

Exhibit MH-01
to Declaration of
Michael Howell

NEED HELP
GETTING THIS HOME?

dolly

Truck & Muscle, Anytime You Need It

Schedule your Dolly & meet your Helper*
— as soon as 90 mins from now!

*Member must be present for purchase and pick up.
Warehouse is unable to hold product.

DOLLY.COM



Exclusive Offer for New Customers
with orders in next 30 days

Payment method of
Cash \$60 Online Cash Card

APPROPRIATE INFORMATION DISCLOSURE
THE BRATTLE CITY FINANCIAL SERVICES TAX
FORM 1099-INT

These items are also available at our
Retail and Wholesale locations within
City of Brattleboro
Beverage Tax
(Additional Beverage Recovery Fee)

Taxable Order
\$100.00 - \$100.00 Taxable \$0.00
Beverage Order
\$100.00 - \$100.00 Taxable \$0.00

Brattleboro Reg. & Billing

Checklist

Office



Exhibit MH-02
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Get delivery when YOU want it!
Pick ups in as little as 90 mins.
Here's how:

1. Download the Dolly app (Available on iOS or go to www.dolly.com)
2. Add an address where you want your goods delivered.
3. Dolly will match you with a driver.
4. Meet your driver at the pick up time.

Member must be present for purchase & pick up. Warehouse is unable to hold product.

DOLLY.COM

NEED HELP GETTING THIS HOME?

dolly

Truck & More. Anytime You Need It.

Schedule your Dolly & meet your hauler! — as soon as 90 mins from now!
Member must be present for purchase and pick up. Warehouse is unable to hold product.

DOLLY.COM

20000
PORTER CABLE
WETRY VACUUM
4 GAL LITERS
29.99

122012
LITRE HOTTES
HAND WARMERS 40 COUNT
9.99

2917078
PRESTO
HEATDISH
PARABOLIC HEATER
59.99

1140842
NEXT
WiFi SMART THERMOSTAT
219.99

CABLE PORTER + CABLE PORTER + CABLE

STAINLESS STEEL
WETRY VACUUM
4.0 4.0 15

4.0 4.0 15

HOMEDARECA
ASPIRADORA DE
ACERO INOXIDABLE

PRESTO HeatDish

PARABOLIC ELECTRIC HEATER

FEELS LIKE 3 TIMES THE HEAT!

VERTICALLY INSTANT HEAT
Powerful infrared heaters heat fast & evenly, and accommodate 17 angles. No need to heat the entire room.

SAVES ENERGY
Uses only 1000 watts versus the 1500 watts used by a standard space heater.

ADJUSTABLE CONTROL
Adjusts range of settings.

Remotely controlled
Remotely controlled for added convenience.

SAVES SPACE
Compact design fits in tight spaces.

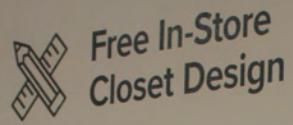
7357

SEE IT ALL

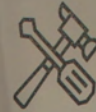


Exhibit MH-03
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OUR SERVICES



Free In-Store
Closet Design



Professional
Closet Installation



In-Home
Closet Design



In-Home
Organizing



Special Financing
Available*

*Subject to credit approval



Delivery
by **dolly**

Special Financing
Available
with The Container Store
Credit Card

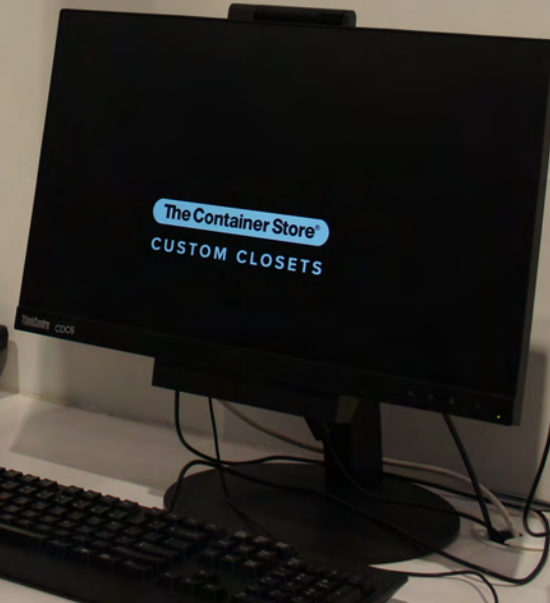


Exhibit MH-04
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dolly
DELIVERY

1ST ITEM

\$59

+\$15 per each additional item

Haul Away for \$15/item + applicable disposal fees.

