

STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL

IN RE: :
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 :
 APPLICATION OF CELLCO PARTNERSHIP : DOCKET NO. 448
 D/B/A VERIZON WIRELESS FOR A :
 CERTIFICATE OF ENVIRONMENTAL :
 COMPATIBILITY AND PUBLIC NEED FOR :
 THE CONSTRUCTION OF A WIRELESS :
 TELECOMMUNICATIONS FACILITY AT :
 831 DERBY MILFORD ROAD, ORANGE, :
 CONNECTICUT : AUGUST 4, 2014

**MOTION FOR EXTENSION OF TIME TO RESPOND TO
ALBERT SUBBLOIE, JACQUELINE BARBARA,
GLENN MACINNES AND JILL MACINNES’
PRE-HEARING INTERROGATORIES AND REQUESTS FOR PRODUCTION**


Cellco Partnership d/b/a Verizon Wireless (“Cellco”) hereby moves the Connecticut Siting Council (“Council”) for an extension of time until Friday, August 8, 2014, to respond to Albert Subbloie, Jacqueline Barbara, Glenn Macinnes and Jill Macinnes’ (collectively the “Intervenors”) Pre-Hearing Interrogatories and Requests for Production, dated July 29, 2014 (“Interrogatories”), in the above-captioned proceeding. In support of this motion, Cellco states the following:

1. On July 29, 2014, the Intervenors issued the Interrogatories to Cellco, which contain seventy-five (75) interrogatories and requests for production.
2. On July 30, 2014, the Council issued a revised schedule, which requires responses by Cellco to the Interrogatories by August 5, 2014.
3. Cellco has begun to make progress on its responses. However, due to the large number of Interrogatories and the short time period in which to respond, Cellco requires

additional time to finish gathering the information and data necessary to most fully and accurately respond to the questions.

WHEREFORE, for all of the foregoing reasons, Cellco hereby requests that the Council grant an extension of time to respond to the Interrogatories until August 8, 2014.

Respectfully submitted,
CELLCO PARTNERSHIP d/b/a VERIZON
WIRELESS

By 
Kenneth C. Baldwin, Esq.
Alexander W. Judd, Esq.
Robinson & Cole LLP
280 Trumbull Street
Hartford, CT 06103-3597
Its Attorneys

CERTIFICATE OF SERVICE

I hereby certify that on this 4th day of August, 2014, a copy of the foregoing was sent electronically and/or first class mail, postage prepaid, to the following:

Albert Subbloie c/o Mario F. Coppola, Esq. Mark Kovack, Esq. Berchem, Moses and Devlin, P.C. 1221 Post Road East Westport, CT 06880	Jacqueline Barbara c/o Mario F. Coppola, Esq. Mark Kovack, Esq. Berchem, Moses and Devlin, P.C. 1221 Post Road East Westport, CT 06880
Glenn Macinnes c/o Mario F. Coppola, Esq. Mark Kovack, Esq. Berchem, Moses and Devlin, P.C. 1221 Post Road East Westport, CT 06880	Jill Macinnes c/o Mario F. Coppola, Esq. Mark Kovack, Esq. Berchem, Moses and Devlin, P.C. 1221 Post Road East Westport, CT 06880
State Senator Gayle Slossberg Legislative Office Building Room 2000 Hartford, CT 06106	State Representative Paul Davis Legislative Office Building Room 4045 Hartford, CT 06106
State Representative Themis Klarides Legislative Office Building Room 4200 Hartford, CT 06106	State Representative James Maroney Legislative Office Building Room 5006 Hartford, CT 06106



Kenneth C. Baldwin