

Exhibit 1

**Securus and GTL Applications for Supersedeas
With the Alabama Supreme Court**

December 17, 2014



VIA ELECTRONIC FILING AND HAND DELIVERY

Mr. Walter Thomas, Secretary
Alabama Public Service Commission
100 N. Union Street, Suite 850
RSA Union Building
Montgomery, AL 36104

**RE: In re: Generic Proceeding Considering the Promulgation of Telephone
Rules Governing Inmate Phone Services,
Docket 159578**

Dear Mr. Thomas,

Enclosed please find documents filed with the appeals court today.

Very truly yours,

A handwritten signature in cursive script that reads "Laura S. Gibson".

Laura S. Gibson

LSG/lg
Enclosure(s)

cc: Chief Administrative Law Judge John A. Garnier (w/enclosures)

DEC 16 2014

CLERK
SUPREME COURT OF ALABAMA

Circuit Court No. _____ *Supreme Court No.* _____

APPEAL
TO
**Supreme Court
of Alabama**

FROM

SECURUS TECHNOLOGIES, INC.

Appellant

vs.

ALABAMA PUBLIC SERVICE COMMISSION

Appellee

FILED

DEC 16 2014

COURT OF
CIVIL APPEALS

State of Alabama Unified Judicial System Form ARAP-1 (front) Rev.1/97	NOTICE OF APPEAL TO THE (Check appropriate block)	Civil Action Number:
	<input checked="" type="checkbox"/> SUPREME COURT OF ALABAMA <input type="checkbox"/> COURT OF CIVIL APPEALS OF ALABAMA	

IN THE _____ COURT OF _____ COUNTY, ALABAMA

APPELLANT	SECURUS TECHNOLOGIES, INC.
V. APPELLEE	ALABAMA PUBLIC SERVICE COMMISSION
TRIAL JUDGE	
DATE OF JUDGMENT: December 9, 2014	DATE OF POST - JUDGMENT ORDER:

NOTICE IS HEREBY GIVEN THAT SECURUS TECHNOLOGIES, INC. appeal(s) to the above-named court from the Final Judgment Order Further Order Adopting Prison Calling Service in Docket 15957 entered in this cause. (describing it)

CHECK THE PROPER DESCRIPTION OF THE APPEALED CASE UNDER THE APPROPRIATE COURT:

<p style="text-align: center;">SUPREME COURT</p> <p>1. <input type="checkbox"/> Summary Judgment, amount claimed more than \$ 50,000</p> <p>2. <input type="checkbox"/> Judgment Amount exceeds \$50,000</p> <p>3. <input type="checkbox"/> Amount Sought in trial court more than \$50,000, Judgment for defendant</p> <p>4. <input checked="" type="checkbox"/> Equitable Relief, except for domestic relations</p> <p>5. <input checked="" type="checkbox"/> Other: <u>STAY OF IMPLEMENTATION OF ORDER</u></p>	<p style="text-align: center;">COURT OF CIVIL APPEALS</p> <p>1. <input type="checkbox"/> Summary Judgment, amount claimed \$ 50,000 or less</p> <p>2. <input type="checkbox"/> Judgment Amount \$50,000 or less</p> <p>3. <input type="checkbox"/> Amount Sought \$50,000 or less, judgment for defendant</p> <p>4. <input type="checkbox"/> Workmen's Compensation</p> <p>5. <input type="checkbox"/> Domestic Relations</p> <p>6. <input type="checkbox"/> Other: _____</p>
--	--

APPELLANT FILES WITH THIS NOTICE OF APPEAL:

1. <input checked="" type="checkbox"/> Security for costs of appeal 2. <input checked="" type="checkbox"/> A supersedeas bond in the amount of \$ <u>485,000.00</u> 3. <input type="checkbox"/> Deposited cash security in the amount of \$ _____	4. <input type="checkbox"/> Is exempted by law from giving security for costs of appeal by virtue of _____
---	--

Filed _____ (Date)	<u>2025 Third Ave. North, Ste. 500</u> Address <u>Birmingham, AL 35203</u>	<u>(205) 323-1888</u> Telephone Number
CERTIFIED AS A TRUE COPY	<u>J. MARK WHITE</u> Appellant or Attorney for Appellant Email <u>MWhite@whitearnolddowd.com</u>	
Circuit Clerk _____		

SECURITY FOR COSTS

We hereby acknowledge ourselves security for costs of appeal. For the payment of all costs secured by this undertaking, we hereby waive our right of exemption as to personal property under the Constitution and laws of the State of Alabama.

Executed with our seals this 16th day of December, 2014

Filed and approved: _____ (Date)	<u>[Signature]</u> Appellant principal (L.S.)	
	<u>[Signature]</u> Surety (L.S.)	
	<u>[Signature]</u> Surety (L.S.)	

Circuit Clerk _____
(Amended November 9, 1976; October 1, 1991.)

SUPERSEDEAS BOND

We, the undersigned principal and sureties, hereby acknowledge ourselves bound unto The Supreme Court of Alabama in the sum of \$485,000.00 Dollars, for the payment of which we bind ourselves, and each other, our heirs, executors, [(for amount of bond see Rule 8(a) and administrators, jointly and severally, and as part of this undertaking) we hereby waive our rights of exemption as to personal property under the Constitution and laws of the State of Alabama.

FILED

DEC 16 2014

FILED

DEC 16 2014

CLERK
SUPREME COURT OF ALABAMA

COURT OF
CIVIL APPEALS

WHEREAS, the above-named appellee (s) recovered a judgment against appellant (s) for the sum of _____ Dollars (and the further acts or duty _____) [describing judgment in addition to or other than for money only] _____ Dollars, the costs in that behalf expended.

NOW, therefore, the condition of the foregoing obligation is such that, if the appellant shall prosecute this appeal to effect, and satisfy such judgment, penalties, and costs including costs of appeal as may be rendered in this case, then the said obligation to be null and void, otherwise to remain in full force and effect.

Executed with our seals this 16th day of December, 2014.

