

**COMMONWEALTH OF MASSACHUSETTS  
DEPARTMENT OF TELECOMMUNICATIONS AND CABLE**

**No. D.T.C. 11-16**

**PETITION OF RECIPIENTS OF COLLECT CALLS FROM  
PRISONERS AT CORRECTIONAL INSTITUTIONS IN MASSACHUSETTS  
SEEKING RELIEF FROM  
THE UNJUST AND UNREASONABLE COST OF SUCH CALLS**

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**PETITIONERS' MOTION FOR EXTENSION OF TIME  
TO FILE MOTION TO COMPEL IC SOLUTIONS' RESPONSES**

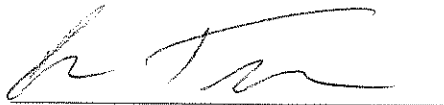
The Petitioners seek leave to file a motion to compel discovery responses from IC solutions until Friday, June 13, 2014 and in support state the following:

1. IC Solutions did not serve Petitioners with its narrative discovery responses or its responsive documents by mail, nor did it advise counsel for Petitioners in advance that it would provide only electronic service.
2. Counsel for Petitioners did not see the email with IC Solutions responses that had been sent on April 29, 2014, and one of Petitioners' counsel was not included in that email. Counsel for Petitioners assumed, given IC Solutions' limited role in the case to date, that the company had chosen not to respond.
3. On March 28, 2014 Counsel for Petitioners informed counsel for IC Solutions of their understanding that IC Solutions had not provided any responses, and were directed on that date to the responses IC Solutions had provided.
4. The Petitioners require time to review the responses of IC Solutions, confer with counsel for IC Solutions if needed, and prepare a motion to compel discovery, if needed. Given

counsel's obligations in other cases, and their administrative responsibilities at Prisoners Legal Services, they require until Friday, June 13 to do so.

Date: April 30, 2014

Respectfully submitted:



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#### CERTIFICATE OF SERVICE

I hereby certify that a true copy of the above document was served upon the attorney of record for each other party by mail ~~(by hand)~~

on April 30, 2014

by 