DOLLY.COM



Neither Dolly nor its drivers/Helpers are affiliated with or endorsed by Big Lots. By using Dolly, you acknowledge and agree that Big Lots Stores, Inc. and its affiliates are not responsible and will not be liable for the delivery of your items, or any loss or damage to you, your items, or any other person or property. Rate valid within local Dolly service area only (see map).

Exhibit MH-05
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EASY TO PAY TAKE HOME TODAY

**NO INTEREST
IF PAID IN FULL
WITHIN 12 MONTHS**

Interest on the variable purchase rate of 29.99% will be charged to your account from the date of purchase if the promotional purchase is not paid in full within the 12 months or if you make a late payment. Required minimum purchase of \$150*



**\$49 INITIAL PAYMENT
LEASE TO OWN
NO CREDIT NEEDED***



*The advertised service is a rental-to-own program agreement for in-appliance services. In accordance with the agreement, a financing arrangement is made. Agreement will be determined by the credit review of the credit line and the history of the customer. You will not see the lease agreement or credit review until you make a 12 month payment of \$49.00. Lease-to-own program is not available in CA, TX, NY, IL, and WA.



**DELIVERY BY DOLLY
ON YOUR SCHEDULE, STARTING IN
AS LITTLE AS 90 MINUTES**



3 YEAR FURNITURE PROTECTION PLAN

AS ADVERTISED
\$299

\$399

Exhibit MH-06
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GET YOUR NEW
FURNITURE HOME

with **dolly**

THE MOVE ANYTHING APP

SAME DAY DELIVERY

Fast. Easy. Affordable.

Ask a sales associate for more info.

DOLLY IS NOT AFFILIATED WITH OR ENDORSED BY COSTCO AND SAMUEL.

More great furniture
deals ahead.



**Exhibit MH-07
to Declaration of
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For your Convenience
We will open another register if there are three people in line

Para su comodidad
abriremos otra caja registradora si hay más de tres personas en línea

ASK FOR 5% OFF WHEN YOU USE LOWE'S BUSINESS CREDIT

Haga su solicitud hoy
Solicite un 5% de descuento* cuando utilice el crédito comercial de Lowe's

EXIT

RETURN POLICY
Política de devoluciones

LOW PRICES

DELIVERY
WHEN YOU WANT IT
(EVEN TODAY!)

dolly
Your Move Anything App

Available on the App Store and Google Play

Batteries

REGISTER

EMERGENCY EXIT ONLY

Exhibit MH-08
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WELCOME

Bienvenidos



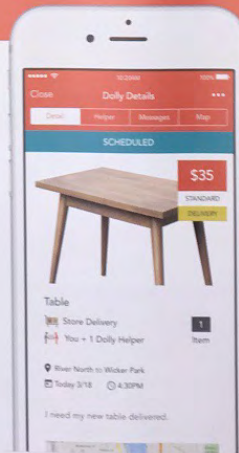
ENTER
Entrada



DELIVERY
WHEN YOU WANT IT
(EVEN TODAY!)

dolly

Your Move Anything App



Download on the
App Store

GET IT ON
Google play

dolly.com/download

Exhibit MH-09
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Come grow with us.
Crecer con nosotros.
Lowe.com / Careers



A great place to work.
Un gran lugar para trabajar.
Lowe.com / Careers

Our promise.
Nuestra promesa.

Customer Service



DELIVERY
WHEN YOU WANT IT
(EVEN TODAY!)



Your Move Anything App

DELIVERY WHEN YOU WANT IT
dolly
Download on the App Store
GET IT ON Google play
dolly.com/download

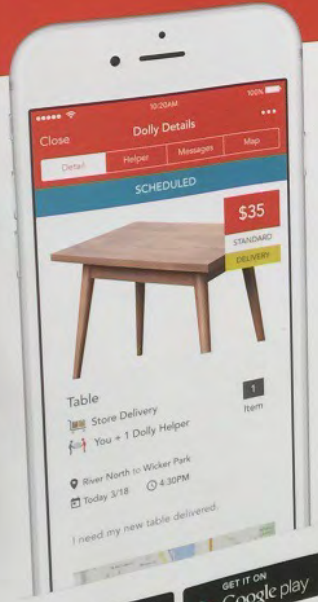


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Facebook Marketplace Promotion

