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June 29, 2022

Ms. A. Shonta Dunston
Chief Clerk
North Carolina Utilities Commission
430 N. Salisbury Street
Room 5063
Raleigh, NC 27603

Re: In the Matter of
Village of Bald Head Island v. Bald Head Island Transportation, Inc.
and Bald Head Island Limited, LLC
NCUC Docket No. A-41, Sub 21
*Motion for Extension of Time to Respond to the Village of Bald Head Island's
First Data Requests*

Dear Ms. Dunston:

On behalf of Bald Head Island Transportation, Inc. and Bald Head Island Limited, LLC, I respectfully submit the attached Motion for Extension of Time to Respond to the Village of Bald Head Island's First Data Requests.

Thank you in advance for your assistance with this filing. If you should have any questions concerning this submittal, please contact me.

Sincerely,

Brad M. Risinger

pbb

A Pennsylvania Limited Liability Partnership

California Colorado Delaware District of Columbia Florida Georgia Illinois Minnesota
Nevada New Jersey New York North Carolina Pennsylvania South Carolina Texas Washington

Enclosure

cc: All Parties and Counsel of Record

OFFICIAL COPY

Jun 29 2022

**STATE OF NORTH CAROLINA
UTILITIES COMMISSION
RALEIGH**

DOCKET NO. A-41, SUB 21

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

In the Matter of

VILLAGE OF BALD HEAD ISLAND,)	
)	
Complainant,)	
v.)	MOTION FOR EXTENSION OF TIME
)	TO RESPOND TO THE VILLAGE OF
BALD HEAD ISLAND)	BALD HEAD ISLAND'S FIRST
TRANSPORTATION, INC. and)	DATA REQUESTS TO BALD HEAD
BALD HEAD ISLAND LIMITED,)	ISLAND TRANSPORTATION, INC.
LLC,)	AND BALD HEAD ISLAND
)	LIMITED, LLC
Respondents.)	

NOW COME Bald Head Island Transportation, Inc. ("BHIT") and Bald Head Island Limited, LLC ("BHIL", and collectively, "Respondents"), by and through undersigned counsel, and pursuant to Rule 1-7 of North Carolina Utilities Commission ("Commission") Rules, for the purpose of seeking a seven (7) day extension for Respondents to respond to Complainants' First Data Requests that were served on June 22, 2022. Based on the Commission's Scheduling Order of June 17, 2022, Respondents' existing deadline to provide responses to the Data Requests would be July 5, 2022. Respondents respectfully request a seven-day extension through and including July 12, 2022.

In support of this Motion, Respondents respectfully show the Commission the following:

1. The Data Requests include 25 individual requests that, themselves, include multiple sub-components. Preparing responses to the Data Requests will require detailed coordination between counsel and clients, and an extension is not sought for purposes of delay but instead to allow time for appropriate consideration and response to the requests. Respondents and their counsel are working diligently, including through the coming holiday, to identify and gather information to support responses as well as enable the production of responsive materials.

2. Respondents have consulted with counsel for the Village regarding the seven-day extension requested here and were advised that, due to the deadlines set forth in the Commission's scheduling order, the Village could consent only to a two-and-a-half day extension that would have the Respondents' responses to the Data Requests due at noon on July 8. The Village's consent to a two-and-a-half day extension also was conditioned upon any objections to be posed by Respondents being limited to "standard objections for privileged materials."

3. Respondents intend to provide to the Village, by the existing July 5 due date, objections to individual data requests to which Respondents do not intend to provide information based on their stated objections. Respondents seek the requested seven-day extension to provide responses, and produce responsive materials, to the remaining requests not encompassed in their July 5 response.

WHEREFORE, Respondents respectfully request that the Commission grant an additional seven (7) days, to and including July 12, 2022, in which they may respond to the individual data requests in the Village's First Data Requests as described herein.

Respectfully submitted, this 29th day of June, 2022.

FOX ROTHSCHILD LLP

/s/ Bradley M. Risinger

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

CERTIFICATE OF SERVICE

This is to certify that the undersigned has this date served the attached Motion for Extension of Time to Respond, in the above-captioned case, which was filed on June 29, 2022, by electronic mail to the parties of record or by depositing a copy in the United States Postal Service in a postage-prepaid envelope, addressed as follows:

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*North Carolina Utilities Commission
Public Staff*

This the 29th day of June, 2022.

/s/ Bradley M. Risinger
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