Filed and approved: _____ (Date)

** Supersedeas Bond attached* (L.S.)
Appellant-principal

Surety (L.S.)

Circuit Clerk

Surety (L.S.)

EXECUTION OF JUDGMENT STAYED:

Bond fixed at: \$ 485,000.00
(Not required for money judgment only.)

Circuit Judge (L.S.)

DESIGNATION OF RECORD ON APPEAL

DESIGNATION OF CLERK'S RECORD: Appellant requests the clerk to include the following checked materials in the clerk's record:

- 1. Complaint
- 2. Answer
- 3. Counter-claim
- 4. Cross-Claim
- 5. Third-party Complaint
- 6. Third-party Answer
- 7. Motion to dismiss
- 8. Pretrial order

- 9. Entire record (less those items set forth in Rule 10 (a))
- 10. Motion for summary judgment
- 11. Opposition to motion for summary judgment
- 12. Final (Judgment) (Order)
- 13. Motion for New Trial
- 14. Ruling on Motion
- 15. Others: _____
- 16. Exhibit Number: _____

TRANSCRIPT STATUS

- Transcript will not be ordered. [See Rule 10(b), ARAP.]
- Transcript will be ordered. [See Rules 10(b)(2) and 11 (a)(2), ARAP. Form 1A or 1B.] Court reporter(s): _____

NOTE: If more than one court reporter was involved in this case, you must file a Transcript Purchase Order Form in compliance with Rules 10(b) and 11(c), Form 1A or 1B of the ARAP, for each court reporter. (Amended October 1, 1991.)

CERTIFICATE OF FILING

I certify that I have this date filed with the clerk of the trial court the original and _____ copies of the foregoing notice of appeal (along with \$ 200 docket fee), and such other instruments as have been completed and included herein. A true copy of each of these items will be served by the clerk of the trial court on each of the following:

- 1) Clerk of the appellate court, (the \$ 200 docket fee shall be transmitted with this filing) or affidavit of hardship.
- 2) Court Reporter.
- 3) Counsel for appellee, or appellee if no counsel.
Name: Alabama Public Service Commission
Address: 100 North Union Street, Ste. 850, Montgomery, AL, 36104

DATED this 16th day of December, 2014.

Samuel Gibson
Attorney for Appellant

(Amended October 1, 1991.)

IN WITNESS WHEREOF, SECURUS TECHNOLOGIES, INC., as Principal and Ironshore Indemnity, Inc., as Surety, have hereunto set our hands this 11th day of December, 2014.

SECURUS TECHNOLOGIES, INC.
Principal

WITNESS:

BY: _____

BY: _____

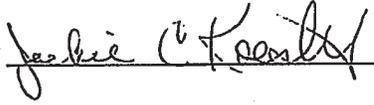

Geoffrey M. BOYD, CFO

IRONSHORE INDEMNITY INC.,
Surety

BY: Sandra L. Fusinetti
Sandra L. Fusinetti,
Attorney-in-Fact

WITNESS:

BY: _____



POWER OF ATTORNEY

III- 6000245

Ironshore Indemnity Inc.

KNOW ALL MEN BY THESE PRESENTS, that IRONSHORE INDEMNITY INC., a Minnesota Corporation, with its principal office in New York, NY does hereby constitute and appoint: Brook T. Smith, Raymond M. Hundley, Jason D. Cromwell, James H. Martin, Sandra L. Fusinetti, Deborah Neichter, Jill Kemp, Jackie C. Koestel, Sheryon Quinn, Dawson West, Bonnie J. Wortham, Amy Meredith, Lynnette Long, Barbara Duncan, Mark A. Guidry, Michele Lacrosse and Summer A. Betting its true and lawful Attorney(s)-In-Fact to make, execute, seal and deliver for, and on its behalf as surety, any and all bonds, undertakings or other writings obligatory in nature of a bond.

This authority is made under and by the authority of a resolution which was passed by the Board of Directors of IRONSHORE INDEMNITY INC. on the 22nd day of April, 2013 as follows:

Resolved, that the Director of the Company is hereby authorized to appoint and empower any representative of the company or other person or persons as Attorney-In-Fact to execute on behalf of the Company any bonds, undertakings, policies, contracts of indemnity or other writings obligatory in nature of a bond not to exceed \$5,500,000 dollars, which the Company might execute through its duly elected officers, and affix the seal of the Company thereto. Any said execution of such documents by an Attorney-In-Fact shall be as binding upon the Company as if they had been duly executed and acknowledged by the regularly elected officers of the Company. Any Attorney-In-Fact, so appointed, may be removed for good cause and the authority so granted may be revoked as specified in the Power of Attorney.

Resolved, that the signature of the Director and the seal of the Company may be affixed by facsimile on any power of attorney granted, and the signature of the Secretary, and the seal of the Company may be affixed by facsimile to any certificate of any such power and any such power or certificate bearing such facsimile signature and seal shall be valid and binding on the Company. Any such power so executed and sealed and certificate so executed and sealed shall, with respect to any bond of undertaking to which it is attached, continue to be valid and binding on the Company.

IN WITNESS THEREOF, IRONSHORE INDEMNITY INC. has caused this instrument to be signed by its Director, and its Corporate Seal to be affixed this 2nd day of July, 2013.

IRONSHORE INDEMNITY INC.



By: [Signature]
Daniel L. Sussman
Director

ACKNOWLEDGEMENT

On this 2nd day of July, 2013, before me, personally came Daniel L. Sussman to me known, who being duly sworn, did depose and say that he is the Director of Ironshore Indemnity Inc., the corporation described in and which executed the above instrument; that he executed said instrument on behalf of the corporation by authority of his office under the By-laws of said corporation.

AMY L. TAYLOR
Notary Public - State of Tennessee
Davidson County
My Commission Expires 01-01-16



[Signature]
Amy L. Taylor
Notary Public

CERTIFICATE

I, the undersigned, Secretary of IRONSHORE INDEMNITY INC., a Minnesota Company, DO HEREBY CERTIFY that the original Power of Attorney of which the foregoing is a true and correct copy, is in full force and effect and has not been revoked and the resolutions as set forth are now in force.

