

**STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION**

NEXTEL PARTNERS, INC. and)	
NPCR, INC.)	
)	Docket No. 05-0440
)	
Application for Certificates of Service)	
Authority to Operate as Providers of)	
CMRS Telecommunications Services in)	
the State of Illinois)	
)	

MOTION FOR SPECIAL LEAVE TO ENTER APPEARANCE

NOW COMES Philip R. Schenkenberg, (“Movant”) of the law firm of Briggs and Morgan, P.A., and pursuant to 220 ILCS 5/10-101 and Illinois Commerce Commission Rule of Practice 200.90 hereby seeks special leave from the Administrative Law Judge to enter his appearance on behalf of Petitioners, Nextel partners, Inc. and NPCR, Inc. In support of this motion, Movant states as follows:

1. Movant practices law in the State of Minnesota pursuant to his license to practice in that state.
2. Granting leave to appear will further the goals set forth in Section 200.25 of the Illinois Commerce Commission’s rules in that it will ensure the integrity and expediency of the regulatory process, it is fair, convenient and cost effective to Petitioners, who regularly employ Movant for legal representation in its regulatory matters, and is fair to other parties that will not be harmed by Movant’s participation in this proceeding.

3. This motion is appropriate under Illinois Commerce Commission Rule of Practice 200.90 because Minnesota grants leave to Illinois attorneys in similar situations.
See Minn. Stat. § 481.02, subd. 6.
4. Granting special leave in such circumstances is within the power of the Commission. *Alhambra-Grantfork Telephone Company v. ICC*, 832 N.E.2d 869 (5th Dist, 2005).

WHEREFORE, Movant respectfully request special leave of the Administrative Law Judge pursuant to Rule of Practice 200.90 to appear before and be heard by the Illinois Commerce Commission in this matter.

Dated: October 5, 2005

Respectfully Submitted:

s/ Philip R. Schenkenberg
Philip R. Schenkenberg

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CERTIFICATE OF SERVICE

I, Stephen J. Moore, hereby certify that a copy of the enclosed Motion for Special Leave to Enter Appearance was served on all parties to the attached service list on October 5, 2005 electronically.

s/ Stephen J. Moore
Stephen J. Moore

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