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July 9, 2020

SENT VIA WEB PORTAL

Mark L. Johnson
Executive Director and Secretary
Washington Utilities and Transportation Commission
621 Woodland Square Loop SE
Lacey, WA 98503

Re: *In the Matter of Determining the Proper Carrier Classification of, and Complaint for Penalties Against Lugg. Inc.*, Docket TV-200029

Dear Mr. Johnson:

Enclosed for filing in the above-referenced docket are Public Counsel's Motion to Invoke Discovery Rules, and the Certificate of Service.

Sincerely,

/s/ *Ann Paisner*
ANN N.H. PAISNER, WSBA No. 50202
Assistant Attorney General
Public Counsel Unit
(206) 521-3211

AP/CM
Enclosures
cc: Service List (via E-mail Only)

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07/09/20 15:41
State Of WASH.
UTIL. AND TRANSP.
COMMISSION

CERTIFICATE OF SERVICE


DOCKET TV-200029

Lugg, Inc. Complaint

I HEREBY CERTIFY that I have this day served *Motion to Invoke Discovery* upon all parties of record in this proceeding, by electronic transmission to the email address(es) or I caused to be mailed a true and correct copy, postage prepaid, to each party or party representative listed in the Commission's master service list for this docket.

COMMISSION STAFF: Jeff Roberson Daniel Teimouri Office of the Attorney General Utilities & Transportation Division P.O. Box 40128 Olympia, WA 98504-0128 Jeff.Roberson@utc.wa.gov Daniel.Teimouri@utc.wa.gov	LUGG, INC.: Jordan Brown Lugg, Inc. 251 Little Falls Drive Wilmington, DE jordan@lugg.com
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Dated at Seattle, Washington this 9th day of July, 2020.

/s/ 
CHANDA MAK
Legal Assistant