Signed and Sealed at this 11th Day of December, 2014.



[Signature]
Paul S. Giordano
Secretary

"WARNING: Any person who knowingly and with intent to defraud any insurance company or other person, files and application for insurance or statement of claim containing any materially false information, or conceals for the purpose of misleading information concerning any fact material thereto, commits a fraudulent insurance act, which is a crime and subjects such person to criminal and civil penalties."

IN THE SUPREME COURT OF ALABAMA

SECURUS TECHNOLOGIES, INC.,
a Corporation,

Appellant,

v.

ALABAMA PUBLIC SERVICE COMMISSION,

Appellee.

CASE NO. _____

On Appeal from the
Alabama Public
Service Commission

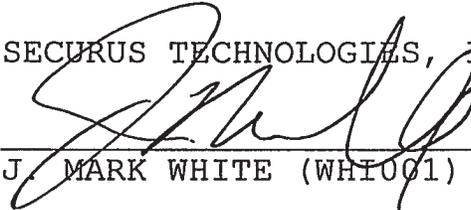
NOTICE OF APPEAL

Pursuant to Ala. Code §37-1-140, notice is hereby given that Securus Technologies, Inc., appeals to the Supreme Court of Alabama from the Order entered on December 9, 2014 by the Alabama Public Service Commission in the foregoing cause, which involves a controversy respecting rates and charges of a telephone company.

Respectfully submitted this 16th day of December, 2014,

SECURUS TECHNOLOGIES, INC.

BY:

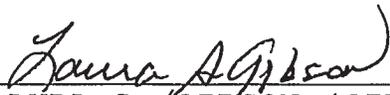

MARK WHITE (WHI001)


AUGUSTA S. DOWD (DOW003)


THOMAS E. WALKER (WAL017)

FILED
DEC 16 2014
COURT OF
CIVIL APPEALS

FILED
DEC 16 2014
CLERK
SUPREME COURT OF ALABAMA



LAURA S. GIBSON (GIB024)

Attorneys for Securus Technologies, Inc.
WHITE ARNOLD & DOWD P.C.
2025 Third Avenue North, Ste. 500
Birmingham, AL 35203
(205) 323-1888
(205) 323-8907

BEFORE THE
ALABAMA PUBLIC SERVICE COMMISSION

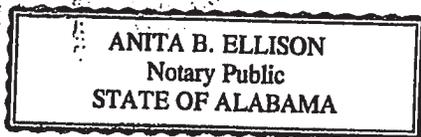
RE: GENERIC PROCEEDING)
CONSIDERING THE PROMULGATION) DOCKET 15957
OF TELEPHONE RULES GOVERNING)
INMATE PHONE SERVICES)

Security for Costs

We hereby acknowledge ourselves for security for costs of appeal. For the payment of all costs secured by this undertaking, we hereby waive our right of exemption as to personal property under the Constitution and the laws of the State of Alabama.

Executed with our seals this 16th day of December,
2014.

Anita B. Ellison



SECURUS TECHNOLOGIES, INC.

[Signature]

Appellant - Principal

J. MARK WHITE

As its: Attorney

[Signature] (L.S.)
Surety

[Signature] (L.S.)
Surety

Filed and Approved:

Date:

[Signature]

By:

12/16/14

IN THE SUPREME COURT OF ALABAMA

FILED
DEC 16 2014
COURT OF
CIVIL APPEALS

SECURUS TECHNOLOGIES, INC.,)
a Corporation,)
Appellant,)

CASE NO. _____

FILED)
DEC 16 2014)
CLERK)
SUPREME COURT OF ALABAMA)

On Appeal from the
Alabama Public
Service Commission

v.)
ALABAMA PUBLIC SERVICE COMMISSION,)
Appellee.)

APPLICATION FOR SUPERSEDEAS AND ORDER THEREON

To the Supreme Court of Alabama and the Honorable Justices,
thereof:

Securus Technologies, Inc., Appellant in the above-titled cause ("Securus"), pursuant to Title 37, Chapter 1, Division 3 of the Alabama Code, and, more specifically, pursuant to Sections 37-1-141 and 37-1-125 through 37-1-130, inclusive, applies to this Honorable Court to stay or supersede the order of the Alabama Public Service Commission, ("APSC") made and entered on December 9, 2014, in the underlying proceeding, ("APSC Order") involving a controversy concerning its rates and charges as a telephone company, from which an appeal is taken to this Court until the final disposition of this appeal.

Securus avers that the APSC Order is contrary to the statutory authority and jurisdiction of the APSC, is unlawful

and void, and is based on findings of fact contrary to the substantial weight of the evidence. Securus further avers that the APSC erred in its application of the law to the prejudice of the substantial rights of Securus.

As further grounds for this appeal, Securus avers that portions of the APSC Order are unlawful and void for the following additional reasons:

(1) The APSC Order exceeds both the regulatory authority held by APSC and what is otherwise necessary for APSC to achieve its objectives;

(2) The APSC Order interferes with and regulates contractual relationships between Securus and third parties where APSC lacks jurisdiction to do so;

(3) The APSC Order unlawfully extends APSC's jurisdiction over financial transactions carried out by third parties who are outside the control of Securus and are not subject to APSC authority;

(4) The APSC Order is contrary to the great weight of the evidence and is arbitrary and capricious in that it adopts a \$0.30 per minute rate cap but also allows for the payment by inmate calling service providers of unlimited site commissions. The failure of the APSC Order to cap site

commissions or allow adjustments to inmate calling rates to accommodate payment of unrestricted commissions creates a capricious, unpredictable, and possibly confiscatory result in violation of the Fifth and Fourteenth Amendments of the United States Constitution and of Sections Six and Thirteen of the Alabama Constitution; and

(5) The APSC Order exerts regulatory jurisdiction over inmate calling service in a number of areas, including video, wireless and internet protocol-based services, which services the APSC lacks jurisdiction to regulate under Alabama law.

