DAVIS GRIMM PAYNE & MARRA

Attorneys at Law

ANDREW D. SHAFER ashafer@davisgrimmpayne.com 206.447.0182 206.622.9927 (fax)

701 FIFTH AVENUE SUITE 4040 SEATTLE, WASHINGTON 98104

December 11, 2006

Theodora Mace, Administrative Law Judge Washington Utilities & Transportation Commission PO Box 47250 Olympia, WA 98504-7250

Re: V

Western Van Lines v. Western Moving & Storage

Docket No. TV-061577

Dear Judge Mace:

Enclosed is Stipulation Setting Complaint For Violation of WAC 480-15-390 in the above referenced matter, signed by counsel for the parties. Please call me or Andy Shafer with any questions.

Very truly yours,

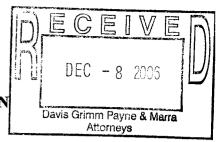
Marcia Gay, Legal Assistant

to Andrew D. Shafer

Enclosure

ATTN: ANDREW Slagen.

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION



WESTERN VAN LINES, INC.,	
d/b/a WESTERN VAN & STORAGE,) DOCKET TV-061577
Complainant,)
) STIPULATION SETTLING COMPLAINT
V.) FOR VIOLATION OF WAC 480-15-390
WESTERN MOVING & STORAGE, INC.,)))
Respondent.)
)

This stipulation for settlement is executed as of this 6th day of December, 2006 between Western Van Lines, Inc., Complainant by and through its attorneys, Davis Grimm Payne & Marra, and Andrew D. Shafer and Western Moving & Storage, Inc., Respondent, by and through its president and sole stockholder, Robert Irwin.

Respondent admits the allegations contained in the complaint filed in this case. Based upon the allegations in the complaint, Respondent stipulates to the Commission entering an order granting the relief requested by the Complainant as follows:

- 1. Not later than December 31, 2006, Respondent shall change its corporate name, by amending its articles of incorporation, to one that is not deceptively similar to that of Complainant. Without limiting the generality of the foregoing, Respondent shall not incorporate the word "Western" or any confusingly similar derivative thereof, in its corporate and trade names.
- 2. Respondent shall not use any trade name or adopt any common law or statutory trademark that incorporates or uses the word "Western" or any confusingly similar derivative thereof.

3. Not later than December 31, 2006, Respondent shall change the URL of its

Internet Web Site, which URL currently is www.westernmovingandstorage.com to one which

does not incorporate the word "Western" or any confusingly similar derivative thereof in its

URL.

4. Commencing January 1, 2007, Respondent shall not use the word "Western" or

any confusingly similar derivative thereof, in any Yellow Pages or trade directory advertisements

or on any Internet Web Site.

5. Not later than December 31, 2006, Respondent shall furnish to the Complainant

and to the Commission evidence that it has taken the steps required by Paragraphs 1 through 3

above.

6. In the event Respondent fails to take the actions required by Paragraphs 1 through

3 and 5 above, by the deadlines stated, the Commission shall enter forthwith a cease and desist

order prohibiting the Respondent from offering or providing moving and storage services

pursuant to its Permit HG 61024.

7. In the event Respondent breaches its undertaking under paragraph 4 above, the

Commission shall issue an order to show cause why it should not issue a cease and desist order

prohibiting Respondent from engaging in motor carrier operations under its permit HG 061024.

8. The parties stipulate to the Commission entering a final order incorporating the

terms of this stipulation as set forth in paragraphs 1 through 7 above.

WESTERN VAN LINES, INC.

WESTERN MOVING & STORAGE, INC.

12-6-06

DAVIS GRIMM PAYNE & MARKA

By: Andrew D. Shafer, WSBA No. 9405,

Attorney for Complainant

Robert Irwin, President