**From:** Anthony McNamer [mailto:anthony@mcnamerlaw.com]
**Sent:** Monday, June 21, 2010 9:38 PM
**To:** Torem, Adam (UTC)
**Cc:** UTC DL Records Center; Todd Lesser; Joseph Dicks; Lisa Anderl; Anthony McNamer
**Subject:** Re: UT-093035 Qwest Motion to Strike North County's Rebuttal Testimony

Judge Torem,

North County opposes Qwest's Motion to Strike based on the fact that there is nothing in the rules that allow a motion to strike.   As to the specific allegations contained within the motion, I have never practiced before the WPUC before and am not as intimately familiar with the rules and practices as counsel for Qwest.  I had been referring to WAC 480-07-145(2)(a) and incorrectly assumed that filings were due by 5 pm.   As to North County's testimony referencing Qwest's rebuttal testimony, the timing of the filing likely would not have made a difference.  Our testimony was completed the day before it was due and we likely could have added the additional testimony in the 21 minutes between the time Qwest filed and 3 pm.   We filed just before 5 because that it was time I believed our filing was due.

Anthony E. McNamer, Esq.

McNamer and Company

920 SW Third Ave, Suite 200

Portland, Oregon 97204

ph: 503.727.2504  fax: 503.727.2501

<<http://www.mcnamerlaw.com/attorneysMcNamerBio.html>>

On Jun 21, 2010, at 4:01 PM, Johnson, Leslie wrote:

Please find attached a courtesy copy of the Qwest Motion to Strike North County's Rebuttal Testimony. The original and 4 copies will be sent to the Commission via overnight mail today. Paper copies will also be sent to all parties by U.S. mail.

**Leslie D. Johnson**

**Qwest Regulatory Department**

**Seattle, WA**

**(206)398-2502**

This communication is the property of Qwest and may contain confidential or
privileged information. Unauthorized use of this communication is strictly
prohibited and may be unlawful. If you have received this communication
in error, please immediately notify the sender by reply e-mail and destroy
all copies of the communication and any attachments.

<UT-093035 Qwest Danner Letter 06 21 10 MTS.doc><UT-093035 Danner Letter 06 21 10 MTS.pdf><UT-093035 Qwest Motion to Strike.doc><UT-093035 Qwest Motion to Strike.pdf><UT-093035 Certificate of Service 06 21 10.doc><UT-093035 Certificate of Service 6 21 10 MTS.pdf>