

Before the
COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND CABLE

Petition of Recipients of Collect Calls from)
Prisoners at Correctional Institutions in) D.T.C. 11-16
Massachusetts Seeking Relief from the)
Unjust and Unreasonable Cost of such Calls)

MOTION FOR EXTENSION OF RESPONSE DEADLINE

Global Tel*Link Corporation (“GTL”), by its attorneys and pursuant to 220 C.M.R. § 1.02(5), respectfully moves for an extension of time to October 28, 2013 to respond to any appeal of the Hearing Officer Interlocutory Ruling issued September 23, 2013 (“*Interlocutory Ruling*”) in the above-referenced proceeding. In support of this Motion, GTL states:

1. The *Interlocutory Ruling* required any appeal to be filed within five days, and responses within two days thereafter. On September 26, 2013, Petitioners requested an extension of time until October 18, 2013 to file an appeal of the *Interlocutory Ruling*. On that same day, the Hearing Officer extended the time for filing an appeal of the *Interlocutory Ruling* until October 16, 2013.

2. On September 27, 2013, Securus Technologies, Inc. (“Securus”) filed a motion to extend the time for responding to any appeal of the *Interlocutory Ruling* until October 28, 2013. Securus explained that it would require additional time beyond the established two-day deadline to respond to any appeal filed.

3. To the extent an appeal of the *Interlocutory Ruling* is filed, it will likely raise numerous legal and factual issues. GTL agrees with Securus that reviewing the substance of any appeal and formulating a complete response would take more than two days. The additional time

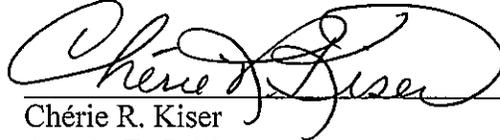
requested for responding will enable GTL to provide a more complete factual and legal record in this proceeding, which is in the best interest of the Department, the parties, and the public. No party will be harmed by the grant of this request.

4. 220 C.M.R. § 1.02(5) permits the Hearing Officer to extend time limits “for good cause shown.” For the reasons stated herein and in the motion filed by Securus, good cause exists to extend the deadline for filing a response to any appeal of the *Interlocutory Ruling* to October 28, 2013. GTL also reserves the right to request additional time to respond to any appeal filed once GTL has the opportunity to review such appeal.

Accordingly, GTL respectfully requests that the Department extend the time for filing a response to any appeal of the *Interlocutory Ruling* to October 28, 2013.

Respectfully submitted,

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Dated: October 1, 2013

CERTIFICATE OF SERVICE

I, Angela F. Collins, certify that on this 1st day of October 2013, I served a copy of the foregoing Motion for Extension of Response Deadline on the following via the method indicated:

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