BEFORE THE WASHINGTON UTILITIES

AND TRANSPORTATION COMMISSION

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| 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 (G-237) |  | Docket No. TG-110533  waste management of washington, inc.’s REsponse to sTericycle’s motion for extension of time and for expedited consideration |

1. Waste Management of Washington, Inc. d/b/a WM-Healthcare Solutions (“Waste Management”), by and through Summit Law Group, hereby submits this response to Stericycle’s Motion for Extension of Time and for Expedited Consideration. Waste Management does not oppose an extension, but it adamantly objects to Stericycle’s request that the response date be left open in the manner requested.
2. Waste Management filed and served a Motion to Dismiss Stericycle’s Complaint and Petition on April 12, 2011. The Motion was accepted in hard copy by the Commission’s Records Center on April 13, 2011. Under WAC 480-07-380(1)(c), the responses to Waste Management’s Motion to Dismiss are due ten (10) days after filing, on Monday, April 25, 2011. There is no evidence of hardship or unreasonable burden for Stericycle to file its response in a timely fashion. The Motion was properly served and filed, and the parties had ample notice of the regulation that establishes the date for responding. Indeed, the issues were discussed freely at the Open Meeting on April 14. Waste Management objects to an extension of time that allows for factual evidence to be developed through stipulations or discovery and believes that any motions for summary determination should be scheduled separately. However, more than that unfairly benefits Stericycle, to Waste Management’s detriment. Waste Management is willing to agree to a one-week extension that would allow the parties’ responses to be filed on May 2, 2011.

DATED this 20th day of April, 2011.

By

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Attorneys for Waste Management of Washington, Inc.

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.

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| Steven B. Johnson  Donald B. Scaramastra  Garvey Schubert Barer  1191 Second Ave., Suite 1800  Seattle, WA 98101  (206) 464-3939  sjohnson@gsblaw.com | 🞎 Via Legal Messenger  🞎 Via Facsimile  🗹 Via U.S. Mail  🗹 Via Email |
| Washington Utilities and Transportation Commission  1300 S. Evergreen Park Dr. SW  PO Box 47250  Olympia, WA 98504-7250  360-664-1160  records@utc.wa.gov | 🞎 Via Legal Messenger  🞎 Via Facsimile  🗹 Via Federal Express  🗹Via Email |
| Fronda Woods  Assistant Attorney General  1400 S. Evergreen Park Drive S.W.  P.O. Box 40128  Olympia, WA 98504-0128  fwoods@utc.wa.gov | 🞎 Via Legal Messenger  🞎 Via Facsimile  🞎 Via U.S. Mail  🗹Via Email |

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

Kathy Moll