Securus further avers that unless the APSC Order is stayed or superseded pending final adjudication or determination of the issues involved in this proceeding, Securus will be required by the APSC Order to charge and collect for its services in Alabama an unlawful, inadequate, unjust, and unreasonable rate, and will suffer significant and irreparable harm.

Appellant further shows this Honorable Court that no injury, loss, or inconvenience will result to the APSC if, pending the final determination of this cause on appeal, the APSC Order is stayed or superseded and Securus is allowed to retain its current schedule of rates and charges because, in

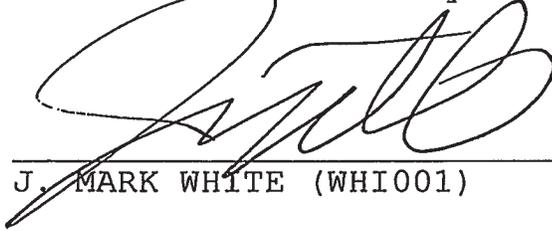
the event of a final determination by this Court that the APSC Order is valid, Securus will refund to any customer any overcharge due the customer in accordance with the final ruling by this Court.

Securus estimates that the approximate amount by which its gross revenues would be decreased by the APSC Order for a period of six months will be \$242,500.

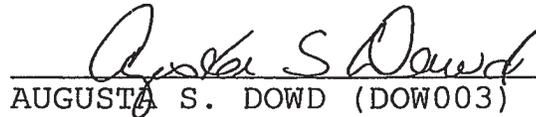
Accordingly Securus, now tenders to this Honorable Court and is ready to make and file a good and sufficient bond, conditioned as required by law in double the amount estimated by which Securus' revenues will be decreased during said period by reason of the decreased rates and charges ordered by APSC Order, and conditioned to pay all such loss or damages as any person, firm, or corporation may sustain (including all such excess rates, fares or charges as any such person, firm, or corporation may have paid during said period of time), pending this appeal in the event the APSC Order shall be sustained.

WHEREFORE, Securus prays that said bond be accepted and approved and that this Honorable Court direct that the APSC Order be stayed or superseded in accordance with Ala. Code §37-1-130.

Respectfully submitted this 16th day of December, 2014,



J. MARK WHITE (WHI001)



AUGUSTA S. DOWD (DOW003)



THOMAS E. WALKER (WAL017)



LAURA S. GIBSON (GIB024)

Attorneys for Securus Technologies, Inc.
WHITE ARNOLD & DOWD P.C.
2025 Third Avenue North, Ste. 500
Birmingham, AL 35203
(205) 323-1888

STATE OF TEXAS)

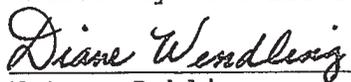
AFFIDAVIT

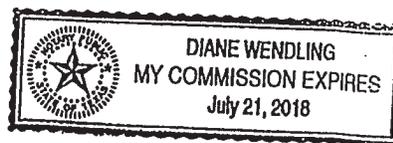
COUNTY OF Dallas)

Before me a Notary Public, in and for said county and state, personally appeared Curtis L. Hopfinger, who being duly sworn, deposes and says: That he is the Director-Regulatory and Government Affairs of Securus Technologies, Inc. and is cognizant of the facts stated in the forgoing application; that he is authorized to make this affidavit on behalf of Securus Technologies, Inc.; and that the statements contained therein concerning the estimated amount by which the gross revenues of Securus Technologies, Inc. will be decreased during the period January 8, 2015 through June 8, 2015, inclusive, by reason of the decreased rates and unlimited facility site commissions sought to be made effective by the Alabama Public Service Commission pursuant to and by virtue of its order of December 9, 2014 are true and correct to the best of his information, knowledge and belief.


 CURTIS L. HOPFINGER

Subscribed and sworn to before me this 9th day of December, 2014, as witness my hand and official seal.


 Notary Public
 My commission Expires: July 21, 2018



Security for Costs

We hereby acknowledge ourselves for security for costs of appeal. For the payment of all costs secured by this undertaking, we hereby waive our right of exemption as to personal property under the Constitution and the laws of the State of Alabama.

Executed with our seals this 16th day of December, 2014.

SECURUS TECHNOLOGIES, INC.

Anita B. Ellison

ANITA B. ELLISON
Notary Public
STATE OF ALABAMA

J. Mark White

Appellant - Principal
J. MARK WHITE (WHI001)
As its: Attorney

Angela S. Powell (L.S.)
Surety

Laura S. Gibson (L.S.)
Surety

Filed and Approved:

Date: _____

By: _____

GTL

IN THE SUPREME COURT OF ALABAMA

GLOBAL TEL*LINK CORPORATION,)
BY AND ON BEHALF OF ITSELF AND)
ITS WHOLLY OWNED)
SUBSIDIARIES, DSI-ITI, LLC; PUBLIC)
COMMUNICATIONS SERVICES, INC.;)
and VALUE-ADDED)
COMMUNICATIONS, INC.;)
Appellants/Petitioners,)
v.)
ALABAMA PUBLIC SERVICE)
COMMISSION,)
Defendant/Appellee.)

CASE NO.: _____
ON APPEAL FROM THE
ALABAMA PUBLIC SERVICE
COMMISSION,
Docket 15957



APPLICATION FOR SUPERSEDEAS AND ORDER THEREON

To the Alabama Supreme Court:

GLOBAL TEL*LINK CORPORATION, by and on behalf of itself and its wholly owned subsidiaries, DSI-ITI, LLC; PUBLIC COMMUNICATIONS SERVICES, INC; and VALUE-ADDED COMMUNICATIONS, INC. (hereafter collectively referred to as "GTL"), Appellants/Petitioners in the above-titled cause, pursuant to Title 37, Chapter 1 of the ALABAMA CODE and, more specifically, pursuant to §§ 37-1-140 and 37-1-141, inclusive, apply to this Honorable Court to stay or supersede the order of the Alabama Public Service Commission ("PSC") made and entered on December 9, 2014, in the underlying proceeding, ("PSC order"), from which an appeal is taken to this Court, until the final disposition of this appeal.

