

FILE

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PUCO

August 26, 2005

Public Utilities Commission of Ohio  
Docketing Division  
180 East Broad Street  
Columbus, Ohio 43215-3793

Re: *Richards Ltd., Inc. v. Ameritech Mobile, et al.*  
Case No. 05-190-RC-CSS

Dear Sir or Madam:

Enclosed please find the original and ten (10) copies of Richards LTD, Inc. Motion to Stay Respondent's Motion to Dismiss or in the Alternate, for an Extension of Time to Respond.

Please cause the same to be filed with the Public Utilities Commission of Ohio.

Please return a time stamped copy of the complaint to my office in the self addressed stamped envelope enclosed.

I thank you for your kind consideration in this matter. If you have any questions do not hesitate to contact me.

Very truly yours,

*Carla M. Tricarichi*  
Carla M. Tricarichi

CMT/jg

Enclosures

cc: John McCaffrey, Esq.  
Mark Wallach, Esq.  
Stephen R. Patton, Esq.  
Hugh M. McKay, Esq.

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**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

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RICHARDS LTD., INC.,	)	
	)	Case No. 05-190-RC-CSS
Complainant,	)	
	)	Hearing Examiner Scott Farkas
v.	)	
	)	
AMERITECH MOBILE	)	
COMMUNICATIONS INC. N.K.A.	)	
CINGULAR WIRELESS <i>ET AL.</i>	)	
	)	
	)	
Respondents.	)	

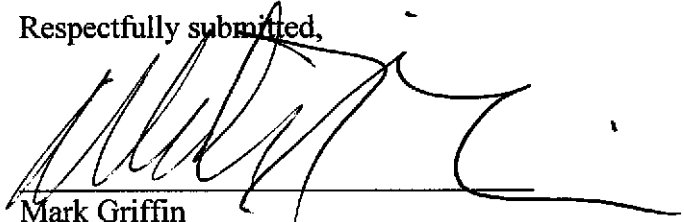
**COMPLAINANT'S MOTION  
TO STAY RESPONDENT'S MOTION TO DISMISS, OR,  
IN THE ALTERNATIVE, FOR AN EXTENSION OF TIME TO RESPOND**

Complainant moves to stay Respondent's Motion to Dismiss until the legal issues are fully and finally resolved in the companion case of *Discount Cellular v. Ameritech Mobile Communications, Inc.*, Case No. 04-236-RC-CSS. The issues in both cases are virtually identical. It is a waste of the Commission's resources to have duplicate cases, duplicate briefing and duplicate adjudications on the same issues. There is little advantage to having the same hundred pages of briefing repeated in multiple cases. Moreover, in the event that the Discount Cellular case is appealed to the Ohio Supreme Court, the issue will be resolved in a single case, rather than in multiple, duplicate cases that would only create confusion and waste. Accordingly, Complainant requests that the Commission stay this case until the legal issues in the Discount Cellular case are fully and finally adjudicated. In the alternative, Complainant requests an enlargement of time in which to file its brief contra Respondent's Motion to Dismiss

making Complainant's Brief Contra due ten days after the Commission rules on the instant motion.

For all the foregoing reasons, the Commission should stay Respondent's Motion to Dismiss.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Mark Griffin', written over a horizontal line.

Mark Griffin  
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**CERTIFICATE OF SERVICE**

I certify that a copy of the foregoing was served this 26<sup>th</sup> day of August 2005, by

regular U.S. mail upon the following:

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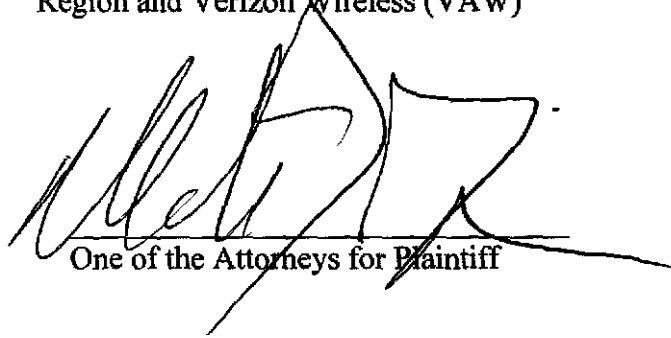
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One of the Attorneys for Plaintiff