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GARVEY SCHUBERT BARER

A PARTNERSHIP OF PROFESSIONAL CORPORATIONS

Please reply to STEPHEN B. JOHNSON
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DIRECT 206-816-1309

April 20, 2011

VIA E-FILE

David W. Danner, Executive Director and Secretary
Washington Utilities and Transportation Commission
P. O. Box 47250
Olympia, WA 98504-7250

Re: Stericycle of Washington, Inc.'s Motion for Extension of Time and For Expedited
Consideration/Docket No. TG-110553


Dear Secretary Danner:

The attached is being resubmitted to include the certificate of service which was omitted in our earlier filing today of Stericycle of Washington, Inc.'s Motion for Extension of Time and for Expedited Consideration re Docket No. TG-110553.

Please do not hesitate to contact me if you have questions about this matter.

Very truly yours,

GARVEY SCHUBERT BARER

By 
Stephen B. Johnson

Enclosure

cc: Polly McNeill, Esq. (via e-mail)
Jessica Goldman, Esq. (via e-mail)
Frona Woods, Esq. (via e-mail)
Stericycle of Washington, Inc. (via e-mail)

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BEFORE THE WASHINGTON UTILITIES
AND TRANSPORTATION COMMISSION

In the Matter of the Petition of

STERICYCLE OF WASHINGTON, INC.,

For an Order Suspending Tariff Filing and
Initiating an Adjudicatory Proceeding
concerning the Abandonment of Authority
Under G-237 and Proposed Biomedical Waste
Collection and Transportation Services of
Waste Management of Washington, Inc., dba
WM Healthcare Solutions (G237)

Docket No. TG-110553

STERICYCLE OF WASHINGTON,
INC.'S MOTION FOR EXTENSION OF
TIME AND FOR EXPEDITED
CONSIDERATION


Stericycle of Washington, Inc. ("Stericycle"), through its undersigned attorneys of record, respectfully moves the Commission for an extension of time to file Stericycle's response to Waste Management's Motion to Dismiss until a time to be set following the prehearing conference now scheduled for April 29, 2011 and the issuance of a scheduling order by the Administrative Law Judge. Under the Commission's rules, Stericycle's response to the Motion to Dismiss is now due on Friday, April 22, 2011 – 10 days following service and filing of the Motion to Dismiss. Because of the short time remaining before Stericycle's response is due under the current schedule, Stericycle respectfully requests expedited consideration of this Motion on no more than one day's notice.

1 Stericycle believes that the scheduling of all potentially dispositive motions, among
2 other scheduling matters, should be dealt with comprehensively by the Administrative Law
3 Judge at or following the prehearing conference and that such a procedure will promote judicial
4 economy and minimize the unnecessary expenditure of resources by the parties. Stericycle
5 intends to file its own Motion for Summary Judgment as soon as practicable and believes that
6 the two motions (and any other dispositive motion that Waste Management may wish to file)
7 should be considered together. In addition, counsel for Stericycle and counsel for Waste
8 Management have agreed to attempt to develop an agreed stipulation concerning the facts
9 relevant to Stericycle's contention that Waste Management has abandoned any authority it may
10 once have had under its certificate G-237 to provide biomedical waste collection services.
11 Stericycle believes that such a stipulation would aid the Commission in reaching appropriate
12 decisions on that issue in connection with Waste Management's Motion to Dismiss, as well as
13 Stericycle's Motion for Summary Judgment, and that some reasonable amount of time should
14 be allowed to determine whether such a stipulation is possible.

15 Late on Monday, April 18, 2011, counsel for Stericycle emailed counsel for Waste
16 Management and requested that Waste Management agree to the proposed extension of time
17 for Stericycle's response to the Motion to Dismiss. Counsel for Waste Management has
18 indicated that her client is considering our request.

19 DATED this 20th day of April, 2011.

20 GARVEY SCHUBERT BARER

21
22 By 
23 Stephen B. Johnson, WSBA #6196
24 Attorneys for Stericycle of Washington, Inc.
25 Direct: 206-816-1385
26 Fax: 206-464-0125
Email: sjohnson@gsblaw.com

CERTIFICATE OF SERVICE

I hereby certify that I have this day served this document upon all parties of record in this proceeding, by the method as indicated below, pursuant to WAC 480-07-150.

Poly L. McNeill Jessica L. Goldman Summit Law Group PLLC 315 Fifth Avenue South, Suite 1000 Seattle, WA 98104-2682 (206) 676-7000	<input type="checkbox"/> Via Legal Messenger <input type="checkbox"/> Via Facsimile <input checked="" type="checkbox"/> Via U.S. Mail <input checked="" type="checkbox"/> Via Email pollym@summitlaw.com jessicag@summitlaw.com
Fronda Woods Assistant Attorney General 1400 South Evergreen Park Drive S.W. P. O. Box 40128 Olympia, WA 98504-0128 (360) 664-1225	<input type="checkbox"/> Via Legal Messenger <input type="checkbox"/> Via Facsimile <input checked="" type="checkbox"/> Via U.S. Mail <input checked="" type="checkbox"/> Via Email fwoods@utc.wa.gov
Washington Utilities and Transportation Commission 1300 South Evergreen Park Drive S.W. P. O. Box 47250 Olympia, WA 98504-7250	<input checked="" type="checkbox"/> Via Legal Messenger <input type="checkbox"/> Via Facsimile <input type="checkbox"/> Via U.S. Mail <input checked="" type="checkbox"/> Via Email records@utc.wa.gov

Dated at Seattle, Washington, this 20th day of April, 2011.



 Vickie L. Owen