

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

Johnnie Graham Jr.,)	
)	
Complainant)	
)	
v.)	Case No. 17-2114-TP-CSS
)	
Frontier Communications, Inc.,)	
)	
Respondent.)	

**FRONTIER COMMUNICATIONS, INC.'S MOTION FOR A
CONTINUANCE**

Frontier Communications, Inc., which should be designated Frontier North, Inc. ("Frontier"), Respondent herein, pursuant to Ohio Admin. Code §4901-1-12, moves for a continuance of the hearing scheduled for April 23, 2018 in the captioned case. Frontier is also filing, contemporaneously, a Motion to Compel related to the discovery it has served on the Complainant March 7, 2018. Frontier requires full and complete responses to that discovery in order to prepare for the hearing.

Complainant's refusal to respond to the Frontier's basic discovery request is preventing the Frontier from being able to prepare to put on its defense at the hearing. As a matter of due process, Frontier is entitled to responses to its discovery before a hearing can be held. The hearing must, therefore, be continued to a mutually agreeable date after the Complainant has fully responded to the discovery requests.

Respectfully submitted,



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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was filed electronically and provided to the person listed below by U.S. mail, postage prepaid, on April 18th, 2018, as well as certified mail.

Johnnie Graham Jr.
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Complainant



Michele Noble

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in

Case No(s). 17-2114-TP-CSS

Summary: Motion To Continue Hearing electronically filed by Michele L Noble on behalf of Frontier North Inc.