

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

SANDY JUDD and TARA HERIVEL,

Complainants,

v.

**AT&T COMMUNICATIONS OF THE
PACIFIC NORTHWEST, INC. and T-
NETIX, INC.,**

Respondents.

Docket No. UT-042022

**AT&T'S MOTION FOR LEAVE TO FILE A REPLY TO
COMPLAINANTS' RESPONSE TO T-NETIX'S MOTION TO STRIKE**

Respondent AT&T Communications of the Pacific Northwest, Inc. ("AT&T"), by and through its attorneys, respectfully submits this Motion for Leave to File a Reply to Complainants' Response to T-Netix's Motion to Strike. In support of this Motion, AT&T states the following:

1. On October 6, 2010, the Commission issued Bench Request No. 7 to the parties. Complainants filed their Response to Bench Request No. 7 on October 20, 2010. T-Netix filed a Motion to Strike and/or Exclude Exhibit A to Complainants' Response on October 27, 2010. Complainants filed their Response to T-Netix's Motion to Strike on November 3, 2010.

2. The Motion to Strike, the exhibit sought to be stricken, and Complainants' Response to the Motion all implicate and affect AT&T's interests. Complainants' Response to T-Netix's Motion to Strike seeks to introduce evidence regarding a purported "putative class member" prior to consideration of class certification by the Superior Court and misinterprets Bench Request No. 7.

3. AT&T respectfully requests leave to file a four-page Reply addressing Complainants' Response to T-Netix's Motion to Strike and/or Exclude Exhibit A. AT&T's Reply will focus on Complainants' attempt to introduce evidence from a non-party and their misinterpretation of Bench Request No. 7. AT&T's Reply is attached hereto as Exhibit 1.

WHEREFORE, AT&T respectfully requests leave to file the Reply to Complainants' Response to T-Netix's Motion to Strike, attached as Exhibit 1 to this Motion for Leave.

Dated: November 10, 2010

SUBMITTED BY:

**AT&T COMMUNICATIONS OF
THE PACIFIC NORTHWEST, INC.**

By: /s/ Charles H.R. Peters

Letty S.D. Friesen
AT&T Services, Inc.
2535 E. 40th Avenue
Ste. B1201
Denver, CO 80205
(303) 299-5708
(303) 298-6301 (fax)
lf2562@att.com

Charles H.R. Peters
David C. Scott
Douglas G. Snodgrass
SCHIFF HARDIN, LLP
233 S. Wacker Dr.
Chicago, IL 60606
(312) 258-5500
(312) 258-5600 (fax)
cpeters@schiffhardin.com
dscott@schiffhardin.com
dsnodgrass@schiffhardin.com

Cynthia Manheim
AT&T Services, Inc.
PO Box 97061
Redmond, WA 98073
(425) 580-8112
(425) 580-6245 (fax)
cindy.manheim@att.com

CERTIFICATE OF SERVICE

Pursuant to WAC 480-07-150, I hereby certify that I have this day, November 10, 2010, served this document upon all parties of record by e-mail and Federal Express overnight delivery at the e-mail addresses and mailing addresses listed below:

Stephanie A. Joyce
Arent Fox LLP
1050 Connecticut Avenue, NW
Washington, DC 20036
joyce.stephanie@arentfox.com

Arthur A. Butler
Ater Wynne LLP
601 Union Street, Suite 1501
Seattle, WA 98101-2341
aab@aterwynne.com

Chris R. Youtz
Richard E. Spoonemore
Sirianni Youtz Meier & Spoonemore
719 Second Avenue, Suite 1100
Seattle, WA 98104
cyoutz@sylaw.com
rspoonemore@sylaw.com

Pursuant to WAC 480-07-145, I further certify that I have this day, November 10, 2010, filed MS Word and PDF versions of this document by e-mail, and twelve copies of this document by Federal Express, with the WUTC at the e-mail address and mailing address listed below:

Mr. David W. Danner
Secretary and Executive Director
Washington Utilities and Transportation Commission
1300 S. Evergreen Park Drive SW
PO Box 47250
Olympia, WA 98504-7250
records@utc.wa.gov

Pursuant to the Prehearing Conference Order 08 and Bench Request Nos. 5 & 6, I further certify that I have this day, November 10, 2010, provided a courtesy copy of this document, in MS Word, to ALJ Friedlander by e-mail at the following e-mail address: mfriedla@utc.wa.gov.

Dated: November 10, 2010

/s/ Charles H.R. Peters

Charles H.R. Peters