

1 BEFORE THE WASHINGTON UTILITIES
2 AND TRANSPORTATION COMMISSION

3 In the Matter of the Petition of

4 STERICYCLE OF WASHINGTON, INC.,

5 For an Order Suspending Tariff Filing and
6 Initiating an Adjudicatory Proceeding
7 concerning the Abandonment of Authority
8 Under G-237 and Proposed Biomedical Waste
9 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

- 10 1. Waste Management of Washington, Inc. d/b/a WM-Healthcare Solutions ("Waste
11 Management"), by and through Summit Law Group, hereby submits this response to
12 Stericycle's Motion for Extension of Time and for Expedited Consideration. Waste
13 Management does not oppose an extension, but it adamantly objects to Stericycle's request
14 that the response date be left open in the manner requested.
- 15 2. Waste Management filed and served a Motion to Dismiss Stericycle's Complaint and Petition
16 on April 12, 2011. The Motion was accepted in hard copy by the Commission's Records
17 Center on April 13, 2011. Under WAC 480-07-380(1)(c), the responses to Waste
18 Management's Motion to Dismiss are due ten (10) days after filing, on Monday, April 25,
19 2011. There is no evidence of hardship or unreasonable burden for Stericycle to file its
20 response in a timely fashion. The Motion was properly served and filed, and the parties had
21 ample notice of the regulation that establishes the date for responding. Indeed, the issues
22 were discussed freely at the Open Meeting on April 14. Waste Management objects to an
23 extension of time that allows for factual evidence to be developed through stipulations or
24 discovery and believes that any motions for summary determination should be scheduled
25 separately. However, more than that unfairly benefits Stericycle, to Waste Management's
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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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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.

Steven B. Johnson Donald B. Scaramastra Garvey Schubert Barer 1191 Second Ave., Suite 1800 Seattle, WA 98101 (206) 464-3939 sjohnson@gsblaw.com	<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
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	<input type="checkbox"/> Via Legal Messenger <input type="checkbox"/> Via Facsimile <input checked="" type="checkbox"/> Via Federal Express <input checked="" type="checkbox"/> 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	<input type="checkbox"/> Via Legal Messenger <input type="checkbox"/> Via Facsimile <input type="checkbox"/> Via U.S. Mail <input checked="" type="checkbox"/> Via Email

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



Kathy Moll