

**Before the  
Federal Communications Commission  
Washington, DC 20554**

In the Matter of	*	
Petition for Expedited Declaratory Ruling or,	*	
in the Alternative, Request for Retroactive	*	
Waiver	*	CG Docket No. 02-278
	*	
Rules and Regulations Implementing the	*	
Telephone Consumer Protection Act of 1991	*	
	*	

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**MOTION FOR EXTENSION OF TIME TO FILE OPPOSITION TO  
PETITION FOR EXPEDITED DECLARATORY RULING OR, IN  
THE ALTERNATIVE, REQUEST FOR RETROACTIVE WAIVER**

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COUNSEL FOR TAYLOR CARROLL

December 20, 2018

Taylor Carroll (“Carroll”), through undersigned counsel, intends to file an opposition to the Petition for Expedited Declaratory Ruling or, in the Alternative, Request for Retroactive Waiver (“Petition”) filed by SGS North America, Inc. (“SGS”) on December 17, 2018. Through this Motion, Carroll requests a ten-day extension of the deadline to file an opposition to SGS’s Petition until January 7, 2018.

Pursuant to 47 C.F.R. §1.45, an opposition to SGS’s Petition is due within ten days of its filing date, or by December 27, 2018.<sup>1</sup> Although extensions of time are not routinely granted by the Commission, Carroll respectfully submits that the current deadline falls during the end-of-year holidays. Accordingly, Taylor requests a brief ten-day extension, or until January 7, 2019, to file an opposition. Pursuant to 47 C.F.R. §1.46(b), if this motion is denied, Carroll’s opposition shall not be due until two business days after the Commission acts on this motion.

Although extensions of time to file oppositions are not routinely granted, there is precedence for the Commission to grant extensions under similar circumstances. In consideration of the end of year holidays, the Chief of the Media Bureau under the FCC extended the deadline for filing oppositions to a petition for reconsideration by fourteen days. *Amendment of Section 73.3555(e) of the Commission’s Rules, National Television Multiple Ownership Rule*, MB Docket No. 13-236, Order, DA 16-1420, 31 FCC Rcd. 13324 (2016). Like that matter, a brief, ten-day extension of the deadline in this matter, which runs during the end of year holidays, will not interfere with the Commission’s

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<sup>1</sup> See 47 C.F.R. §1.45(b)

consideration of SGS's Petition. Also, this brief extension should not prejudice any party.

Accordingly, Carroll respectfully requests a brief extension, until January 7, 2019, to file an opposition to SGS's Petition for Expedited Declaratory Ruling or, in the Alternative, Request for Retroactive Waiver. Counsel for SGS was contacted about this request for an extension of the deadline and responded that he has no objection to it. In addition, the Commission staff has been notified of Carroll's intent to file this Motion.

Respectfully submitted,  
**KEOGH, COX & WILSON, LTD**

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