



BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

FILED

06/16/20
08:00 AM

Order Instituting Investigation on the Commission's Own Motion into the California's One Million New Internet Users Coalition's Misuse of California Advanced Services Fund Grant Funds; and Order to Show Cause Why the Commission Should Not Impose Penalties and/or Other Remedies for Violating Terms of Their Grant and for Refusing to Return Funds Previously Demanded by the Commission's Division.

Investigation 18-07-009

COMMUNITY UNION, INC.'S MOTION FOR AN EXTENSION OF TIME FOR DISCOVERY CUT-OFF

Pursuant to Rule 11.6 of the Rules of Practice and Procedure of the California Public Utilities Commission (CPUC), Community Union, Inc. respectfully makes a *Motion for an Extension of Time for Discovery Cut-Off*.

By this Motion, Community Union respectfully requests that the ALJ grant Community Union an extension of time for Discovery. Community Union requests Discovery cut-off to be 5:00 p.m., June 19, 2020.

Community Union will be unfairly prejudiced in their right to Discovery, if and when CPED files their Supplemental Staff Report, if Discovery cut-off is not extended to June 19, 2020. Community Union has the right to Discovery any new facts presented by CPED through their Supplemental Staff Report. CPED, by their statement during the last Status Conference, said the Supplemental Staff Report will be Chief in Case.

Community Union has located a majority of the MOU's (Memorandum of Understandings) associated to the Other Funding contributions made to the contract and is now in the process of properly scanning, labeling and ordering per CPED's request during our most recent Status Conference.

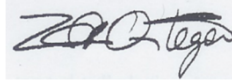
Community Union has found resources that will assist in the scanning of the remaining bank statements due CPED. We anticipate to have this completed by 8:00 p.m. on June 16, 2020.

Community Union has found the emails requested by CPED in regards to Community Union seeking KCCD's signature for Declaration Page included in the Quarterly Reimbursement Packages - have been deleted. Community Union is in the process of requesting from Network Solutions, the email hosting company at the time, the possibility of recovering those emails and making them available to CPED. We have not yet heard back from Network Solutions as to their answer on recovering deleted emails as of the close of business June 15, 2020. Community Union will follow-up with them again June 16th in the morning. It is unknown at this time how long it would take to convert and make those emails available to CPED, if and when Network Solutions says they can recover.

As has been articulated in Community Union's previous requests for extension of time, we are under extreme financial challenges during the Covid-19 shut down of schools and businesses, it is simply the very best we can do, but have found the means to deliver most or all of what CPD has requested, we just need a little bit more time.

For the foregoing reasons, Community Union respectfully request ALJ Zhang grant the Motion and extend the time for Discovery Cut-off to Friday, June 19, 2020 as requested herein.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Larry Ortega", is shown within a light gray rectangular box.

By: Larry Ortega
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Dated: June 15, 2020