

BEFORE THE WASHINGTON  
UTILITIES AND TRANSPORTATION COMMISSION

IN THE MATTER OF DETERMINING THE  
PROPER CARRIER CLASSIFICATION OF,  
AND COMPLAINT FOR PENALTIES  
AGAINST

Case No.: TE-190828

COVER LETTER

vs.

MICHAEL S. MILLER, D/B/A  
TIGER MOUNTIAN SHUTTLE AND TIGER  
SHUTTLE

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UTIL. AND TRANSP.  
COMMISSION

PLEASE TAKE NOTICE that David A. Stirbis, of Liberty Law, L.L.C., appears herein on behalf of Michael S. Miller, et rux, et al, identified above. Our address is stated below. My email address is dave@libertylawattorney.com.

Attached and incorporated by reference are a Notice of Appearance and a Hearing Statement.

Dated this 9<sup>th</sup> day of December, 2019.

LIBERTY LAW, LLC

s/ David A. Stirbis  
David A. Stirbis WSBA#26037  
Attorney for Respondent

LIBERTY LAW, L.L.C.  
6108 Community Place SW, Ste. 1  
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COVER LETTER

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vs.

MICHAEL S. MILLER, D/B/A  
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SHUTTLE

PLEASE TAKE NOTICE that David A. Stirbis, of Liberty Law, L.L.C., appears herein on behalf of all of the defendants, identified above, and requests that all further papers and pleadings herein, except original process, be served upon the undersigned attorney at the address below stated.

Dated this 6<sup>th</sup> day of December, 2019.

LIBERTY LAW, LLC

s/ David A. Stirbis  
David A. Stirbis WSBA#26037  
Attorney for Respondent

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Case No.: TE-190828

RESPONDENT'S HEARING STATEMENT,  
WITNESS AND EXHIBIT LIST

vs.

MICHAEL S. MILLER, D/B/A  
TIGER MOUNTIAN SHUTTLE AND TIGER  
SHUTTLE

COMES NOW, the Respondent, by and through counsel of record, David A. Stirbis, of Liberty Law, L.L.C., and hereby submits the following hearing statement, witness and exhibit list, supported by the files and records contained herein.

I. HEARING STATEMENT

The Respondent is a small business owner that operates a shuttle business primarily for the benefit of paraglider pilots flying from Tiger Mountain located south of Issaquah, Washington.

The shuttle provides a unique service that allows paraglider pilots to take a short shuttle ride of approximately thirty minutes to the top of the hill as opposed to a one-hour hike with thirty to fifty pounds of gear.

Additionally, the shuttle allows new students to experience tandem flights with an instructor under the guidelines of United States FAR part 103 ultralight flight rules to gain the necessary experience to eventually obtain a license from the United States Hangliding and

Paragliding Association. Due to its size and weight, it is impractical to hike tandem gear up the trail to the top of Tiger Mountain.

Mr. Miller is the primary source of income for his family of four. While Mr. Miller is diagnosed with cerebral palsy, he confronts his disability by working at this endeavor and as a driver for Uber and Lyft to make ends meet for his family.

Mr. Miller requests the court not impose a fine or penalty for alleged violations of and allow him time to obtain an UTC.

## II. WITNESS LIST

The respondent will present the following witnesses at the hearing.

1. Michael Miller. Mr. Miller is the respondent and will testify about the measures he has undertaken to obtain a certificate and operate the Tiger Mountain Shuttle in compliance with state and local laws.
2. Marc Chiroco. Mr. Chiroco is a principal of Seattle Paragliding and will testify about his assistance in helping Mr. Miller obtain his certificate and comply with state and local laws regarding the operation of the Tiger Mountain Shuttle.
3. Ian Frew. Mr. Frew is the current president of the Northwest Paragliding Club. He will testify about the club's efforts to assist in complying with state and local laws regarding the operation of the Tiger Mountain Shuttle.
4. Thomas Allen. Mr. Allen is a member of the Northwest Paragliding Club. He will testify about his efforts in assisting Mr. Miller in running the Tiger Mountain Shuttle.

## III. EXHIBIT LIST

1. UTC Application;
2. Insurance Declaration Page;

Dated this 6<sup>th</sup> day of December, 2019.

LIBERTY LAW, LLC

s/ David A. Stirbis  
David A. Stirbis WSBA#26037  
Attorney for Respondent



TRANSMISSION VERIFICATION REPORT

TIME : 12/06/2019 02:07PM  
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