GTL avers that the Commission erred to the prejudice of GTL's substantial rights in its application of the law, and that the order is based upon facts contrary to the substantial weight of the

evidence.

As further grounds for this appeal, GTL avers that the PSC order is unlawful and void for the following reasons:

1. The PSC order exceeds both the regulatory authority held by PSC and what is otherwise necessary for PSC to achieve its objectives. For example:
 - a. The PSC order imposes certain reporting and tariff requirements on services that are not regulated at the state level, including video, wireless and Internet Protocol-based services. Alabama law prohibits the PSC from exercising jurisdiction over “any aspect of broadband service, broadband enabled services, [Voice Over Internet Protocol] services, or information services” regardless of the entity providing such services and “[n]otwithstanding any provision of law to the contrary.” ALA. CODE § 37-2A-4(a);
 - b. The PSC order regulates billing and collections services which are outside the PSC’s jurisdiction. See Long Distance Telephone Litigation, 783 So. 2d 800, 803 (Ala. 2000) (finding a company “that merely provides billing and collections services” is not a utility as defined under Alabama statutes, and is not within the PSC’s jurisdiction.).
2. The PSC order interferes with and regulates contractual relationships between GTL and third parties where PSC lacks jurisdiction to do so. For example:
 - a. The PSC order unlawfully attempts to extend the PSC’s jurisdiction over financial transactions carried out by third parties who are outside the control of GTL, and are undisputably not subject to the PSC’s authority.

3. The PSC order is contrary to the substantial weight of the evidence and is arbitrary and capricious, especially with respect to the order's new requirements regarding payment limits, minimum funding requirements, allowable calling lists, tariffs, and record keeping and reporting.

4. The PSC order creates a capricious, unpredictable, and possibly confiscatory result in violation of the Fifth and Fourteenth Amendments of the United States Constitution and of Sections Six and Thirteen of the Alabama Constitution. For example:

- a. The PSC order adopts a \$0.30 per minute rate cap, but also allows for the payment by inmate calling service providers of unlimited site commissions. The PSC's failure to cap site commissions or allow adjustments to inmate calling rates to accommodate payment of site commissions results in a takings/due process violation;
- b. The PSC order's new requirements on the issuance of refunds and the application of the Alabama Uniform Disposition of Property Act results in a due process/takings violation.

5. The PSC order operates as an ex post facto law and violates Section 22 of the Alabama Constitution by "impairing the obligation of contracts." For example:

- a. The PSC specified that "agreements between providers and correctional facilities do not supersede [its] authority over rates and services." Thus, the PSC's new requirements must be implemented regardless of whether there is a change of law provision in any inmate calling service provider's contract.

6. The PSC order interferes with GTL's contractual and property rights by requiring GTL to immediately abide by, and comply with, regulations therein regulating and revising charges,

7

fees, and costs that are the subject of existing contracts between GTL and third parties, while the PSC has likewise observed that the Federal Communications Commission may exercise pre-emptive jurisdiction and assert federal authority over all intrastate inmate calling service matters and otherwise make dramatic changes across the board applicable to GTL. Consequently, the PSC order destroys all finality with regard to GTL's contractual relationships and subjects such contractual relationships to continuing uncertainty ahead of pre-emptive regulation by the Federal Communications Commission, all resulting in a financial loss and destruction of property rights belonging to GTL.

GTL further avers that unless the PSC order is stayed or superseded pending final adjudication or determination of the issues involved in this proceeding, GTL will be required by the PSC order to charge and collect for its services in Alabama an unlawful, inadequate, unjust, and unreasonable rate, and will suffer significant and irreparable harm.

GTL further shows this Honorable Court that no injury, loss, or inconvenience will result to the PSC if, pending the final determination of this cause on appeal, the PSC order is stayed or superseded, and GTL is allowed to retain its current schedule of rates and charges because, in the event of a final determination by this Court that the PSC order is valid, GTL will refund to any customer any overcharge due the customer in accordance with the final ruling by this Court.

GTL estimates that the approximate amount by which its gross revenues would be decreased by the PSC order for a period of six months will be \$100,000.00.

Accordingly, GTL now tenders to this Honorable Court and is ready to make and file a good and sufficient bond, conditioned as required by law in double the amount estimated by which GTL's revenues will be decreased during said period by reason of the decreased rates and charges ordered

by PSC order , and conditioned to pay all such loss or damages as any person, firm, or corporation may sustain (including all such excess rates, fares or charges as any such person, firm, or corporation may have paid during said period of time), pending this appeal in the event the PSC order shall be sustained.

WHEREFORE, GTL prays that said bond be accepted and approved and that this Honorable Court direct that the PSC order be stayed or superseded in accordance with ALA. CODE § 37-1-141.

Respectfully submitted on December 19, 2014.

/s/ J. Flynn Mozingo
JOE ESPY, III (ESP002)
J. FLYNN MOZINGO (MOZ003)
BENJAMIN J. ESPY (ESP005)
Attorneys for Appellants/Petitioners,
GLOBAL TEL*LINK CORPORATION

OF COUNSEL:

Melton, Espy & Williams, P.C.
Post Office Drawer 5130
Montgomery, AL 36103-5130
Telephone: (334) 263-6621
Facsimile: (334) 263-7252
jespy@mewlegal.com
fmozingo@mewlegal.com
bespy@mewlegal.com

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing has been electronically filed on December 19, 2014, with the Clerk of the Court using the ACIS filing system, and that a copy of same will be served upon the below listed party via United States Postal Service, properly addressed and postage prepaid:

Walter L. Thomas, Jr., Secretary
Alabama Public Service Commission
Post Office Box 304260
Montgomery, AL 36130

/s/ J. Flynn Mozingo

OF COUNSEL

IN THE SUPREME COURT OF ALABAMA

GLOBAL TEL*LINK CORPORATION,)	
)	
Plaintiff/Appellant,)	CASE NO.: _____
)	
v.)	ON APPEAL FROM THE
)	ALABAMA PUBLIC SERVICE
ALABAMA PUBLIC SERVICE)	COMMISSION,
COMMISSION,)	
)	Docket 15957
Defendant/Appellee.)	

