

EXHIBIT C

DTG Enterprises, Inc.'s Motion for Continuance

(Docket TG- 240761– June 17, 2025)

From: [Gafken, Lisa \(ATG\)](#)
To: [Olson, Stephanie \(SEA\)](#); [Stratford, Karen E. \(ATG\)](#); [O'Neill, Tad Guy \(ATG\)](#); [Sykes, Robert \(ATG\)](#); [ATG MI PCC Sea EF](#); [Hartman, Brice C \(ATG\)](#); ["jessica.johanson.kubin@atg.wa.gov"](#); [Johanson-Kubin, Jessica \(ATG\)](#); [de Villiers, Stefan \(ATG\)](#); [Dreyer, Jean Marie \(ATG\)](#); [Moriyasu, Callahan \(ATG\)](#); [Martin, Jean \(ATG\)](#); [DeMarco, Elizabeth M \(ATG\)](#); [Roth, Jeanne \(ATG\)](#); ["mlamb@carneylaw.com"](#); ["rjohnson@lukins.com"](#); ["ttodorovakelly@lukins.com"](#); ["dwiley@williamskastner.com"](#); ["mhoward@williamskastner.com"](#); ["Rod Whittaker"](#)
Cc: [Perez, David A. \(SEA\)](#); [Steele, David S. \(BEL\)](#); [Hawley, Jonathan \(SEA\)](#)
Subject: RE: (DTG / UTC) TG-240761 - Request for Continuance of Evidentiary Hearing
Date: Wednesday, June 4, 2025 9:35:16 AM
Attachments: [image001.png](#)

Regarding DTG's proposed deposition of Staff witness McPherson, Staff is available on the following dates:

July 8 afternoon only,
July 14, or
July 16.

Lisa W. Gafken
Assistant Attorney General
Utilities and Transportation Division
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Subject: RE: (DTG / UTC) TG-240761 - Request for Continuance of Evidentiary Hearing

Correcting email addresses for Reid Johnson and Jessica Johanson-Kubin. Reid and Jessica,

please see the email string below.

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Subject: RE: (DTG / UTC) TG-240761 - Request for Continuance of Evidentiary Hearing

Hi Stephanie,

I appreciate the need to move the response testimony date, and Staff is open to modifying other dates in the procedural schedule. I do not agree that Staff's 3-week extension warrants a 6-week extension to the testimony deadline. Staff would agree to a 3-week extension, which places DTG in the same position as it would have been if we were able to respond to the discovery on the initial due date. Instead of applying a straight 3-week extension to the other deadlines, we think more modest extensions would be fine to the settlement conference and rebuttal/cross-answering deadlines. Staff's proposed schedule that incorporates a 3-week extension for DTG is set forth below.

Event	Current Schedule	Revised Schedule	3 week proposal
<i>Staff's responses to DTG's discovery</i>	<i>June 5, 2025</i>	<i>June 26, 2025</i>	<i>June 26, 2025</i>

<i>requests</i>			
Response testimony	June 30, 2025	August 11, 2025	July 21, 2025 (3 weeks)
Settlement conference	August 18, 2025	September 29, 2025	August 29, 2025 (almost 2 weeks)
Rebuttal and cross-answering testimony	October 1, 2025	November 12, 2025	October 8, 2025 (1 week; 11 weeks from response)
Discovery deadline	October 31, 2025	December 22, 2025	December 22, 2025
Cross exhibits, cross-examination time estimates, exhibits lists, and errata	November 5, 2025	January 8, 2026	January 8, 2026
Evidentiary hearing	November 17–19, 2025	January 13–15, 2026	January 13–15, 2026
Simultaneous post-hearing briefs	December 19, 2025	February 13, 2026	February 13, 2026
Reply briefs	February 2, 2026	March 6, 2026	March 6, 2026

With respect to deposing Kathryn McPherson, I am checking on availability and will get back to you.

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Subject: RE: (DTG / UTC) TG-240761 - Request for Continuance of Evidentiary Hearing

[EXTERNAL]

Hi Lisa,

Thank you for your proposal; we appreciate your flexibility. We agree with Staff's revised dates, but also think that additional case deadlines should be extended given Staff's request earlier this week for a three-week extension for its discovery responses.

A three week extension—which would push Staff's response deadline to only four days before DTG's deadline to file response testimony—prevents DTG from fully reviewing, processing, and integrating Staff's documents. As such, Staff's proposed discovery extension is unworkable and would be opposed by DTG. Unless Staff agrees to a much shorter extension, DTG will file a motion to compel.

We'd like to avoid further motions practice, however, and think that an overarching six-week extension of all case deadlines addresses our concerns. Below is a proposed revised case schedule. Please let us know if you agree.

-

Event	Current Schedule	Revised Schedule
<i>Staff's responses to DTG's discovery requests</i>	<i>June 5, 2025</i>	<i>June 26, 2025</i>
Response testimony	June 30, 2025	August 11, 2025
Settlement conference	August 18, 2025	September 29, 2025
Rebuttal and cross-answering testimony	October 1, 2025	November 12, 2025
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Reply briefs	February 2, 2026	March 6, 2026

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Subject: RE: (DTG / UTC) TG-240761 - Request for Continuance of Evidentiary Hearing

Hi Stephanie,

Staff would not oppose a motion to continue based on the Company's conflict. We note that the schedule is already fairly elongated, which raises other concerns that were discussed when the original schedule was set. However, the dates you propose work for Staff. Moving the hearing date would also impact other deadlines. See below for Staff's proposal to accommodate DTG's conflict.

Discovery deadline - December 22, 2025

Cross exhibits, etc. - January 8, 2026

Hearing - January 13-15, 2026

Briefs - February 13, 2026

Reply briefs - March 6, 2026

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Subject: (DTG / UTC) TG-240761 - Request for Continuance of Evidentiary Hearing

[EXTERNAL]

All,

We have a trial conflict with the Evidentiary Hearing currently scheduled from November 17 through 19. As such, we are planning to request a continuance of the Evidentiary Hearing to **Tuesday, January 13 to Thursday, January 15, 2026** pursuant to WAC 480-07-385.

Please let us know if you will oppose this request. We're happy to work with the parties to find another date in January 2026 if there are conflicts with our requested continuance date.

Thank you,

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