

**Exh. SP-9  
Docket TV-180605  
Witness: Susie Paul**

**BEFORE THE WASHINGTON  
UTILITIES AND TRANSPORTATION COMMISSION**

**In re Application of**

**DOLLY, INC.**

**for a permit to operate as a motor carrier  
of household goods and a permit to  
operate as a motor freight common  
carrier**

**DOCKET TV-180605**

**EXHIBIT TO  
TESTIMONY OF**

**Susie Paul**

**STAFF OF  
WASHINGTON UTILITIES AND  
TRANSPORTATION COMMISSION**

*Dolly, Inc. Motion for Stay, Docket TV-171212*

**November 30, 2018**

**Attachment E**

**BEFORE THE WASHINGTON  
UTILITIES AND TRANSPORTATION COMMISSION**

In the Matter of

Determining the Proper Carrier Classification  
of, and Complaint for Penalties Against:

DOLLY, INC.

Docket No. TV-171212

MOTION TO STAY EFFECTIVENESS  
OF FINAL ORDER 04

1 Pursuant to RCW 34.05.467 and WAC 480-07-860, Dolly, Inc. (“Dolly”) respectfully  
files this motion to stay the effectiveness of Final Order Denying Petition for Administrative  
Review of Corrected Order 02 (“Order 04”).

2 Order 04 found that Dolly is classified as a household goods carrier, common carrier, and  
solid waste collection company; must immediately cease operating as a household goods carrier,  
common carrier, and solid waste collection company unless it obtains authority from the  
Commission; must clearly indicate in its web-based application on the Internet and in its  
advertising on Facebook, Twitter, Pinterest, and any other social media sites or other platforms it  
uses or has used to make its services known that it does not offer or perform services in the state  
of Washington as a household goods carrier, as a common carrier transporting property other  
than household goods, or as a solid waste hauler unless it obtains authority from the  
Commission; and assessed a penalty of \$69,000.00 which is suspended until June 19, 2019.

3 After receiving service of Order 04 Dolly contacted the Washington Utilities and  
Transportation Commission Staff (“Staff” or “Commission Staff”) to inquire about applying for

COVER LETTER  
MOTION TO STAY  
CERTIFICATE OF SERVICE  
DOCKET TV-171212

2 DOLLY, INC.  
600 FIFTH AVENUE, SUITE 600  
SEATTLE, WASHINGTON 98164-2086  
(206) 413-5312

household goods carrier, common carrier, and solid waste collection company permits to obtain

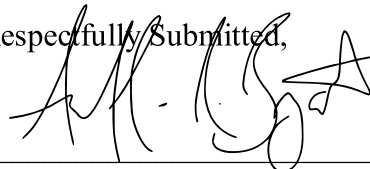
the above-referenced authority from the Commission.

4 Dolly files this motion to stay to allow Dolly and Commission Staff time to determine the appropriate process to complete the applications and for Commission Staff to determine a final disposition of those applications. For example, several Commission rules applicable to the permit process do not apply to Dolly but Dolly nevertheless must request an exemption from those rules in order to qualify for the applicable permit. Exemption from Commission rules is not automatically granted and requires Dolly to petition the Commission for exemption.

5 Order 04 becoming effective will cause Dolly irreparable harm as the cease and desist provisions requires Dolly to permanently refrain from making its services known to consumers and refrain from providing those services. Additionally, Dolly's applications to obtain Commission authority to operate comply with the terms of the cease and desist orders. Both Commission Staff and Dolly should be permitted time to process those applications and for the Commission to rule on Dolly's petitions for exemption from relevant and applicable Commission permitting rules.

DATED this 29<sup>th</sup> day of May, 2018.

Respectfully Submitted,



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