

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

BEFORE THE WASHINGTON STATE

UTILITIES AND TRANSPORTATION COMMISSION HEARINGS BOARD

CITY OF SPOKANE VALLEY, a municipal corporation,

Complainant,

vs.

UNION PACIFIC RAILROAD COMPANY (aka UPRR),

Respondent.

No. TR-210814; 210809

NOTICE OF APPEARANCE PURSUANT TO WAC 480-07-345

TO: THE COMMISSION SECRETARY;

AND TO: ALL PARTIES OF RECORD AND THEIR COUNSEL.

YOU, AND EACH OF YOU, will please take notice that the appearance of Respondent UNION PACIFIC RAILROAD COMPANY (aka UPRR) is hereby entered in the above-entitled action through the undersigned attorneys, without waiving its right to challenge the Commission’s jurisdiction and service of process, and all other defenses.

////

////

1 You are hereby directed to serve all future pleadings or papers, except process, upon the
2 said attorneys at their office below stated.

3
4 DATED this 22nd day of November, 2021 LEWIS BRISBOIS BISGAARD & SMITH LLP

5
6 By: /s/ Rachel Tallon Reynolds
7 Rachel Tallon Reynolds, WSBA #38750
8 Jean Y. Kang, WSBA #42074
9 1111 Third Avenue, Suite 2700
10 Seattle, Washington 98101
11 (206) 436-2020
12 Rachel.Reynolds@lewisbrisbois.com
13 Jean.Kang@lewisbrisbois.com
14 Attorneys for Respondent
15
16
17
18
19
20
21
22
23
24
25

1 **DECLARATION OF SERVICE**

2 I hereby declare under penalty of perjury under the laws of the State of Washington that I
3 caused a true and correct copy of the foregoing to be served via the methods below on this 22nd
4 day of November, 2021 on the following counsel/party of record:

5 Kenneth W. Harper 6 MENKE JACKSON BEYER, LLP 7 807 N. 39 th Avenue 8 Yakima, WA 98902 9 Phone: (509) 575-0313 10 Email: kharper@mjbe.com 11 <i>Attorneys for City of Spokane Valley</i>	<input type="checkbox"/> via U.S. Mail, first class, postage prepaid <input type="checkbox"/> via Legal Messenger Hand Delivery <input type="checkbox"/> via Facsimile <input checked="" type="checkbox"/> via E-mail:
12 Washington Utilities & Transportation 13 Commission	<input checked="" type="checkbox"/> efiling.utc.wa.gov/form

14
15
16
17
18
19
20
21
22
23
24
25
/s/ Elizabeth Pina
Elizabeth Pina, Legal Assistant
Elizabeth.Pina@lewisbrisbois.com