

**STATE OF VERMONT  
PUBLIC UTILITY COMMISSION**

Case No. 24-3345-PET

**Limited Size and Scope Application** )  
of Bell Atlantic Mobile Systems, LLC )  
d/b/a Verizon Wireless and Vertex Towers, LLC, )  
for a Certificate of Public Good, )  
pursuant to 30 V.S.A. § 248a, authorizing the construction )  
of a telecommunications facility in Manchester, Vermont )

**MOTION FOR SUMMARY JUDGEMENT**

NOW COMES Petitioner Vertex Towers, LLC (“Vertex”), Bell Atlantic Mobile Systems, LLC d/b/a Verizon Wireless (“Verizon;” collectively, “Petitioner”), and pursuant to Rule 2.219 of this Commission’s Rules of Procedure, and hereby files this Motion for Summary Judgment. As stated herein, Petitioner requests that it be granted a Certificate of Public Good. This motion is supported by the Statement of Material Facts, Memorandum in Support of Motion for Summary Judgement, Declaration of Tim Parks, Declaration of A.J. LaRosa, Declaration of Brendan M. Gill, and the exhibits sponsored therein.

WHEREFORE the Petitioner requests the Commission grant the Motion for Summary Judgement and issue an Order and Certificate of Public Good authorizing the construction of a telecommunications facility as described in Case No. 24-3345-PET in the Town of Manchester, Vermont.

Dated in Burlington, Vermont this 15<sup>th</sup> day of December, 2025

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