

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

**TOWN OF MANCHESTER'S MOTION FOR EXTENSION OF TIME BASED ON
EXTRAORDINARY CIRCUMSTANCES**

NOW COMES the Town of Manchester and files a motion to extend its time under the existing briefing schedule to file its opposition to Petitioner's Motion for Summary Judgment, and Cross Motion for Summary Judgment in the above-captioned matter, until Friday January 23, 2026. In support of the motion the undersigned states as follows:

Rule 2.207(C) provides that, "absent extraordinary circumstances, any motion to extend a deadline must be filed at least 3 days before the deadline and must set forth good cause why the extension should be granted." Good cause exists to extend the deadline because on the afternoon of January 15, 2026, due to an undetermined technical error with a new practice management system, the undersigned lost a substantial amount of work on the filing on the same day that it was due at 4:30 p.m. The undersigned made earnest efforts to recreate the work within the allotted time, but it is not possible to recreate the filing by the deadline. Counsel has several conflicts on the calendar in the next few business days; accordingly, the Town requests an extension until Friday January 23, 2026, along with a commensurate extension of time for responsive filings from other parties.

Because the loss of work product occurred on the day of the deadline, it was not possible for this request to be filed three days prior to the deadline.

Counsel for the Petitioner has consented to the requested relief. Counsel for the Department of Public Service has not responded to the request for consent in the very brief time since the undersigned requested such consent.

Dated this 15th day of January, 2026.

/s/Merrill E. Bent

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