Robinson+Cole

KENNETH C. BALDWIN

280 Trumbull Street Hartford, CT 06103-3597 Main (860) 275-8200 Fax (860) 275-8299 kbaldwin@rc.com Direct (860) 275-8345

Also admitted in Massachusetts and New York

July 6, 2021

Via Electronic Mail

Melanie A. Bachman, Esq. Executive Director/Staff Attorney Connecticut Siting Council 10 Franklin Square New Britain, CT 06051

Re: Docket No. 502 – Application of Cellco Partnership d/b/a Verizon Wireless for a Certificate of Environmental Compatibility and Public Need for the Construction, Maintenance and Operation of a Wireless Telecommunications Facility Located at 118 Newton Road, Woodbridge, Connecticut

Request for Extension of Time to Submit Responses to WNNET

Dear Ms. Bachman:

On behalf of Cellco Partnership d/b/a Verizon Wireless ("Cellco"), I hereby respectfully request an extension of time within which Cellco must respond to the WNNET Pre-Hearing Interrogatories – Set One dated June 29, 2021. As you know, the WNNET request for intervenor status is currently pending before the Council. If the request is granted, Cellco expects to be in a position to file these responses with the Council on or before July 23, 2021.

Thank you in advance for your cooperation. If you have any questions, please feel free to contact me.

Sincerely,

Kunig MM

Kenneth C. Baldwin

KCB/kmd

Boston | Hartford | New York | Providence | Stamford | Albany | Los Angeles | Miami | New London | rc.com

CERTIFICATION OF SERVICE

I hereby certify that on this 6th day of July 2021, a copy of the foregoing was sent, via

electronic mail, to the following:

Party Town of Woodbridge

Ira W. Bloom, Esq. Berchem Moses PC 1221 Post Road East Westport, CT 06880 ibloom@berchemmoses.com

Nicholas R. Bamonte, Esq. Berchem Moses PC 1221 Post Road East Westport, CT 06880 nbamonte@berchammoses.com

Gerald Weiner, Esq. Town Attorney Woodbridge Town Hall 11 Meetinghouse Lane Woodbridge, CT 06525 gweiner@aol.com

The Honorable Beth Heller First Selectman Woodbridge Town Hall 11 Meetinghouse Lane Woodbridge, CT 06525 <u>bheller@woodbridgect.org</u>

Intervenor WNNET (Status Pending)

Keith R. Ainsworth, Esq. Law Offices of Keith R. Ainsworth, Esq., LLC 51 Elm street, Suite 201 New Haven, CT 06510-2049 Keith.ainsworth@live.com

Intervenor Ochsner Place LLC (Status Pending)

Joel Z. Green, Esq. Linda P. Laske, Esq. Law Offices of Green and Gross, P.C. 1087 Broad Street Bridgeport, CT 06604 jgreen@gglaw.net LLaske@gglaw.net

Kunig MM

Kenneth C. Baldwin