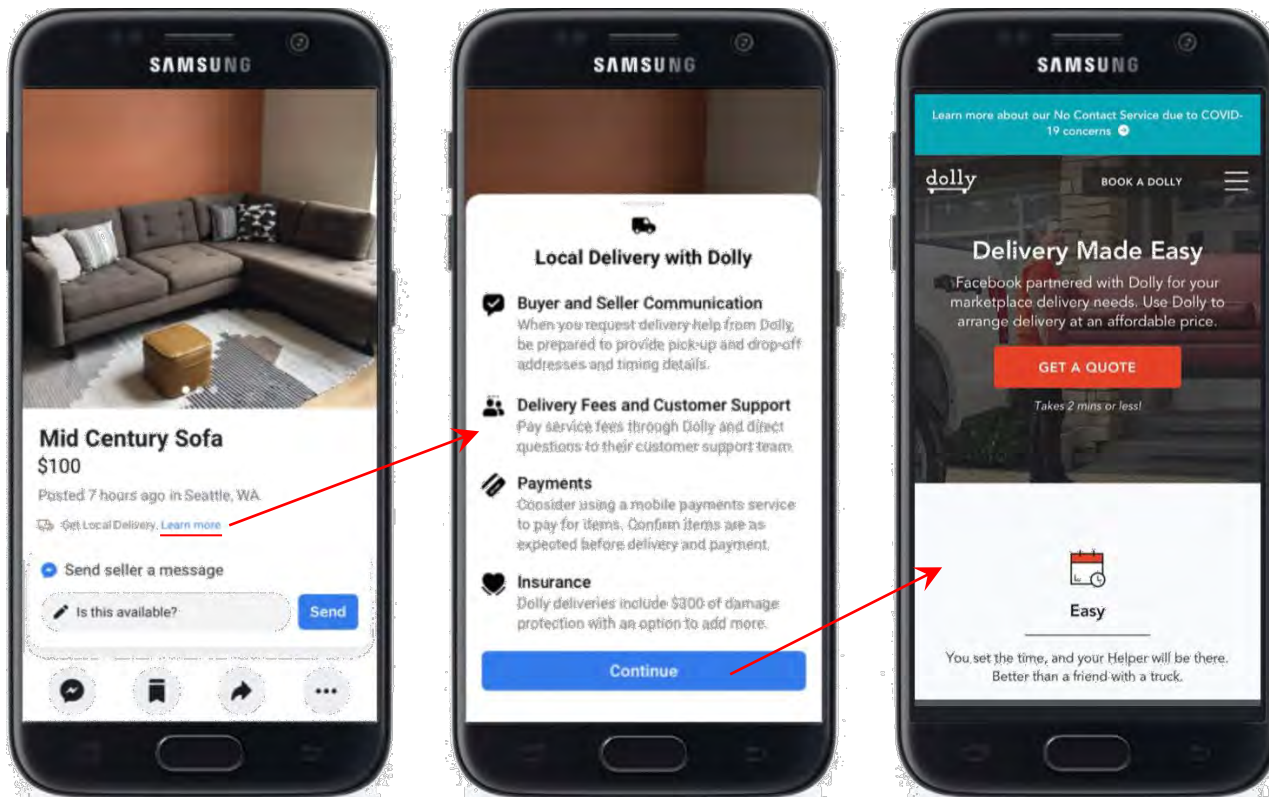


Exhibit MH-11
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STATE OF WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION

621 Woodland Square Loop S.E. • Lacey, Washington 98503

P.O. Box 47250 • Olympia, Washington 98504-7250

(360) 664-1160 • TTY (360) 586-8203

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UTIL. AND TRANSP.
COMMISSION

Via Electronic Mail Only

September 9, 2019

Mark L. Johnson, Executive Director and Secretary
Washington Utilities and Transportation Commission
621 Woodland Square Loop S.E.
P.O. Box 47250
Olympia, Washington 98504-7250

Re: *Staff Response to Company Petition for Exemption from WAC 480-14-250(1)(e)*
Docket TV-190594

Dear Mr. Johnson:

On August 21, 2019, the Washington Utilities and Transportation Commission (“Commission”) received Dolly, Inc.’s (“Dolly” or “Company”) Petition for Exemption from Washington Administrative Code (“WAC”) Section 480-14-250(1)(e) (“CC Exemption Petition”), in conjunction with its concurrently filed application for a permit as a common carrier of property (excluding household goods) filed in Docket TV-190594. By this letter, Commission Staff (“Staff”) responds to the Company’s CC Exemption Petition.¹

The Commission may grant an exemption from its rules “when doing so is consistent with the public interest, the purposes underlying regulation, and applicable statutes.”²

It is Staff’s position that the Company must, in addition to its current petition for exemption from WAC 480-14-250(1)(e), file a petition for exemption from WAC 480-14-250(1) because, as explained further below, it seeks to engage two surplus lines insurance carriers that are not admitted with the Office of the Insurance Commissioner (“OIC”) through its insurance brokerage company JMB Insurance Agency, Inc., SLA # 202 (“JMB”) to manage and maintain the Company’s commercial general liability and auto liability insurance policies. If the Company were to petition for this additional exemption, Staff would recommend that the Commission

¹ Staff hereby reserves the right to revise and/or supplement its recommendation should additional information become available, for example, in the event that this matter proceeds to an adjudication.

