

**IN THE SUPREME COURT  
OF THE  
STATE OF SOUTH DAKOTA**

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**BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF SOUTH DAKOTA**

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IN THE MATTER OF PUC DOCKET  
HP14-0001,  
ORDER ACCEPTING CERTIFICATION  
OF PERMIT ISSUED IN DOCKET  
HP09-001 TO CONSTRUCT THE  
KEYSTONE XL PIPELINE

FILE NO. \_\_\_\_\_

**MOTION FOR LEAVE FOR LATE  
FILING IN ODYSSEY SYSTEM AND  
CERTIFICATE OF SERVICE**

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COMES NOW Appellant INTERTRIBAL COUP by and through its attorney Robert P. Gough, to respectfully move the Court to grant leave for late filing through the Odyssey E-filing system for its Notice of Appeal, Docketing Statement and Certificate of Service in the above caption matter on the following grounds:

1. Attorney had technical difficulties in properly submitting these documents through the Odyssey system. Hours of attempting to execute through the Odyssey system were spent both yesterday and today trying to navigate Odyssey so as to e-file with the Supreme Court for the State of South Dakota in a timely fashion on July 20, 2017 and to get the payment system to load and accept payment even today.
2. Faced with not being able to file through Odyssey, I reverted to filing such documents within the appropriate time frame that day via email to the Clerk of the Supreme Court and all parties in this matter yesterday.
3. Upon discussions with the clerks of court of both the South Dakota Supreme Court and the Sixth Circuit Court in Hughes County, Intertribal COUP has filed through the Odyssey system on July 21, 2017, as instructed.

Based upon the foregoing, Intertribal COUP requests leave for this later, second filing, through the Odyssey system to be deemed within the time requirements for filing this appeal.

Dated this 21st day of July 2017.



By:

Robert P. Gough, SD SB# 620  
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**Attorney for Intertribal COUP**

#### CERTIFICATE OF SERVICE

Robert Gough, Attorney for Intertribal COUP, does hereby certify that he served a true and correct copy of the MOTION FOR LEAVE FOR LATE FILING AND CERTIFICATE OF SERVICE via electronic mail upon the following:

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Date: July 21, 2017



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