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IN THE SUPREME COURT OF THE STATE OF IDAHO

IDAHO TELEPHONE ASSOCIATION,
CITIZENS TELECOMMUNICATIONS
COMPANY OF IDAHO, CENTURYTEL OF
IDAHO, CENTURYTEL OF THE GEM
STATE, POTLATCH TELEPHONE
COMPANY and ILLUMINET, INC.

Respondents,

vs.

QWEST CORPORATION,

Appellant.

Docket No. 30107
DC Docket No. QW-T-03-01

**QWEST CORPORATION'S MOTION
FOR EXTENSION OF TIME TO FILE
REPLY BRIEF AND MOTION TO
EXPEDITE DECISION THEREON**

1. Pursuant to Idaho Appellate Rules 34(e) and 46, Appellant Qwest Corporation (Qwest), hereby moves for an extension of time in which to file its Appellant's brief, from June 10, 2004 to July 1, 2004. Idaho Appellate Rule 46 provides that "[t]he time prescribed by these rules ... may be enlarged by the Court or any Justice thereof for good cause shown upon the motion of a party." I.A.R. 46 (2003). Idaho Appellate Rule 34(e) requires a "clear showing of

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good cause” and an affidavit in support of the motion. I.A.R. 34(e) (2003). In accordance with Rule 34(e), Qwest submits the Affidavit of Charles W. Steese, dated May 25, 2004.

2. Qwest’s Reply Brief is presently due on June 10, 2004. This is the first request for an extension of the deadline to file the Reply Brief although Qwest and Respondents have each been granted an extension for the filing their respective Appellant’s and Respondents’ briefs. No previous requests have been denied.

3. Good cause exists for the extension that Qwest seeks. Qwest’s lead counsel, Chuck Steese, is currently occupied filing several motions to dismiss and/or for summary judgment in an AAA arbitration which must be completed by May 26, 2004. Thereafter Mr. Steese is on vacation until May 31, 2004, and will be in Baltimore, Maryland defending depositions in a complex copyright matter during the week of June 7, 2004.

4. Due to scheduling conflicts described in his Affidavit, Mr. Steese will have inadequate time to prepare the Reply Brief in this matter until after June 10, 2004. Because the Reply Brief requires presentation of complex telecommunications facts to the Court, Mr. Steese’s participation in the briefing is essential. Qwest therefore requests an extension of the filing deadline for 21 calendar days, from June 10, 2004 to July 1, 2004. The Court granted an extension of 28 days to Respondents for filing their brief on virtually identical grounds.

5. Furthermore, because the present deadline is less than three weeks out, Qwest moves the Court to expedite its decision on this Motion.

6. Qwest’s counsel conferred with counsel for Respondents Illuminet, Inc., Electric Lightwave, Inc., Citizens Telecommunications Co. of Idaho, and the Idaho Telephone Association, regarding this Motion. Opposing counsel confirm that Respondents will not oppose this Motion.

WHEREFORE, Appellant Qwest Corporation requests that the Court extend the deadline in which to file the Reply Brief, from June 10, 2004 to July 1, 2004, and that the Court expedite its ruling on this Motion.

RESPECTFULLY SUBMITTED this 26th day of May 2004.



Mary S. Hobson
Stoel Rives, LLP

Charles W. Steese
Steese & Evans, P.C.

Attorneys for Qwest Corporation

CERTIFICATE OF SERVICE

I hereby certify that on this 26th day of May 2004, I served the **MOTION FOR EXTENSION TO FILE REPLY BRIEF AND MOTION TO EXPEDITE DECISION** as follows:

Weldon Stutzman	<input checked="" type="checkbox"/>	Hand Delivery
Deputy Attorney General	<input type="checkbox"/>	U. S. Mail
Idaho Public Utilities Commission	<input type="checkbox"/>	Overnight Delivery
472 West Washington Street	<input type="checkbox"/>	Facsimile
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Docket No. 30107
DC Docket No. QW-T-03-01

**AFFIDAVIT OF CHARLES W. STEESE IN
SUPPORT OF QWEST CORPORATION'S
MOTION FOR EXTENSION OF TIME TO
FILE REPLY BRIEF**

I, Charles W. Steese, being over 18 years old and having personal knowledge of each fact asserted in this Affidavit, hereby attest as follows.

1. Qwest's Reply Brief is presently due on June 10, 2004.
2. No extensions of time have previously been granted on this brief.
3. No previous requests for extensions of time have been denied or denied in part.

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CERTIFICATE OF SERVICE

I hereby certify that on this 26th day of May 2004, I served the **AFFIDAVIT OF CHARLES W. STEESE IN SUPPORT OF QWEST CORPORATION'S MOTION FOR EXTENSION OF TIME TO FILE REPLY BRIEF** as follows:

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