

August 7, 2015

**VIA E-MAIL**

Linda Oliver, Esq.  
Administrative Law Division  
Federal Communications Commission  
445 12th Street, SW  
Washington, D.C. 20554

**Re: EB Docket 11-71**

Dear Ms. Oliver:

By letter of August 5, 2015, I informed you that we had been retained by Mr. Havens the prior day to represent Environmental LLC, Verde Systems LLC, Telesaurus Holdings GB LLC, Intelligent Transportation & Monitoring Wireless LLC, V2G LLC and Skybridge Spectrum Foundation, as well as Mr. Havens personally in the above-referenced matter. In that letter, I requested permission to file a supplemental appeal of the Judge Sippel Order 40 days from the date a decision is made to grant this request, on behalf of our above-named clients, to permit us to adequately represent the interests of our clients. We filed a Notice of Appearance that same day. Both items were served on all parties to EB Docket 11-71.

I note in connection with my letter request that, as you know, Chadbourne & Parke LLP withdrew earlier today from its representation of Environmental LLC and Verde Systems LLC.

In my August 5 letter to you, I pointed out the difficulty of mastering the complex facts<sup>1</sup> that have been amassed and litigated in a large, dense record of pleadings and hearings over a four-plus-years-long proceeding.

The purpose of this letter is to reiterate my request for sufficient time to prepare to represent our clients adequately, especially in light of the fact that neither we, because we are new to the matter, nor Chadbourne & Park, because it has withdrawn, will be making the filing otherwise due today. The Memorandum Opinion and Order, FCC 15M-14 (Apr. 22, 2015) by Chief

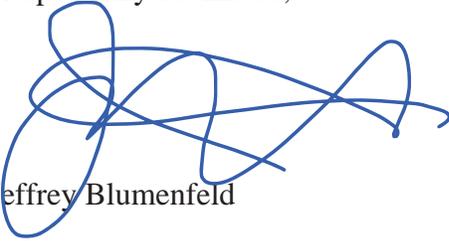
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<sup>1</sup> A preliminary review of the Docket suggests that we will also have to master a complex procedural history. As one example, we will be working to understand the procedures under which, it appears, there is an appeal pending of an Order as to which there is pending a Motion for Reconsideration.

Administrative Judge Richard L. Sippel (“Judge Sippel Order”) on its face not only denies all of our clients their right to participate further in the Docket but also refers to the Commission a question of qualification which the Order suggests could affect our clients’ further right to hold any FCC-issued licenses. Fundamental fairness should require that our clients have the right to protest that Order and otherwise participate, in all appropriate *fora*, by their chosen counsel.

We respectfully ask once more that you grant our request so that we may adequately represent our clients and ensure that their positions are fully and fairly presented.

Respectfully submitted,

A handwritten signature in blue ink, consisting of several overlapping loops and a long horizontal stroke extending to the right.

Jeffrey Blumenfeld

## CERTIFICATE OF SERVICE

The undersigned, an attorney at Lowenstein Sandler LLP, hereby certifies that on this day, August 7, 2015, a copy of the foregoing letter was filed with the Commission, served on the parties listed below via First Class United States Mail, and a courtesy copy was provided via electronic email.

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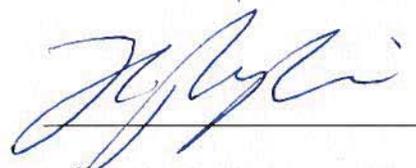
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Date: August 7, 2015



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