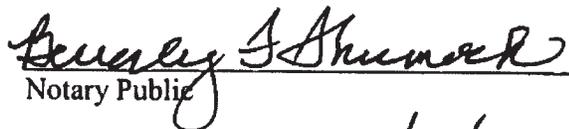
AFFIDAVIT

STATE OF Alabama)
COUNTY OF Mobile)

Before me a Notary Public, in and for said county and state, personally appeared Charles Stephen Yow, who being duly sworn, deposes and says: That he is the Chief Financial Officer and Treasurer of Global Tel*Link Corporation. In this capacity he is authorized to act on behalf of Global Tel*Link Corporation and its wholly owned subsidiaries that also provide inmate calling services, DSI-ITI, LLC, Public Communications Services, Inc., and Value-Added Communications, Inc. (collectively, "GTL"); that he is cognizant of the facts stated in the forgoing application; that he is authorized to make this affidavit on behalf of GTL; that the estimated amount by which the gross revenues of GTL will be decreased during the period January 8, 2014 through June 8, 2015, inclusive, by reason of the decreased rates and unlimited site commissions sought to be made effective by the Alabama Public Service Commission pursuant to and by virtue of its order of December 9, 2014 will be \$100,000; and that the statements in the foregoing application are true and correct to the best of his information, knowledge and belief.


CHARLES STEPHEN YOW

Subscribed and sworn to before me
this 19th day of December, 2014, as
witness my hand and official seal.


Notary Public

My commission Expires: 09/30/2017

Form ARAP-1 (front) Rev.1/97

NOTICE OF APPEAL TO THE (Check appropriate block)
 SUPREME COURT OF ALABAMA
 COURT OF CIVIL APPEALS OF ALABAMA

Civil Action Number: _____

IN THE _____ COURT OF _____ COUNTY, ALABAMA

APPELLANT Global Tel*Link Corporation, by and on behalf of itself and its wholly owned subsidiaries, DSI-ITI, LLC; Public Communications Services, Inc.; and Value-Added Communications, Inc.

V. APPELLEE Alabama Public Service Commission

TRIAL JUDGE N/A

DATE OF JUDGMENT: December 9, 2014 **DATE OF POST – JUDGMENT ORDER:** _____

NOTICE IS HEREBY GIVEN THAT Global Tel*Link Corporation, et al. appeal(s) to the above-named court from the Final Judgment Order Adopting Revised Inmate Phone Service Rules entered in this cause. (describing it)

CHECK THE PROPER DESCRIPTION OF THE APPEALED CASE UNDER THE APPROPRIATE COURT:

- SUPREME COURT**
- 1. Summary Judgment, amount claimed more than \$ 50,000
 - 2. Judgment Amount exceeds \$50,000
 - 3. Amount Sought in trial court more than \$50,000, Judgment for defendant
 - 4. Equitable Relief, except for domestic relations
 - 5. Other: appeal from Alabama Public Service Commission

- COURT OF CIVIL APPEALS**
- 1. Summary Judgment, amount claimed \$ 50,000 or less
 - 2. Judgment Amount \$50,000 or less
 - 3. Amount Sought \$50,000 or less, judgment for defendant
 - 4. Workmen's Compensation
 - 5. Domestic Relations
 - 6. Other: _____

APPELLANT FILES WITH THIS NOTICE OF APPEAL:

- 1. Security for costs of appeal
- 2. A supersedeas bond in the amount of \$ _____
- 3. Deposited cash security in the amount of \$ _____

- 4. Is exempted by law from giving security for costs of appeal by virtue of _____

Filed 12/19/2014
(Date)

Post Office Drawer 5130
Address
Montgomery, AL 36103 (334) 263-6621
Telephone Number

CERTIFIED AS A TRUE COPY

Circuit Clerk

J. Flynn Mozingo
Appellant or Attorney for Appellant
Email fmozingo@mewlegal.com

SECURITY FOR COSTS

We hereby acknowledge ourselves security for costs of appeal. For the payment of all costs secured by this undertaking, we hereby waive our right of exemption as to personal property under the Constitution and laws of the State of Alabama.

Executed with our seals this 19th day of December, 2014

Filed and approved: _____ (Date) Global Tel*Link Corporation, et al. (L.S.)
Appellant-principal

Surety s/ Joe Espy, III (L.S.)

Surety s/ J. Flynn Mozingo (L.S.)

Circuit Clerk
(Amended November 9, 1976; October 1, 1991.)

SUPERSEDEAS BOND

We, the undersigned principal and sureties, hereby acknowledge ourselves bound unto _____ Dollars, for the payment of which we bind ourselves, and each other, our heirs, executors, [(for amount of bond see Rule 8(a) and administrators, jointly and severally, and as part of this undertaking we hereby waive our rights of exemption as to personal property under the Constitution and laws of the State of Alabama.

WHEREAS, the above-named appellee (s) recovered a judgment against appellant (s) for the sum of _____ Dollars (and the further acts or duty _____) [describing judgment in addition to or other than for money only] _____ Dollars, the costs in that behalf expended.

NOW, therefore, the condition of the foregoing obligation is such that, if the appellant shall prosecute this appeal to effect, and satisfy such judgment, penalties, and costs including costs of appeal as may be rendered in this case, then the said obligation to be null and void, otherwise to remain in full force and effect.

Executed with our seals this _____ day of _____, _____.

Filed and approved: _____
(Date)

Appellant-principal _____ (L.S.)

Surety _____ (L.S.)

Circuit Clerk _____
Surety _____ (L.S.)

EXECUTION OF JUDGMENT STAYED:

Bond fixed at: \$ _____
(Not required for money judgment only.)

