# COLLEEN R. JAMISON JAMISON LAW, LLC

August 31, 2021

Lynn M. Retz, Executive Director Kansas Corporation Commission 1500 SW Arrowhead Rd. Topeka, KS 66604

RE: Joint Motion for Procedural Schedule, Protective Order, and Discovery Order

Docket No. 22-CRKT-087-KSF

Dear Ms. Retz:

Attached for filing please find a Joint Motion for Procedural Schedule, Protective Order, and Discovery Order from Craw-Kan Telephone Cooperative, Inc., and Commission Staff.

If you have any questions, please let me know.

Sincerely,

JAMISON LAW, LLC

Colleen R. Jamison

Colleen R. Jamison

Att.

cc: Michael Neeley

Ahsan Latif Craig Wilbert Stacey Brigham

### BEFORE THE STATE CORPORATION COMMISSION OF THE STATE OF KANSAS

In the Matter of the Application and	)	
Request of Craw-Kan Telephone	)	
Coopeartive, Inc. for an Increase in its	)	Docket No. 22-CRKT-087-KSF
Cost-Based Kansas Universal Service	)	
Fund Support.	)	

## $\frac{\textbf{JOINT MOTION FOR PROCEDURAL SCHEDULE, PROTECTIVE ORDER, AND}}{\textbf{DISCOVERY ORDER}}$

The Staff of the Kansas Corporation Commission (Staff and Commission, respectively) and Craw-Kan Telephone Cooperative, Inc. ("Craw-Kan") (together, "Joint Movants") hereby move the Commission to adopt the following procedural schedule in this matter:

Staff and Intervenor Testimony Due	Wednesday, December 15, 2021	
Cross-Answering Testimony Due	Wednesday, December 22, 2021	
Craw-Kan Rebuttal Testimony Due	Thursday, December 30, 2021	
Settlement Conference	Friday, January 7, 2022	
	Time and Location TBD by Parties	
Discovery Cutoff	Friday, January 7, 2022	
Settlement Due Date	Wednesday, January 12, 2022	
Testimony in Support of Settlement Due	Wednesday, January 19, 2022	
Prehearing Conference	Wednesday January 19 2022	
	9:00 a.m. in the Commission's Third Floor	
	Conference Room (Topeka)	
Evidentiary Hearing	Wednesday, January 26, 2022	
	9:00 a.m. in the Commission's First Floor	
	Hearing Room (Topeka)	
Craw-Kan Initial Brief	Friday, February 11, 2022	
Staff and Intervenor Responsive Brief	Friday, February 18, 2022	
Craw-Kan Reply Brief	Friday, February 25, 2022	
Commission Order Date	Monday, April 11, 2022	

WHEREFORE, the Joint Movants respectfully move the Commission to adopt the proposed procedural schedule at the times most convenient to the Commission, and hold any conferences or evidentiary hearings at the Commission's Topeka Office, 1500 SW Arrowhead

Rd., Topeka, KS 66604. Furthermore, the Joint Movants move the Commission to adopt a Protective Order and Discovery Order.

Respectfully Submitted,

#### <u>Michael Neeley</u>

Michael Neeley, S. Ct. #25027 Senior Litigation Counsel Ahsan Latif, S. CT. #24709 Attorneys for Staff Kansas Corporation Commission 1500 S.W. Arrowhead Road Topeka, Kansas 66604-4027 E-mail: m.neelev@kcc.ks.gov

mail: m.neeley@kcc.ks.gov a.latif@kcc.ks.gov

Phone: 785-271-3173

### Colleen R. Jamison

Colleen R. Jamison, KS Bar #16121 JAMISON LAW, LLC Attorney for Craw-Kan Telephone Cooperative, Inc. PO Box 128 Tecumseh, KS 66542

Ph: 785-331-8214

Email: colleen.jamison@jamisonlaw.legal

2

\

#### **VERIFICATION**

I, the undersigned, hereby certify under penalty of perjury pursuant to K.S.A. 53-601 that I am an attorney for Craw-Kan Telephone Cooperative, Inc. and that the foregoing is true and correct. Executed on August 31, 2021.

Colleen R. Jamison
Colleen R. Jamison

**CERTIFICATE OF SERVICE** 

The undersigned certifies that on August 31, 2021, she emailed the above Joint Motion to the following persons listed on the Commission's website for this docket as the "service list":

BRIAN FEDOTIN, GENERAL COUNSEL KANSAS CORPORATION COMMISSION 1500 SW ARROWHEAD RD TOPEKA, KS 66604 b.fedotin@kcc.ks.gov

AHSAN LATIF, LITIGATION COUNSEL KANSAS CORPORATION COMMISSION 1500 SW ARROWHEAD RD TOPEKA, KS 66604 a.latif@kcc.ks.gov

MICHAEL NEELEY, SENIOR LITIGATION COUNSEL KANSAS CORPORATION COMMISSION 1500 SW ARROWHEAD RD TOPEKA, KS 66604 m.neeley@kcc.ks.gov

CRAIG WILBERT, GENERAL MANAGER CRAW-KAN TELEPHONE COOPERATIVE, INC. 200 N OZARK PO BOX 100 GIRARD, KS 66743 crwilbert@ckt.net

STACEY BRIGHAM, TCA - TELECOM CONSULTING ASSOCIATION S&T COMMUNICATIONS LLC 320 KANSAS AVE PO BOX 99 BREWSTER, KS 67732 SBRIGHAM@TCATEL.COM

<u>Colleen R. Jamison</u>

Colleen R. Jamison