

# SNELL & WILMER

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May 27, 2025

**Via E-Filing**

Jeff Killip, Executive Director and Secretary  
Washington Utilities and Transportation Commission

Re: **Urgent** Petition to Challenge Application for Permit – Docket Number 250286  
Infringement of NORTHSTAR MOVING® and NORTHSTAR MOVERS®  
By Applicant North Star Moving Inc. – Notice of Application May 27, 2025

Dear Mr. Killip:

Our firm represents NorthStar Moving Corporation and NorthStar Moving Holding Company (collectively hereafter, “NorthStar”). It has come to our attention that today, an entity infringing our client’s trade name and trademarks applied for a permit for North Star Moving Inc. On information and belief, this application is made in bad faith and must be denied.

NorthStar was founded in 1994 and is a well-known moving company that specializes in nationwide and international home moves (USDOT Number 1836576). It owns incontestable U.S. trademark registrations for NORTHSTAR MOVERS® (U.S. Registration Number 4,308,327) and NORTHSTAR MOVING® (U.S. Registration Number 4,002,155), in addition to registrations in Canada, Israel, the UK, the EU, and several additional registered and common-law trademarks and service marks. Information about our client is available here: <https://www.northstarmoving.com/>.

NorthStar has invested considerable time, effort, and expense in developing the goodwill associated with its brand and related services. By virtue of longstanding, continuous use in commerce, NorthStar has earned a reputation for quality and goodwill. Celebrity A-listers and prominent individuals such as actress Angelina Jolie, athlete Derek Fisher, singer-songwriter Diana Ross, and Israeli Prime Minister Benjamin Netanyahu, among dozens of others, have turned to NorthStar as their trusted source for quality moving services. Accordingly, NorthStar is committed to protecting its brand and rights.

This is not the first time an infringer has tried to profit from our client’s longstanding rights and goodwill. In fact, in 2021, NorthStar obtained a \$13 Million Dollar judgment and permanent injunction against an infringer in Florida who was likewise offering moving services under the NorthStar and North Star trademarks and trade names. A copy of the judgment is attached as **Exhibit A**.

We understand from others in the industry that the Washington Utilities and Transportation Commission is currently reviewing the application for permit submitted by Oleksandr Komov using the trade name Magic Moving and Delivery Services, requesting approval for an application for:

**North Star Moving Inc, under Docket Number 250286.**

The application must be denied. Granting the application of North Star Moving Inc would violate your Rules Relating to Household Goods Carriers, would harm and defraud the public, and would infringe upon our client's intellectual property rights.

- The Washington Administrative Code, under WAC 480-15-390, mandates that a carrier "not operate under a name that is similar to another carrier" unless certain conditions are met. Those conditions have not been met in this case—specifically:
  - Our client, NorthStar, has not given and would not give written permission to use the name North Star, or any confusingly similar name to the applicant; and
  - The UTC is on notice that granting the application would cause confusion and would violate NorthStar's rights. The UTC has not determined that "the use of the similar name will not mislead the shipping public or result in unfair or destructive competitive practices."
- The proposed carrier name North Star is **identical** to our client's name, NorthStar and infringes our client's federally registered trademarks covering identical and competing moving services. The applicant's actions constitute trademark infringement, false advertising, and unfair competition in violation of federal and state trademark law.
- The applicant is not acting in good faith because it has provided a false USDOT number. Indeed, the application under Docket Number 250286 includes the applicant's purported USDOT Number as 4337644. However, the U.S. Department of Transportation has no records of that number as shown in today's search histories provided below:

U.S. Department of Transportation  
Federal Motor Carrier Safety Administration  
Licensing and Insurance Public

Enter information for query. If you know the **USDOT Number** or **Docket Number**, that is all that needs to be entered. If you do not know the **USDOT Number** or **Docket Number**, you can search on any combination of **Legal Name**, **DBA Name (Doing-Business-As Name)**, or **State** to narrow the search. If searching by name please use a state to limit the search. The search always looks for a legal or DBA name which begins with the text entered. If the wild card character (\*) is the first position entered, the search will look for a legal or DBA name which contains the text entered, but this search will take longer.

→ No record found, please try different search parameters. For name searches use as little of the name as you are sure of.

USDOT Number: 4337644  
Docket Number: MC  
Legal Name:  
DBA Name:  
State: Select State/Country

2:31 PM  
5/27/2025

Passenger Carrier Search by Company or USDOT Number

4337644

Enter the Company Name or USDOT Number

Apply Reset

No records matched your search criteria.

U.S. DEPARTMENT OF TRANSPORTATION

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5/27/2025

Pursuant to notice and petition procedures, including but not limited to under the Revised Code of Washington, we ask that you deny the permit application for the carrier name North Star Moving Inc. *See, e.g.*, RCW 81.80.280 ("Permits may be canceled, suspended, altered, or amended by the commission upon complaint by any interested party . . . The commission may enjoin any person from any violation of this chapter, or any order, rule, or regulation made by the commission . . .").

We appreciate your anticipated cooperation. Nothing herein constitutes a waiver of any rights or remedies, all of which are reserved.

We look forward to your prompt response. I can be reached by telephone at (714) 427-7077 and by email at [dgubernick@swlaw.com](mailto:dgubernick@swlaw.com). Again, I look forward to your reply.

Sincerely,  
**Snell & Wilmer L.L.P.**

Deborah A. Gubernick

Enclosure: Copy of 2021 Trademark Infringement Judgment

cc: Lorilyn Huey, Forms and Records Analyst  
([Lorilyn.Huey@utc.wa.gov](mailto:Lorilyn.Huey@utc.wa.gov); [transportation@utc.wa.gov](mailto:transportation@utc.wa.gov))