

THE STATE OF NEW HAMPSHIRE

SUPREME COURT

2008 TERM

No. 2008-0645

**Appeal of Verizon New England Inc.,
d/b/a Verizon New Hampshire
Northern New England Telephone Operations LLC
d/b/a FairPoint Communications-NNE**

OBJECTION TO MOTIONS TO FILE REPLY

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OBJECTION TO MOTIONS TO FILE REPLY

NOW COME Verizon New England Inc. d/b/a Verizon New Hampshire (“Verizon”) and Northern New England Telephone Operations LLC d/b/a FairPoint Communications-NNE (“FairPoint”) (together “Verizon”), by and through their undersigned attorneys, pursuant to Supreme Court Rule 22(3-A), and hereby object to the Motion for Permission to File a Reply filed on May 29, 2009 by Freedom Ring Communications d/b/a BayRing Communications and Choice One of New Hampshire, Inc., Conversent Communications of New Hampshire, CTC Communications Corp., and Lightship Telecom, LLC, all d/b/a One Communications, and to the separate Motion for Leave To File Reply filed on June 1, 2009 by AT&T Corporation (together with BayRing Communications and One Communications, “Appellees”). In support of this objection, Verizon and FairPoint state as follows:

1. Appellees’ motions are unfounded. This Honorable Court issued its decision following substantial briefing and oral argument. The Court’s decision is well-reasoned and reaches the only conclusion consistent with the plain language of the tariff as a whole. Appellees’ Motions for Reconsideration and/or Rehearing seek to reargue points previously briefed, which this Court has properly rejected, and to proffer meritless arguments that Appellees waived by failing to present them in their opening briefs. Reply briefs on Appellees’ motions are unnecessary and would not be helpful to the Court.

2. In view of the foregoing, Verizon and FairPoint respectfully submit that no further briefing is necessary for the Court to decide Appellees’ Motions for Reconsideration or Rehearing.

WHEREFORE, Appellants respectfully pray that this Honorable Court:

- A. Deny Appellees' Motions to File a Reply; and
- B. Grant such further relief as the Court deems just and equitable.

Respectfully submitted,

VERIZON NEW ENGLAND INC.,
D/B/A VERIZON NEW HAMPSHIRE

NORTHERN NEW ENGLAND TELEPHONE
OPERATIONS LLC D/B/A FAIRPOINT
COMMUNICATIONS-NNE

By their Attorneys,

MUNGER, TOLLES & OLSON LLP
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PROFESSIONAL ASSOCIATION

Date: June 3, 2009

By:  FOR SARAH B. KNOWLTON

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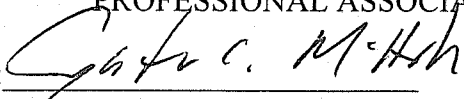
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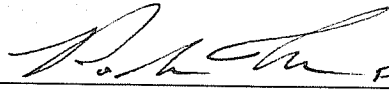
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CERTIFICATION OF COMPLIANCE

I hereby certify that I have this 3rd day of June 2009 forwarded a copy of the foregoing Objection to Motions to File Reply by first class mail, postage prepaid, to the parties of record, and the Attorney General of the State of New Hampshire.

 FOR SARAH B. KNOWLTON

Sarah Knowlton