## BEFORE THE WASHINGTON STATE

## UTILITIES AND TRANSPORTATION COMMISSION HEARINGS BOARD

SPOKANE COUNTY, a political subdivision of the State of Washington,

No. TR-210257

Complainant,

STIPULATED MOTION FOR CONTINUANCE OF DEADLINE TO FORMALLY RESPOND TO COMPLAINT

VS.

UNION PACIFIC RAILROAD COMPANY (aka UPRR),

Respondent.

Respondent Union Pacific Railroad Company ("UPRR"), by and through undersigned counsel, hereby appears in this matter and respectfully requests a continuance of the deadline to respond to Complainant Spokane County's Complaint. The parties are currently engaged in substantive resolution negotiations and believe that a continuance would best serve the interests of both the parties and the Commission. Counsel for Spokane County has stipulated to a ten-day extension for the purpose of completing negotiations. Accordingly, the parties respectfully request the Commission extend the deadline for UPRR to respond to Spokane County's Complaint by ten days, making the new deadline May 20, 2021.

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DATED this 10th day of May, 2021 1 2 3 By: Michael A. Nelson, WSBA #13789 4 Deputy County Prosecuting Attorney 5 1115 W. Broadway Avenue Spokane, Washington 99260 6 (509) 477-5764 mnelson@spokanecounty.org 7 Attorney for Spokane County 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26

LEWIS BRISBOIS BISGAARD & SMITH LLP

Packel Tallon Daymolds

By:

Rachel Tallon Reynolds, WSBA #38750 Richard A. Meadows, WSBA #57552 1111 Third Avenue, Suite 2700 Seattle, Washington 98101 (206) 436-2020 Rachel.Reynolds@lewisbrisbois.com

Richard.Meadows@lewisbrisbois.com Attorneys for Respondent

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## **DECLARATION OF SERVICE**

I hereby declare under penalty of perjury under the laws of the State of Washington that I caused a true and correct copy of the foregoing to be served via the methods below on this 10<sup>th</sup> day of May, 2021 on the following counsel/party of record:

Michael A. Nelson, WSBA #13789
SPOKANE COUNTY
PROSECUTING ATTORNEY
1115 West Broadway Avenue
Spokane, WA 99260
(509) 477-5764

via U.S. Mail, first class, postage prepaid via Legal Messenger Hand Delivery via Facsimile

× via E-mail: mnelson@spokanecounty.org

Attorney for Complainant

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Elizabeth Pina, Legal Assistant Elizabeth.Pina@lewisbrisbois.com

/s/ Elizabeth Pina