² WAC 480-15-035(1).

grant the so-amended CC Exemption Petition,³ subject necessarily to the Company's prior affirmative acceptance of the following conditions:

- (1) The Company obtains insurance from a highly-rated non-admitted company authorized by the OIC to issue surplus lines insurance (A.M. Best A- or above rating); and,
- (2) The Company allows only persons or entities whose common carrier permit(s) Dolly has verified, to transport property pursuant to a bid generated by Dolly.⁴

WAC 480-14-250(1), requires each common carrier and each applicant for common carrier authority to file with the Commission evidence of currently effective liability and property damage insurance, written by a company authorized to write such insurance in the state of Washington. WAC 480-14-250(1)(e) requires carriers to submit evidence of insurance by submitting a Uniform Motor Carrier Bodily Injury and Property Damage Liability Certificate of Insurance ("Form E") within 60 days.

It is Staff's position that the Company must petition for exemptions from both WAC 480-14-250(1) and (1)(e) so that it can engage JMB to manage and maintain its commercial general liability and auto liability policies with two surplus lines insurance carriers who are not admitted with the OIC.⁵ Surplus lines insurance is used when licensed insurers in the standard market will not provide coverage because the risk is too high, too unique, too unfamiliar, or does not otherwise meet the insurer's guidelines. Surplus lines insurers have greater flexibility to design and price their insurance policies, and generally charge higher premiums because they insure risks that are usually more costly to cover.

Dolly's insurance broker, JMB, is registered with the OIC and is authorized to write surplus lines insurance on behalf of the two surplus lines insurers Dolly seeks to engage—James River Insurance Company (for commercial general liability) and First Mercury Insurance Company (for auto liability). Both companies are "non-admitted" insurers with the OIC and both are

³ In providing its recommendation, Staff in no way agrees with the Company that WAC 480-14-250(1)(e) imposes an undue hardship on the Company different from hardships imposed on other similarly situated persons, or that applying the rule to the Company would be contrary to the underlying purposes of the rule and the public interest. Furthermore, Staff's statements and/or recommendations in this response in no way pertain to the Company's pending application for operating authority as a carrier of household goods and/or any exemption petitions relating to that application, which were also filed and are presently pending in Docket TV-190594.

⁴ RCW 81.80.070(1) provides that any "common carrier, contract carrier, or temporary carrier shall not operate for the transportation of property for compensation in this state without first obtaining from the commission a permit for such operation."

⁵ RCW 81.80.190 requires "carriers to either procure and file liability and property damage insurance from a company licensed to write such insurance in the state of Washington, or deposit security, for the limits of liability and on terms and conditions that the commission determines are necessary for the reasonable protection of the public against damage and injury for which the carrier may be liable by reason of the operation of any motor vehicle." The Company must purchase its insurance from a company licensed in the state of Washington. The OIC authorizes insurance companies to write insurance in Washington. Washington law permits the use of surplus lines insurance coverage, under certain conditions, if insurance from authorized insurers cannot be procured. The licensing requirements for surplus lines brokers are enumerated at RCW 48.15.070.

members of the Surplus Lines Associates of Washington. Both companies have an A (excellent) financial strength rating based on the A.M. Best Rating Services credit ratings.

The Company asserts that it requires its helpers to provide evidence of auto liability insurance coverage prior to using its platform.⁶ The Company asserts that the helper's insurance covers losses that occur while transporting customer property.⁷ The Company asserts that its commercial general liability and auto liability coverage are contingent and supplement the helper's coverage.⁸ If a helper's insurance does not cover a claim, the Company asserts that one of Dolly's contingent policies steps in to cover the loss.⁹

The Federal Motor Carrier Safety Administration accepts surplus lines insurance (*see* CFR Title 49 Part 387.315) for interstate motor carriers. The purpose of the insurance rule is to protect the public from loss or damage caused by the Company while providing service. Surplus lines insurance responds to that need and is a viable option for high-risk or unique lines of business where risk is less certain. Accordingly, Staff finds that the CC Exemption Petition may be consistent with the public interest, the purposes underlying regulation, and applicable statutes, so long as the Company first and unequivocally accepts the above-specified conditions as a prerequisite to the issuance of a common carrier permit to the Company.

Sincerely,

/s/ Mathew Perkinson

Mathew Perkinson

Assistant Director, Transportation Safety

⁶ CC Exemption Petition at 2:22-23.

⁷ *Id.* at 2:23-24.

⁸ *Id.* at 2:25-26.

⁹ *Id.* at 2:26-3:1.