

CONNECTICUT SITING COUNCIL

APPLICATION OF CELLCO PARTNERSHIP)	
d/b/a VERIZON WIRELESS TO THE)	DOCKET NO. 448
CONNECTICUT SITING COUNCIL FOR A)	
CERTIFICATE OF ENVIRONMENTAL)	JULY 21, 2014
COMPATIBILITY AND PUBLIC NEED)	
FOR THE CONSTRUCTION MAINTENANCE)	
AND OPERATION OF A TELE-)	
COMMUNICATIONS FACILITY LOCATED)	
AT ORANGE TAX ASSESSOR MAP 77,)	
BLOCK 3, LOT 1, 831 DERBY MILFORD)	
ROAD, ORANGE, CT)	

MOTION FOR CONTINUANCE AND ORDER


The Intervenors, ALBERT SUBBLOIE, JACQUELINE BARBARA, GLENN MACINNES, and JILL MACINNES (the “Intervenors”) respectfully request that the continued evidentiary hearing scheduled for August 12, 2014 be continued to September 2014. In the event that the Connecticut Siting Council (“CSC”) denies said request, in the alternative the Intervenors respectfully request that the CSC limit the evidentiary hearing on August 12, 2014 to a continued cross-examination and testimony of the applicant’s witnesses and continue the evidentiary hearing until September 16, 2014 to allow for the cross-examination and testimony of the Intervenors and their expert witnesses. If the evidentiary hearing is continued to September 16, 2014, the Intervenors respectfully request a reasonable extension of time to submit a second set of interrogatories and pre-file testimony in anticipation of the continued evidentiary hearing on September 16, 2014.

There are numerous reasons to support this request, including but not limited to: 1) the Intervenor was just granted party status in this proceeding on July 17, 2014; 2) the Intervenor needs a reasonable period of time to review the proposed application and prepare their case, including the preparation of pre-file testimony of the Intervenor and their expert witnesses; and 3) a denial of this motion would violate the due process rights of the Intervenor.

Wherefore, the Proposed Intervenor hereby request that:

1. The August 12, 2014 evidentiary hearing be postponed to September 2014;
2. In the alternative, the August 12, 2014 evidentiary hearing be limited to a cross-examination and testimony of the applicant's witnesses and continue the evidentiary hearing until September 16, 2014 to allow for the cross-examination and testimony of the Intervenor and their expert witnesses.
3. The deadline for the SECOND exchange of Interrogatories be scheduled for August 26, 2014 (please note that the Intervenor is NOT requesting an extension of the current exchange date for Interrogatories which is scheduled for July 29, 2014); and
4. The deadline for pre-file testimony by the Intervenor be extended to September 9, 2014.

**RESPECTFULLY SUBMITTED BY:
ALBERT SUBBLOIE, JACQUELINE BARBARA, GLENN
MACINNES, JILL MACINNES**

BY: 
Mario F. Coppola, Esq.
Berchem, Moses, and Devlin, P.C.
1221 Post Road East
Westport, CT 06880
Tel: 203-227-9545; Fax: 203-226-1641
Email: mcoppola@bmdlaw.com
Their Attorneys

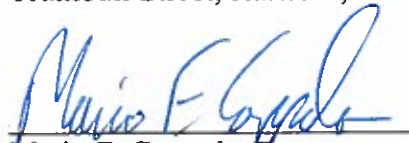
CERTIFICATE OF SERVICE

This is to certify that on the above date a true copy of the foregoing has been sent by U.S.

Mail, first-class, postage pre-paid, to the following parties of record:

Melanie Bachman, Esq., Executive Director, Connecticut Siting Council, 10 Franklin Sq., New Britain, CT 06051 (1 original, 15 copies, plus 1 electronic)

Cellco Partnership d/b/a Verizon Wireless, Kenneth Baldwin, Esq.; Robinson & Cole, 280 Trumbull Street, Hartford, CT 06103



Mario F. Coppola, Esq.