Circuit Judge _____ (L.S.)

DESIGNATION OF RECORD ON APPEAL

DESIGNATION OF CLERK'S RECORD: Appellant requests the clerk to include the following checked materials in the clerk's record:

1. Complaint
2. Answer
3. Counter-claim
4. Cross-Claim
5. Third-party Complaint
6. Third-party Answer
7. Motion to dismiss
8. Pretrial order

9. Entire record (less those items set forth in Rule 10 (a))
10. Motion for summary judgment
11. Opposition to motion for summary judgment
12. Final (Judgment) (Order)
13. Motion for New Trial
14. Ruling on Motion
15. Others: _____
16. Exhibit Number: _____

TRANSCRIPT STATUS

- Transcript will not be ordered. [See Rule 10(b), ARAP.]
 Transcript will be ordered. [See Rules 10(b)(2) and 11 (a)(2), ARAP.
 Form 1A or 1B.] Court reporter(s): _____

NOTE: If more than one court reporter was involved in this case, you must file a Transcript Purchase Order Form in compliance with Rules 10(b) and 11(c), Form 1A or 1B of the ARAP, for each court reporter.
(Amended October 1, 1991.)

CERTIFICATE OF FILING

I certify that I have this date filed with the clerk of the trial court the original and 2 copies of the foregoing notice of appeal (along with \$ 200 docket fee), and such other instruments as have been completed and included herein. A true copy of each of these items will be served by the clerk of the trial court on each of the following:

- 1) Clerk of the appellate court, (the \$ 200 docket fee shall be transmitted with this filing) or affidavit of hardship.
- 2) Court Reporter.
- 3) Counsel for appellee, or appellee if no counsel.

Name: Walter L. Thomas, Jr., Secretary; Alabama Public Service Commission
 Address: Post Office Box 304260; Montgomery, AL 36130

DATED this 19th day of December, 2014.

s/ J. Flynn Mozingo
 Attorney for Appellant

(Amended October 1, 1991.)

BEFORE THE ALABAMA
PUBLIC SERVICE COMMISSION

RE: GENERIC PROCEEDINGS)
CONSIDERING THE)
PROMULGATION OF) DOCKET 15957
TELEPHONE RULES)
GOVERNING INMATE PHONE)
SERVICE)

SECURITY FOR COSTS

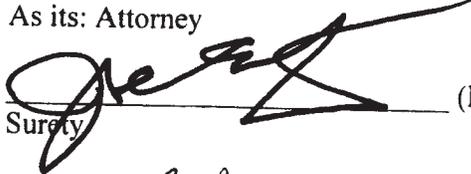
We hereby acknowledge ourselves for security for costs of appeal. For the payment of all costs secured by this undertaking, we hereby waive our right of exemption as to personal property under the Constitution and the laws of the State of Alabama.

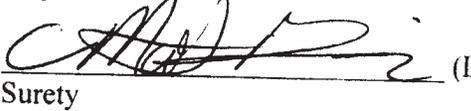
Executed with our seals this 18th day of December, 2014.

GLOBAL TEL*LINK CORPORATION, by and on behalf of itself and its wholly owned subsidiaries, DSI-ITI, LLC; PUBLIC COMMUNICATIONS SERVICES, INC; and VALUE-ADDED COMMUNICATIONS, INC.

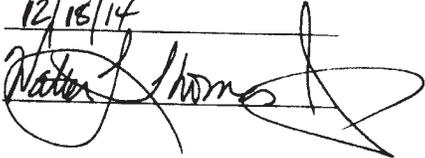

Appellant / Principal
J. FLYNN MOZINGO

As its: Attorney

 (L.S.)
Surety

 (L.S.)
Surety

Filed and Approved:

Date: 12/18/14
By: 

Honorable Julia Jordan Weller
State of Alabama Court
Unified Judicial System

Form ARAP-24 (front) 1/97

DOCKETING STATEMENT
Appeal to the Supreme Court of Alabama
NOTE: completed Civil Case Cover Sheet must be attached

Appellate Case Number
(to be filled in by appellate court)

COUNTY CIVIL ACTION NUMBER TRIAL JUDGE

I. **PARTY/ PARTIES FILING**
APPEAL (Appellant) : Global Tel*Link Corporation, et al. (see attached)
APPELLANT'S ATTORNEY: J. Flynn Mozingo (334) 263-6621
 Post Office Drawer 5130 Montgomery AL Telephone Number 36103
Address City State Zip Code

II. **PARTY/ PARTIES APPEALED**
APPEAL (Appellee) : Alabama Public Service Commission
APPELLEE'S ATTORNEY: ()
 Post Office Box 304260 Montgomery AL Telephone Number 36130
Address City State Zip Code

III. **APPELLANT IS THE TRIAL COURT:** Plaintiff Defendant Other
 IV. **IS THIS A CROSS-APPEAL?** Yes No

V. **RELIEF AWARDED/REQUESTED:** please check the appropriate block (s):
 A. Monetary damages were either sought or awarded, as set out below:
 1. Compensatory damages were: (a) awarded in the amount of \$ _____;
 (b) not awarded, but sought in the amount of \$ _____;
 (c) sought, but not awarded - the amount sought was not specified in the complaint.
 2. Punitive damages were: (a) awarded in the amount of \$ _____;
 (b) not awarded, but sought in the amount of \$ _____;
 (c) sought, but not awarded - the amount sought was not specified in the complaint.
 3. A general award of damages (not differentiating between compensatory and punitive) was: (a) made in the amount of \$ _____;
 (b) not made, but sought in the amount of \$ _____;
 (c) sought, but not made - the amount sought was not specified in the complaint.
 4. Other monetary damages (Type: _____) were: (a) awarded in the amount of \$ _____;
 (b) not awarded, but sought in the amount of \$ _____;
 (c) sought, but not awarded - the amount sought was not specified in the complaint.
 5. Was there a remittitur or additur at issue in the trial court? Yes No
 (if yes, please provide the details in the "FACTS" section on the back of this form)
 B. Equitable and/or declaratory relief was sought in the trial court
 C. Other
 (Please provide in the details of the issue(s) before the Court in the "ISSUES" section on the back of this form.)

