

**BEFORE THE STATE CORPORATION COMMISSION  
OF THE STATE OF KANSAS**

In the Matter of the Application of Totah )  
Communications, Inc. for Additional Kansas ) Docket No. 24-TTHT-343-KSF  
Universal Service Fund Support Pursuant to )  
K.S.A. 66-2008. )

**JOINT MOTION FOR PROCEDURAL SCHEDULE, PROTECTIVE ORDER, AND  
DISCOVERY ORDER**

Staff of the Kansas Corporation Commission ("Staff" and "Commission", respectively) and Totah Communications, Inc. ("Totah") (together, "Joint Movants") hereby move the Commission for an Order establishing a procedural schedule, a Protective Order, and a Discovery Order in the above-captioned matter. In support of the Motion, Joint Movants state the following:

1. On October 18, 2023, Totah filed an Application for additional Kansas Universal Service Fund ("KUSF") support.<sup>1</sup>

2. Joint Movants conferred to develop a procedural schedule for this docket to propose to the Commission for consideration. The proposed schedule, as agreed upon by the Joint Movants, is as follows:

Staff and Intervenor Testimony Due	Thursday, February 22, 2024
Cross-Answering Testimony Due	Thursday, February 29, 2024
Totah Rebuttal Testimony Due	Friday, March 8, 2024
Settlement Conference	Tuesday, March 19, 2024 Time and Location TBD by Parties
Discovery Cutoff	Tuesday, March 19, 2024
Settlement Due Date	Tuesday, March 26, 2024
Testimony in Support of Settlement Due	Tuesday, April 2, 2024
Prehearing Conference	Tuesday, April 2, 2024 9:00 a.m. via Zoom
Evidentiary Hearing	Tuesday, April 9, 2024 9:00 a.m. in the Commission's First Floor Hearing Room (Topeka) or via Zoom, at the Commission's preference

<sup>1</sup> Application for Totah Communications, Inc. (Oct. 18, 2023) ("Application").

Total Initial Brief	Thursday, April 18, 2024
Staff and Intervenor Responsive Brief	Thursday, April 25, 2024
Total Reply Brief	Thursday, May 2, 2024
Commission Order Date	Friday, June 14, 2024

3. The discovery requests being shared amongst Parties may contain confidential information. The Joint Movants respectfully request the Commission issue a Protective Order and a Discovery Order in this docket to govern the exchange of discovery and access to confidential information.

WHEREFORE, Joint Movants respectfully request the Commission grant this Motion and issue an Order approving the procedural schedule, as well as issue a Protective Order and Discovery Order in this docket as set forth above.

Respectfully submitted,

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## CERTIFICATE OF SERVICE

24-TTHT-343-KSF

I, the undersigned, certify that a true and correct copy of the above and foregoing Joint Motion for Procedural Schedule, Protective Order and Discovery Order this 8th day of December, 2023, to the following:

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*/s/ Ann Murphy*

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Ann Murphy