

**BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, DC 20554**

In the Matter of)
)
NTCH, Inc.,)
)
Complainant)
)
v.)
)
Cellco Partnership d/b/a Verizon Wireless)
)
Defendant)

File No. EB-13-MD-006

REQUEST FOR ADDITIONAL TIME TO FILE SUPPLEMENTAL DISCOVERY

NTCH, Inc., (“NTCH”) hereby respectfully requests additional time in which to prepare and file supplemental discovery requests in the above-captioned proceeding. In its letter ruling on the first round of discovery in this proceeding, the Staff set May 7 as the deadline for submitting supplemental discovery requests. This date was ten (10) business days after the date of the submission of answers to the first round of discovery requests, April 27.

Because the Staff is reviewing the proposed Protective Order submitted by the Parties, NTCH still has not received the full, unredacted set of answers from Cellco Partnership d/b/a Verizon Wireless (“Verizon”) and has therefore been unable to review them and determine whether supplemental discovery requests will be required¹ Given the delay in submission to NTCH of the unredacted responses, maintaining the May 7 deadline, when nearly half the time for the review of the initial round of discovery responses has already passed without NTCH being able to review those responses, would unfairly limit its ability to draft supplemental discovery requests, if necessary.

¹ In order to facilitate the more rapid resolution of this proceeding, NTCH has provided a copy of its unredacted interrogatory responses to Verizon, pending the issuance of the Protective Order.

Therefore, NTCH respectfully requests that the deadline for the submission of supplemental discovery requests be extended to a date ten (10) business days after the issuance of a final Protective Order in this matter.

Respectfully Submitted,



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April 30, 2014

CERTIFICATE OF SERVICE

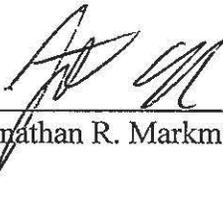
I, Jonathan R. Markman, do certify that I sent the foregoing Challenge to Verizon
Discovery Designation to be delivered, on this 30th day of April, 2015, via email to:

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By: _____



Jonathan R. Markman