STATE OF RHODE ISLAND AND PROVIDENCE PLANTATION SUPREME COURT

IN RE THE NARRAGANSETT ELECTRIC COMPANY, d/b/a/

NATIONAL GRID, e-183 115 Kv

TRANSMISSION LINE

RELOCATION PROJECT

No. SU-2018-0040

EFSB Docket No. SB-2003-01

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PETITIONERS' FIRST MOTION TO EXTEND THE TIME FOR FILING THEIR RULE 12A STATEMENT

Petitioners, the City of Providence ("Providence"); the Friends of India Point Park (the "FIPP"), a Rhode Island non-profit corporation; Procaccianti Companies, Inc., a Delaware corporation, d/b/a The Hilton Garden Inn (the "Hotel"); and McMac, Inc., a New York S corporation, d/b/a The R.I. Seafood Festival (the "Seafood Festival") (collectively, the "Petitioners"), hereby jointly move pursuant to Art. I, Rule 20 of the Supreme Court Rules of Appellate Procedure for a thirty (30) day extension – to the close of business on Thursday, August 2, 2018 – within which to file their Rule 12A Statement in the above matter.

As grounds, Petitioners aver that:

- (1) There are thousands of pages of hearing transcripts, pre-filed testimony and expert reports spanning nearly fifteen (15) years which are relevant to the issues on appeal;
- (2) The appeal concerns and will address complex and novel factual and legal issues;
- (3) The attorneys for Providence and the Hotel both have extremely busy criminal and civil caseloads during the next few months; and
- (4) Finally, the requested extension will not unduly delay consideration of the case or prejudice opposing parties.

THE CITY OF PROVIDENCE, By its attorney,

Jeffrey B/Vine, Esq. (#2278)

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THE FRIENDS OF INDIA POINT PARK, PROCACCIANTI COMPANIES, INC., d/b/a the Hilton Garden Inn, and McMAC, INC., d/b/a The R.I. Seafood Festival, By their attorney,

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July <u>2</u>, 2018

CERTIFICATE OF SERVICE

Kimberly Alampagna

I hereby certify that on this 2nd of July, 2018, I caused a true and accurate copy of the within Motion to be delivered by electronic and/or first-class mail to:

DOCKET NO. SU-2018-0040 EFSB Docket No. SB-2003-01 In Re Narragansett Electric Company d/b/a National Grid E-183 115 Ky Transmission Line Relocation Project

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