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March 4, 2013

Via Federal Express

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor
Harrisburg, PA 17120

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MAR 04 2013

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Re: Core Communications, Inc.
v. Verizon Pennsylvania Inc. and Verizon North LLC;
Docket Nos. C-2011-2253750 and C-2011-2253787

Dear Secretary Chiavetta:

Enclosed for filing please the Joint Motion of Verizon and Core for Admission of Late Filed Exhibits, being filed on behalf of Verizon Pennsylvania LLC and Verizon North LLC and Core Communications, Inc. (collectively, "the Joint Parties") in the above captioned matter.

Please note that the Late Filed Exhibits that are the subject of the Joint Parties' Joint Motion are Proprietary.

If you have any questions, please feel free to contact me.

Very truly yours,

A handwritten signature in black ink, appearing to read "Suzan D. Paiva".

Suzan D. Paiva

SDP/slb

Via E-Mail and Federal Express
cc: The Honorable Susan D. Colwell
Attached Certificate of Service

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Core Communications, Inc.,	:	
	:	
Complainant,	:	
	:	
v.	:	Docket No. C-2011-2253750
	:	Docket No. C-2011-2253787
Verizon Pennsylvania Inc. and	:	
Verizon North LLC,	:	
Respondents.	:	

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**JOINT MOTION
OF VERIZON AND CORE FOR
ADMISSION OF LATE FILED EXHIBITS**

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Pursuant to 52 Pa. Code § 5.402, Verizon Pennsylvania LLC and Verizon North LLC (“Verizon”) and Core Communications, Inc. (“Core”) (together, “the parties”) jointly move for the admission into the record of three late-filed exhibits, pursuant to the stipulations described below. In support of this joint motion the parties aver as follows:

1. On February 6, 2013, Core filed a “Consolidated Expedited Motion to Compel Supplemental Discovery Responses, Petition to Reopen the Record, and Motion for Sanctions” (“Core Motion”). Verizon opposed the Core Motion on February 8, 2013 (“Verizon Response”), and Core sought leave to file a reply on February 11, 2013 (“Core Reply”). A hearing has been scheduled for March 4, 2013 to address the Core Motion.
2. The parties have reached the following agreement that will avoid the need to decide the Core Motion, subject to the granting of this joint motion without alteration.
3. The parties stipulate to the withdrawal of the Core Motion, the Verizon Response and the Core Reply, and the allegations made therein.

4. Verizon agrees to construe the Core Motion as a request for production of the document attached hereto as Core/Verizon Joint Proprietary Exhibit 1 (“Joint Proprietary Exhibit 1”), and in response to that request, will produce that proprietary document to Core subject to the protective order entered in this matter.

5. The parties stipulate and agree that Joint Proprietary Exhibit 1 was not previously requested in discovery and that neither party will make any further allegations of impropriety by the other with respect to the discovery process in this proceeding with regard to Joint Proprietary Exhibits 1, 2 and 3 (discussed below).

6. The parties jointly request that Joint Proprietary Exhibit 1 be admitted into the record as a late-filed exhibit without the submission of additional testimony or evidentiary hearing, and subject to the simultaneous admission of each party’s Affidavit relating to Joint Proprietary Exhibit 1, described in the following paragraph,

7. Verizon’s Affidavit is attached hereto as Core/Verizon Joint Proprietary Exhibit 2 (“Joint Proprietary Exhibit 2”). Core’s Affidavit is attached hereto as Core/Verizon Joint Proprietary Exhibit 3 (“Joint Proprietary Exhibit 3”). The parties agree to the admission of the Joint Proprietary Exhibits 2 and 3 as the sworn testimony of each party relating to Joint Proprietary Exhibit 1, without hearing or cross-examination, but do not stipulate to the truth of the statements contained in the other party’s Affidavit.

8. The parties jointly request that post-hearing reply briefs be due on March 18, 2013.

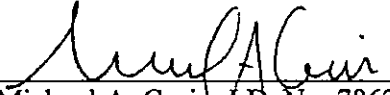
9. The parties jointly request that by March 25, 2013, each party be permitted to file a post-hearing surreply brief of not more than ten (10) pages, which surreply brief shall be

limited solely to responding to the other party's discussion of Joint Proprietary Exhibits 1, 2 and 3 in its reply brief.


10. The parties stipulate and agree that the hearing scheduled for March 4, 2013 should be cancelled.

WHEREFORE, for the foregoing reasons Core and Verizon request that this joint motion for the admission of Joint Proprietary Exhibits 1, 2 and 3 as late-filed exhibits be granted.

Respectfully submitted,


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*Counsel for Verizon Pennsylvania LLC
and Verizon North LLC*

Dated: March 4, 2013

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CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the Joint Motion of Verizon and Core for Admission of Late Filed Exhibits, upon the parties listed below, in accordance with the requirements of §1.54 (relating to service by a party) and 1.55 (related to service upon attorneys).

Dated at Philadelphia, Pennsylvania, this 4th day of March, 2013.

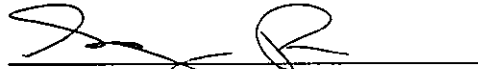
Via E-Mail and Federal Express

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