

May 1, 2008

89010.0174

VIA EMAIL AND U.S. MAIL

Ms. Carole J. Washburn
WUTC Executive Secretary
Washington Utilities and Transportation Commission
1300 S. Evergreen Park Drive SW
P.O. Box 47250
Olympia, WA 98504

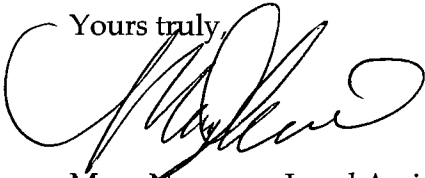
Re: *Waste Connections of Washington, Inc. v. Enviro/Con & Trucking, Inc., et al.*
Docket No. TG-071194

Dear Ms. Washburn:

Enclosed please find the original and three copies of Waste Connections of Washington, Inc.'s Motion of the Complainant for Extension of Time for Filing Petition for Administrative Review, with Certificate of Service, for filing with the Commission. Also enclosed is an extra copy of the face sheet that we would ask be stamped and returned to us in the enclosed self-addressed stamped envelope.

Please contact me if you have any questions or concerns.

Yours truly,



Mary Newman, Legal Assistant
(206) 628-2413
mnewman@williamskastner.com

:men
Enclosures

cc: All parties of record

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5
6 **BEFORE THE WASHINGTON STATE**
7 **UTILITIES AND TRANSPORTATION COMMISSION**

8 WASTE CONNECTIONS OF
9 WASHINGTON, INC.,

10 Complainant,

11 v.

12 ENVIRO/CON & TRUCKING, INC., a
13 Washington corporation; and, WASTE
14 MANAGEMENT DISPOSAL SERVICES OF
OREGON, INC.,

Respondents.

DOCKET NO. TG-071194

MOTION OF THE COMPLAINANT
FOR EXTENSION OF TIME FOR
FILING PETITION FOR
ADMINISTRATIVE REVIEW

15 **I. PRELIMINARY STATEMENT**

16 1 COMES NOW Waste Connections of Washington, Inc. ("WCW"), by and through its
17 counsel Williams, Kastner & Gibbs PLLC and David W. Wiley, and requests a
18 continuance for filing a Petition for Administrative Review (the "Petition") of the Initial
19 Order No. 3 granting Motion for Summary Adjudication served April 22, 2008 in this
20 matter, pursuant to WAC 480-07-385.

21 **II. SPECIFIC EXTENSION REQUEST**

22 2 By calculations under rule, the Petition in this matter would currently be due, Tuesday,
23 May 13, 2008. We are, by this motion, seeking an extension of time to and including
24 Friday, May 30, 2008 for filing of the Petition, and also ask that email service be
25 permitted on that extended date with hard copy mail to be postmarked concurrently.

MOTION OF THE COMPLAINANT FOR EXTENSION OF TIME
FOR FILING PETITION FOR ADMINISTRATIVE REVIEW - 1

Williams, Kastner & Gibbs PLLC
601 Union Street, Suite 4100
Seattle, Washington 98101-2380
(206) 628-6600

1 Additionally, should Petitioner for any reason later determine not to file a Petition, it
2 will advise the parties and Commission as soon as such a decision is reached before any
3 extended due date.

4 **III. REASON FOR THE REQUEST**

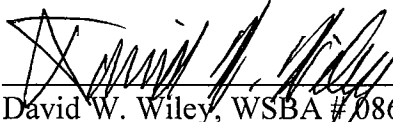
5 3 This request is directly occasioned by the undersigned's travel schedule in the next few
6 weeks which requires him to be out of the office for significant periods of time.
7 Additionally, I am scheduled for motions, prehearing conference and a three-day
8 hearing in Docket No. TV-071125 in June and to file Answers on a Motions for
9 Summary Adjudication in Docket TG-072226 in the middle of May, the preparation
10 and scheduling for all of which further extends the preferred due date. I originally
11 notified the Respondents' counsel of this generalized request via email on Tuesday,
12 April 22, 2008, and April 23, 2008 and have discussed the Complainant's preferred
13 extension dates with her. Neither of the two Intervenors has objections to this request.

14 **IV. PRAYER FOR RELIEF**

15 4 Wherefore WCW, Complainant herein, asks that the Commission grant a continuance
16 to it for filing of a Petition for Administrative Review of the Initial Order to and
17 including Friday, May 30, 2008, for service via email and for concurrent postmarking
18 on that date of hard copy versions.

19 DATED this 1 day of May, 2008.

20 WILLIAMS, KASTNER & GIBBS PLLC

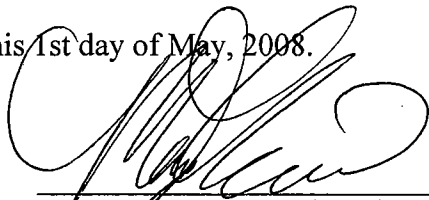
21 By 
22 David W. Wiley, WSBA # 08614
23 Attorneys for Complainant WASTE
24 CONNECTIONS OF WASHINGTON,
25 INC.

CERTIFICATE OF SERVICE

I hereby certify that I have this day served this document upon all parties of record in this proceeding, by the method as indicated below, pursuant to WAC 480-07-150.

<p><i>Attorneys for Waste Management Disposal Services of Oregon, Inc.</i> Polly L. McNeill Summit Law Group 315 – 5th Avenue S. Seattle, Washington 98104 pollym@summitlaw.com</p>	<p><input type="checkbox"/> Via Legal Messenger <input type="checkbox"/> Via Facsimile <input checked="" type="checkbox"/> Via U.S. Mail <input checked="" type="checkbox"/> Via Email</p>
<p>Brad Lovaas Executive Director Washington Refuse and Recycling Association 4160 6th Avenue S.E., Suite 205 Lacey, WA 98503 brad@wrra.com</p>	<p><input type="checkbox"/> Via Legal Messenger <input type="checkbox"/> Via Facsimile <input checked="" type="checkbox"/> Via U.S. Mail <input checked="" type="checkbox"/> Via Email</p>
<p><i>Attorney for Washington Refuse and Recycling Association</i> James R. Sells Ryan Sells Uptegraft Inc. PS 9675 Levin Road N.W., Suite 240 Silverdale, WA 98383-7620 jimsells@rsulaw.com</p>	<p><input type="checkbox"/> Via Legal Messenger <input type="checkbox"/> Via Facsimile <input checked="" type="checkbox"/> Via U.S. Mail <input checked="" type="checkbox"/> Via Email</p>
<p>Bronson Potter Deputy Prosecuting Attorney Clark County Prosecuting Attorney's Office Civil Division P.O. Box 5000 Vancouver, WA 98666-5000 bronson.potter@clark.wa.gov</p>	<p><input type="checkbox"/> Via Legal Messenger <input type="checkbox"/> Via Facsimile <input checked="" type="checkbox"/> Via U.S. Mail <input checked="" type="checkbox"/> Via Email</p>

DATED at Seattle, Washington, this 1st day of May, 2008.



Mary Newman, Legal Assistant