## **IDAHO SUPREME COURT**

2022 NOV -9 PM 2: 03

RICHARD KEAVY Petitioner - Appellant

V

IDAHO PUBLIC UTILITIES COMMISSION and QWEST CORP, dba CENTURYLINK COMMUNICATIONOS, LLC Respondents. Docket No. 49844-2022 DAHO PUBLIC Public Utilities Commission S COMMISSION QWE-T-21-14

Motion/Request for more time to respond, accumulate evidence held by the PUC, ascertain Bar standing on pending request, ascertain AttyGen place on recent relevant, material collaboration with several other states

Plaintiff requests up to six (6) months or whatever allowances the court finds appropriate...for these and other reasons. Please. The PUC put the substance of this case/matter off repeatedly for the better part of six (6) years. They wrote this year of an earlier allowance, very much in favor of the Respondents, that their doing so would not injure or trouble the Petitioners standing. Respectfully, six more months may well produce more and valuable/relevant data for the Court.

PUC Information Officer reported having accumulated 500+/- pages of Plaintiff requested, assumed relevant, FOIA data and awaits payment from Plaintiff. He cited Code and Commission have no part in the determination as to whether waiving related costs are part of PUC responsibility. Petitioner was informed that decision rests with the Commission.

Petitioner made application/request through the Idaho State Bar for ProBono legal assistance. The process claimed it may take roughly to two weeks to get a response from the application. Nothing has been returned in months. A follow up/inquiry request to Deputy Bar Counsel has not been returned.

Multiple questions and comments put to the PUC over time (and its state employed attorneys) have not been responded to and/or are not part of the Agency Record. Petitioner concern and objection to important missing and/or grossly inaccurate detail, from the PUC/AG, to the court and others has been regarded as immaterial and seemingly of no use to the court.

A local newspaper accounted recently that the Idaho Attorney General had joined with a dozen +/- others Attorney General to examine the business of long standing, loathsome, not well regulated, harassing call abuse along with significant and related disturbances...many in violation of good order and Federal Do Not Call concerns. The substance of this case IS about harassing, negligent, dismissive and dishonest treatment served continually (daily) on Idahoans and the Petitioner. The Idaho Attorney General and his team are likely to do good work in this remarkably neglected investigation. Their findings and results will likely reflect very much about the case and the people in background who regularly contributed to the harassment, abuse and deceptions. Please extend/allow more time, for cause and reason to be uncovered.

Respectfully, Richard Keavy

11/7/22

Cc: Counsel of Record, Idaho Public Utilities Commission