System on**

**7/22/2015 9:45:31 AM**

**in**

**Case No(s). 15-0325-TP-CSS**

Summary: Motion Joint Motion for Third Extension of Time to Plead and Request for Expedited Ruling electronically filed by Mr. William A. Adams on behalf of Cavalier Telephone Corp. d/b/a Windstream Communications