VI. **TYPE OF JUDGMENT OR ORDER APPEALED.** (Please check one) :
 A Judgment based on a jury Verdict D Order granting a New Trial G Dismissal
 B Judgment based on a Non-jury Decision E Judgment as a Matter of Law H Default Judgment
 C Judgment Notwithstanding the Verdict (JNOV) F Summary Judgment I Other

VII. **IF THE CASE WENT TO TRIAL, HOW MANY DAYS DID THE TRIAL TAKE?** N/A

VIII. **FINALITY OF JUDGMENT:** Date of entry of judgment or order appealed from: December 9 2014
Month Day Year
 1. Is the judgment or order appealed from in compliance with rule 58, A.R.Civ.P.? Yes No
 2. Does the order appealed from constitute a disposition of all claims as to all parties? Yes No
 3. If not, did the trial court enter an order intended to make the order final pursuant to rule 54(b)? Yes No
 4. If the trial court intended to make the order appealed from final pursuant to rule 54 (b), did the court in the Rule 54 (b) order expressly determine that there was no just reason for delay and expressly direct that final judgment be entered? Yes No
 5. If the answer to question 2 is "NO", and the trial court did not make the order final by full compliance with Rule 54(b), please explain the basis for seeking appellate review and cite the authority for this appeal:
 The order is a ruling on rates and charges by the Public Service Commission. Thus, part VIII is inapplicable thereto.

IX. **POST-JUDGMENT MOTIONS:** List all post-judgment motions by date of filing, type, and date of disposition (whether by trial court order or by the provisions of Rule 59.1, A.R.Civ.P.):

DATE OF FILING			TYPE OF POST-JUDGMENT MOTION	DATE OF DISPOSITION		
Month	Date	Year		Month	Date	Year
			N/A			

X. CONSTITUTIONAL ISSUES:

1. Are the provisions of Rule 44, A.R.App.P., applicable to this appeal?
 2. If so, have the provisions been complied with?

Yes No
 Yes No

XI. NATURE OF CASE ON APPEAL: In the left column of boxes proceeding the categories listed below, check the box (check only one) that best describes or categorizes the basis or theory of the primary issue on appeal. In the right column of boxes, check any secondary theories that are applicable to the suit.

TORTS:

- 01 Bad Faith
 02 Fraud
 03 Legal Malpractice
 04 Medical Malpractice
 05 Other Malpractice
 06 Products/AEMLD
 07 Negligence (Vehicular)
 08 Negligence (Gen./other)
 09 Personal Property

- 10 Real property
 11 Wrongful Death (All Types)
 12 Wantonness
 13 Conversion
 14 Wrongful Employ Termination
 15 Premises Liability
 16 Outrage
 29 Other: _____

CONTRACTS

- 30 Commercial

- 31 Personal
 32 Pension
 33 Insurance
 34 Employment
 39 Other: _____

OTHER:

- 40 Real Property
 41 Civ Rights (Prisoner)
 42 Civil Rights (Other)
 43 Wills/Trusts/ Estates

- 44 Declaratory judgment
 45 Injunction (Commercial)
 46 Injunction (Employment)
 47 Injunction (Other)
 48 Extraordinary Writ
 49 Pub. Service Comm
 50 RR/Seaman(FELA)
 51 RICO
 99 Other: Appeal per

Ala. Code § 37-1-140

XII. APPELLATE REVIEW: Please take notice that your case may be initially reviewed by the Court of Civil Appeals. Pursuant to § 12-2-7, Code of Alabama 1975, the Supreme Court has the authority to transfer any civil case within its jurisdiction to the court of Civil Appeals, except cases presenting a substantial question of federal or state constitutional law; cases involving a novel legal question, the resolution of which will have significant statewide impact; utility rate cases appealed pursuant to § 31-1-140, Code of Alabama 1975, bond validation cases appealed pursuant to § 6-6-754, Code of Alabama 1975, or Alabama State bar disciplinary proceedings.

If you believe this case should not be transferred to the Court of Civil Appeals, please state with specificity the reason(s) why it should not be transferred, referring to pertinent sections of § 12-2-7. Reasons should be supported in the ISSUES and FACTS sections of this docketing statement.

This is an appeal of a utility rate case directly appealable to the Supreme Court under Ala. Code § 37-1-140.

XIII. ISSUES: Briefly summarize the issue(s) on appeal.

See attached.

XIV. FACTS: without argument, briefly summarize the facts to inform the court of the nature of the case.

See attached.

December 19, 2014

Date

s/ J. Flynn Mozingo

Signature of Attorney/Party Filing this Form

Attachment to Docketing Statement

XIII. ISSUES.

Whether the Public Service Commission order regulating rates and charges applicable to Appellant is an erroneous application of the law prejudicial to the Appellant's substantial rights and economic interests; is contrary to the substantial weight of the evidence; and is otherwise arbitrary and capricious; entered without authority or in excess of authority; constitutes a taking or confiscation of the Appellant's contractual and property rights in violation of the Constitution of the United States and the Alabama Constitution; arbitrarily and capriciously interferes with Appellant's contractual rights with third parties who are not subject to oversight by the Public Service Commission; and regulates matter pre-empted by, or within, the exclusive jurisdiction of the Federal Communications Commission.

XIV. FACTS.

On December 9, 2014, the Alabama Public Service Commission issued a lengthy order, numbering ninety-two pages excluding appendices, that promulgates and regulates rates and charges applicable to inmate phone services. The order seeks to impose new or revised rates; exclude the Appellant from charging certain existing fees and rates that are currently the subject of contracts with third parties who are not subject to oversight by the Public Service Commission; will result in a taking and confiscation of the Appellant's contractual rights; interfere with Appellant's contractual relations with third parties; and seeks to regulate activities and conduct already subject to the exclusive regulation or oversight of the Federal Communications Commission.