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VERMONT PUBLIC  
SERVICE BOARD

2016 JUL 29 PM 4 11  
HD

Leslie A. Cadwell  
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802-342-3114

July 28, 2016

**By Email and Overnight Delivery**

Judith C. Whitney, Clerk  
Vermont Public Service Board  
112 State Street  
Montpelier, VT 05620-2701

Re: Docket No. 8585; Request for Extension of Deadline to Respond to Summary Judgment Motion

Dear Mrs. Whitney:

I am writing to respectfully request that the July 29, 2016 deadline for responding to the Department of Public Service's motion for summary judgment in this matter be extended until after the Respondent has had the opportunity to discover relevant information from the Department and the Town of Irasburg that is currently unavailable to Respondent. A revised deadline of August 10, 2016 would enable Respondent to complete discovery on Non-Respondents by August 7, 2016 and then incorporate essential facts into Respondent's opposition to the summary judgment motion.

I sought consent from the other parties to this extension request and only the Department responded; the Department opposes the extension.

In support of this request, please find enclosed an affidavit of counsel pursuant to V.R.C.P. 56(d) demonstrating why Respondent cannot present facts essential to justify its opposition to the Department's Motion for Summary Judgment without the opportunity for discovery on the Town of Irasburg and Department of Public Service.

Judith C. Whitney, Clerk

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I would be grateful for your assistance in bringing this request to the Hearing Officer's attention as soon as possible. Thank you, and please contact me should you have any questions.

Very truly yours,



Leslie A. Cadwell

Enclosure

Cc: Geoffrey Commons & Aaron Kisicki, Vermont Department of Public Service  
Leslie A. Welts, Vermont Agency of Natural Resources  
Robert R. Holland, for the Town of Irasburg

