

BEFORE THE  
**Federal Communications Commission**  
WASHINGTON, D. C. 20554

In re Application of )  
 )  
**ST. JOSEPH'S CATHOLIC SCHOOL,** )  
**INC.** ) File No. BAPED-20150923AMO  
 ) Facility ID # 173384  
and )  
 )  
**THE POWER FOUNDATION** )  
 )  
For Assignment of Construction )  
Permit of FM Broadcast Station )  
WHQB, Gray Court, South Carolina )

TO: Office of the Secretary

ATTN: Chief, Media Bureau

**MOTION FOR EXTENSION OF TIME**

St. Joseph's Catholic School, Inc. (SJCS), permittee of FM Translator Station WHQB, Gray Court, South Carolina, hereby respectfully moves for an extension of time to and including Tuesday, November 17, 2015 to respond to the "Petition to Deny" filed by Richburg Educational Broadcasters, Inc. (REBI) on October 26, 2015. In so doing whereof, the following is shown:

1. Section 73.3584(b) of the FCC's Rules allows a party in the posture of SJCS 10 days in which to file an Opposition to a Petition to Deny. Since REBI served its petition on SJCS by mail, Section 1.4(h) of the FCC's Rules provides that SJCS would receive an additional three days (excluding holidays) in which to

file a response. This makes the current due date for SJCS's Opposition Tuesday, November 10, 2015.

2. SJCS needs an additional seven calendar days, to and including Tuesday, November 17, 2015, to file an Opposition, in order to investigate REBI's claims. Counsel for REBI was contacted concerning this request and has graciously authorized the undersigned to state that he would not interpose an objection to the grant of this extension request.

WHEREFORE, it is urged that this "Motion for Extension of Time" **BE GRANTED** and that the due date for an Opposition to Richburg Educational Media, Inc.'s "Petition to Deny" **BE EXTENDED** to and including Tuesday, November 17, 2015.

Respectfully submitted,

**ST. JOSEPH'S CATHOLIC SCHOOL, INC.**

A handwritten signature in black ink, appearing to read "D. Kelly", written over a horizontal line.

By

Dennis J. Kelly  
Its Attorney

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DATED: November 5, 2015

**CERTIFICATE OF SERVICE**

It is hereby certified that a true copy of the foregoing "Motion for Extension of Time" were served by e-mail on this 5<sup>th</sup> day of November, 2015 upon the following:

David Tillotson, Esquire  
4606 Charleston Terrace, NW  
Washington, DC 20007  
Counsel for Richburg Educational Broadcasters,  
Inc.

John C. Trent, Esquire  
Putbrese, Hunsaker & Trent  
200 S. Church Street  
Woodstock, VA 22664  
Counsel for The Power Foundation

Michael Wagner, Esquire  
Audio Division, Media Bureau  
Federal Communications Commission  
Washington, DC 20554



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Dennis J. Kelly