

POLLACK & FLANDERS, LLP

185 DEVONSHIRE STREET © SUITE 401 BOSTON, MA 02110

TEL: 617.259.3000 FAX: 617.259.3050

January 31, 2011

VIA FIRST CLASS MAIL DELIVERY

Supreme Judicial Court for Suffolk County Attn: Eric B. Wetzel, Third Assistant Clerk John Adams Courthouse One Pemberton Square Boston, MA 02108



RE: BLC MANAGEMENT LLC d/b/a/ ANGLES COMMUNICATION SOLUTIONS v. DEPT. OF TELECOMMUNICATIONS & CABLE DOCKET NO. 2010-0418

Dear Mr. Wetzel:

Enclosed for filing in the above-captioned case, please find the following document:

1. Joint Motion to Approve Briefing Schedule

Thank you for your attention to this matter.

Very truly yours,

POLLACK & FLANDERS, L.L.P.

Natalie A. Heineman, Esq.

NAH/nah

Enclosure

Cc: All parties included on the Service List of the enclosed motion

COMMONWEALTH OF MASSACHUSETTS SUPREME JUDICIAL COURT for SUFFOLK COUNTY

BLC MANAGEMENT LLC d/b/a ANGLES COMMUNICATION SOLUTIONS,

NO. 2010-0418

Appellant,

v.

DEPARTMENT OF TELECOMMUNICATIONS AND CABLE,

Appellee.

ON APPEAL FROM ORDER ISSUED BY THE DEPARTMENT OF TELECOMMUNICATIONS AND CABLE

JOINT MOTION TO APPROVE BRIEFING SCHEDULE

NOW COME the Appellant, BLC Management LLC d/b/a Angles Communication Solutions, and the Appellee, Department of Telecommunications and Cable (jointly, the "Parties"), and hereby respectfully request that the Court approve the briefing schedule set forth below upon which the Parties have agreed:

- 1. Appellant's principal brief filed and served by April 8, 2011.
- 2. Appellee's opposing brief filed and served by May 27, 2011.
- 3. Appellant's reply brief filed and served by June 24, 2011

WHEREFORE, the Parties hereby respectfully request that the Court i) grant this joint motion and approve the briefing schedule set forth above, and ii) grant to the Parties such other and further relief as the Court deems just and proper.

Dated: January 31, 2011

Respectfully submitted,

BLC MANAGEMENT LLC d/b/a ANGLES COMMUNICATION SOLUTIONS, By its attorneys,

Anthony L. Gray (BBO No. 564415)

Natalie A. Heineman (BBO No. 670920)

POLLACK & FLANDERS, L.L.P.

185 Devonshire Street, Suite 401

Boston, MA 02110

Tel. 617-259-3000

Lance J.W. Steinhart NAM

Lance J.M. Steinhart

LANCE J.M. STEINHART, P.C.

1720 Windward Concourse, Suite 115

Alpharetta, GA 30005

Tel. 770-232-9200

DEPARTMENT OF TELECOMMUNICATIONS & CABLE, By its attorney(s),

Sookyoung 8hin /NAH Sookyoung Shin (BBO No. 643713)
Assistant Attorn

Assistant Attorney General

Government Bureau

Office of the Attorney General Commonwealth of Massachusetts

One Ashburton Place

Boston, MA 02108

Tel. 617-727-2200

CERTIFICATE OF SERVICE

I, Natalie A. Heineman, hereby certify that on this 31th day of January 2011, I served a true and accurate copy of the foregoing document on each of the persons or entities listed on the parties or counsel of record listed below via first class mail, postage pre-paid, except as otherwise indicated.

Natalie A. Heineman

Sookyoung Shin, Esq.
Assistant Attorney General
Government Bureau
Office of the Attorney General
Commonwealth of Massachusetts
One Ashburton Place
Boston, MA 02108

Catrice Williams, Department Secretary
Department of Telecommunications and Cable
1000 Washington Street
Suite 820
Boston, MA 02118-650

Alexander W. Moore, Esq. Associate General Counsel Verizon 125 High Street Oliver Tower, 7th Floor Boston, MA 02110

Martin O'Malley Verizon 185 Franklin Street Boston, MA 02110