



**Fox Rothschild** LLP  
ATTORNEYS AT LAW

434 Fayetteville Street  
Suite 2800  
Raleigh, NC 27601  
Tel 919.755.8700 Fax 919.755.8800  
www.foxrothschild.com

GRAY STYERS  
Direct No: 919.755.8741  
Email: GStyers@Foxrothschild.com

February 23, 2022

Ms. A. Shonta Dunston  
Chief Clerk  
North Carolina Utilities Commission  
430 N. Salisbury Street  
Raleigh, NC 27603

**RE: *Village of Bald Head Island v. Bald Head Island Transportation, Inc.  
and Bald Head Island Limited, LLC  
NCUC Docket No. A-41, Sub 21***

Dear Ms. Dunston:

Enclosed for filing please find Respondents' Motion for Extension of Time for an additional thirty (30) days to respond to the Complaint filed in the above-referenced docket.

The Complainant has consented to the requested extension.

Please let me know if you have any questions or need further information.

Sincerely,

  
M. Gray Styers

Enclosure

cc: All parties of record

**OFFICIAL COPY**

Feb 23 2022

In the Matter of	)	
Village of Bald Head Island,	)	
Complainant,	)	MOTION
	)	FOR
v.	)	EXTENSION OF TIME
	)	TO
Bald Head Island Transportation, Inc., and	)	RESPOND TO COMPLAINT
Bald Head Island Limited, LLC,	)	
Respondents.	)	

1. On February 17, 2022, the North Carolina Utilities Commission (“Commission”) issued an Order Serving Complaint and Request for Determination of Public Utility Status which directed Respondents to either satisfy the demands of the Complainant or to file an Answer with the Commission on or before February 28, 2022, in compliance with Rule R1-19 of the Commission’s Rules of Practice and Procedure.
2. Respondents intend to file a response and Answer to the Complaint. However, in order to fully, properly and adequately respond to the many

allegations and the legal issues raised in the Complaint, Respondents will need more time and hereby request a 30-day extension of time through and including March 30, 2022, in order to respond.

3. Counsel for Complainant has been contacted regarding this Motion, and Complainant consents to the requested extension of an additional thirty (30) days.

WHEREFORE, Respondents respectfully request that they be granted a 30-day extension of time, through and including March 30, 2022, to file an Answer in response to Complainant's Complaint.

Respectfully submitted this 23rd day of February, 2022.

FOX ROTHSCHILD LLP

*/s/ M. Gray Styers, Jr.*

M. Gray Styers, Jr.

N.C. State Bar No. 16844

Bradley M. Risinger

N.C. State Bar No. 23629

434 Fayetteville Street

Suite 2800

Raleigh, North Carolina 27601

Telephone: 919-755-8700

Facsimile: 919-755-8800

Email: [gstyers@foxrothschild.com](mailto:gstyers@foxrothschild.com)

Email: [brisinger@foxrothschild.com](mailto:brisinger@foxrothschild.com)

*Attorneys for Respondents,*

*Bald Head Island Transportation, Inc.*

*Bald Head Island Limited, LLC*

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of the foregoing **MOTION FOR EXTENSION OF TIME TO RESPOND TO COMPLAINT** has been served on all parties of record by first class mail deposited with the United State Postal Service, in a postage pre-paid envelope, or by e-mail transmission with the party's consent. The parties hereto are as follows:

Marcus W. Trathen  
Craig D. Schauer  
Brooks, Pierce, McLendon, Humphrey  
& Leonard, LLP

150 Fayetteville Street  
Suite 1700  
Raleigh, NC 27601

P. O. Box 1800  
Raleigh, NC 27602

Email: [mtrathen@brookspierce.com](mailto:mtrathen@brookspierce.com)  
Email: [cschauer@brookspierce.com](mailto:cschauer@brookspierce.com)

*Attorneys for:*  
*Village of Bald Head Island*

Christopher Ayers  
Dianna Downey  
Zeke Creech  
NC Utilities Commission  
Dobbs Building  
430 N. Salisbury Street  
Raleigh, NC 27603-5918

Email: [chris.ayers@psncuc.nc.gov](mailto:chris.ayers@psncuc.nc.gov)  
Email: [dianna.downey@psncuc.nc.gov](mailto:dianna.downey@psncuc.nc.gov)  
Email: [zeke.creech@psncuc.nc.gov](mailto:zeke.creech@psncuc.nc.gov)

*North Carolina Utilities Commission –  
Public Staff*

This the 23rd day of February 2022.

*/s/ M. Gray Styers, Jr.*

---

M. Gray Styers, Jr.  
Fox Rothschild LLP  
434 Fayetteville Street  
Suite 2800  
Raleigh, NC 27601  
Telephone: (919) 755-8700  
E-mail: [gstyers@foxrothschild.com](mailto:gstyers@foxrothschild.com)

*Attorneys for:*  
*Bald Head Island Transportation, Inc. and*  
*Bald Head Island Limited, LLC*