



State of New Jersey  
DIVISION OF RATE COUNSEL  
140 EAST FRONT STREET, 4<sup>TH</sup> FL  
P. O. BOX 003  
TRENTON, NEW JERSEY 08625

CHRIS CHRISTIE  
*Governor*

KIM GUADAGNO  
*Lt. Governor*

STEFANIE A. BRAND  
*Director*

February 8, 2016

**Via Regular & Electronic Mail**

Joseph H. Orlando, Appellate Division Clerk  
Shari K. Black, Case Manager  
Superior Court of New Jersey – Appellate Division  
Richard J. Hughes Justice Complex  
25 Market Street,  
P.O. Box 006  
Trenton, New Jersey, 08625

Re: I/M/O the Board's Investigation Regarding the Reclassification of  
Incumbent Local Exchange Carrier Services  
Appellate Division Docket No.: A-004769-14, Team 02

Appellant's Reply Brief, Supplemental Appendix and  
Notice of Motion Requesting Permission to File an Over-Length Brief

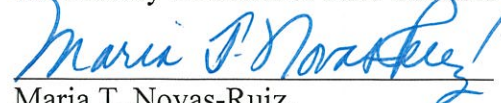
Dear Mr. Orlando and Ms. Black:

Annexed is Appellant, the New Jersey Division of Rate Counsel's Reply Brief, Supplemental Appendix, and Notice of Motion for permission to file an over-length brief with accompanying documents in support thereof, along with Appellant's Certification of Service.

Kindly return a stamped filed copy to Rate Counsel for its record. Thank you for your assistance and attention on this matter.

Respectfully Submitted,

Stefanie A. Brand, Director  
New Jersey Division of Rate Counsel

  
Maria T. Novas-Ruiz,  
Assistant Deputy Rate Counsel

c: Service List  
(via regular and electronic mail)

**SUPERIOR COURT OF NEW JERSEY  
APPELLATE DIVISION**

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T(609)984-1460 \* F(609)292-2923  
Attorneys for Appellant

IN THE MATTER OF THE BOARD'S )	<b>APPELLATE DIVISION</b>
INVESTIGATION REGARDING THE )	
RECLASSIFICATION OF )	<b>DOCKET NO.A-004769-14T2</b>
INCUMBENT LOCAL EXCHANGE )	
SERVICES AS COMPETITIVE )	CIVIL ACTION
)	
)	On Appeal from the
)	May 19, 2015 Order of the
)	New Jersey Board of Public
)	Utilities in BPU Docket
)	No. TX11090570
)	
)	<b>APPELLANT'S NOTICE OF</b>
)	<b>MOTION TO FILE AN</b>
)	<b>OVER-LENGTH REPLY BRIEF</b>


TO:  
SUPERIOR COURT OF NEW JERSEY and ALL PARTIES ON ATTACHED  
APPELLATE DIVISION SERVICE LIST  
Joseph H. Orlando, Clerk  
Shari M. Black, Case Manager  
Superior Court of New Jersey  
Appellate Division  
Hughes Justice Complex  
25 Market Street, P.O. Box 006  
Trenton, New Jersey, 08625

**PLEASE TAKE NOTICE** that Stefanie A. Brand, Director of the State of New Jersey, Division of Rate Counsel (by the undersigned, Maria T. Novas-Ruiz, Assist. Deputy Rate Counsel) on behalf of Appellant, the New Jersey Division of

Rate Counsel, hereby moves before the Superior Court of New Jersey, Appellate Division, for an Order granting leave/permission to file an over-length reply brief in response to Respondents Verizon and the New Jersey Board of Public Utilities briefs in the above-captioned appeal.

In support of this motion, Appellant relies upon the attached certification of Maria T. Novas-Ruiz, Assistant Deputy Rate Counsel.

STEFANIE A. BRAND,  
DIRECTOR  
STATE OF NEW JERSEY  
DIVISION OF RATE COUNSEL

By:   
\_\_\_\_\_  
Maria T. Novas-Ruiz,  
Assistant Deputy Rate Counsel  
On behalf of Appellant,  
New Jersey Division of Rate Counsel

Dated: February 8, 2016.

**SUPERIOR COURT OF NEW JERSEY  
APPELLATE DIVISION**

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Attorneys for Appellant

IN THE MATTER OF THE BOARD'S )	<b>APPELLATE DIVISION</b>
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)	Utilities in BPU Docket
)	No. TX11090570
)	
)	<b>CERTIFICATION OF</b>
)	<b>MARIA T. NOVAS-RUIZ</b>
)	
)	<b>IN SUPPORT OF APPELLANT'S</b>
)	<b>NOTICE OF MOTION TO FILE AN</b>
)	<b>OVER-LENGTH REPLY BRIEF</b>

I, MARIA T. NOVAS-RUIZ, of full age, hereby certify that:

1) I am an Assistant Deputy Rate Counsel, in the State of New Jersey with the Division of Rate Counsel, and I am assisting in the handling of the above-captioned matter.

2) Due to the length of Reply Briefs filed by Respondents Verizon and the New Jersey Board of Public Utilities which total

54 and 63 pages respectively, and include a total of 18 Volumes of Appendices, as well as the number and complexity of issues involved, required significant briefing to allow a thorough analysis of the decisions and orders cited by Respondents therein.

3) Further, Appellant's Reply Brief submitted herein, extends the 20-page reply brief limit under R. 2:6-7 by only six pages for a total of 26-pages exclusive of the table of contents and citations.

For these reasons, Appellant, the New Jersey Division of Rate Counsel respectfully requests that this Court grant leave pursuant to R. 2:6-7, for Appellant to file a 26-page Reply Brief.

I certify the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I will be subject to punishment.



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Maria T. Novas-Ruiz,  
Assistant Deputy Rate Counsel  
On behalf of Appellant,  
New Jersey Division of Rate Counsel

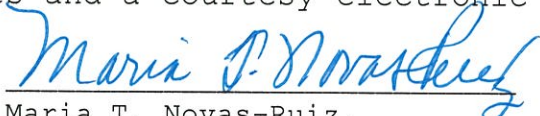
Dated: February 8, 2016.

**SUPERIOR COURT OF NEW JERSEY  
APPELLATE DIVISION**

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Attorneys for Appellant

IN THE MATTER OF THE BOARD'S )	<b>APPELLATE DIVISION</b>
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)	No.: TX11090570
)	
)	<b>CERTIFICATION OF SERVICE</b>
)	<b>OF APPELLANT'S</b>
)	<b>REPLY BRIEF, SUPPLEMENTAL</b>
)	<b>APPENDIX AND NOTICE OF</b>
)	<b>MOTION TO FILE AN OVER-</b>
)	<b>LENGTH REPLY BRIEF</b>

I hereby certify that on the 8th day of February 2016, I mailed an original and five copies of the Appellant's Reply Brief, Supplemental Appendix and Notice of Motion Requesting to File an Over-Length Reply Brief and accompanying Supporting Certification, with the Clerk of the Superior Court, Appellate Division, and the Case Manager, Ms. Shari Black. Parties on the attached service list have been served with two copies each of the referenced documents and a courtesy electronic pdf copy of Appellant's filing.

  
\_\_\_\_\_  
Maria T. Novas-Ruiz,  
Assistant Deputy Rate Counsel  
On behalf of Appellant



SERVICE LIST

IMO the Board's Investigation Regarding the Reclassification of  
Incumbent Local Exchange Carrier (ILEC) Services as Competitive  
Phase II - BPU Docket No.: TX11090570

Appellate Division  
Docket No.: A-004769-14T2

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