

All My Sons

Moving & Storage

8637 S. 212th Street

Kent, WA 98031

(206) 444-9000 FAX (253) 437-1228

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12/6/02

Washington Utilities & Transportation Commission
1300 S. Evergreen Park Drive S.W.
P.O. Box 47250
Olympia, WA 98504-7250

Re: Docket #TV-021248 Gertraude M. Taut, Complainant, v. All My Sons Moving

Dear sirs:

We are responding to the initial order from the brief adjunctive hearing.

After careful deliberation of the initial order we are willing to accept the relief Judge Berg has ordered regarding the relocation of Ms. Taut. It is our contention that the best possible resolution would be to conclude this matter promptly.

During the review of Judge Berg's order, we found a few instances that could be benefit from further clarification and testimony. We believe that the inclusion of two affidavits from employees involved directly in the scheduling and execution of Ms. Taut's relocation can provide a firmer base as to why we believe that the storage rates were properly calculated and certify that Ms. Taut did indeed receive a rights and responsibilities brochure at the time of her original estimate.

The first notarized affidavit from Mr. Brian Hegland states that he provided a rights and responsibilities brochure to Ms. Taut on October 24, 2001. He also indicates that during this time Ms. Taut indicated her choice to move into permanent storage. Additionally, When we learned that an estimate had been performed, Mr. Hegland indicated that Ms. Taut stated that she believed she would be in storage for "several months."

The second notarized affidavit from Ms. Laurie Baca states that Ms. Taut and Ms. Baca had a specific conversation about a choice between "permanent storage" and temporary

This is further clarified by Ms. Taut in her own words. In reference to item #9, Ms. Taut's letter dated April 22, 2002 states "Enclosed is \$330 for the first month including storage. This was your quote as of 10/24/2001. Storage fee for the month of May is to follow."

This indicates that Ms. Taut's intention was to remain in storage and not to move into a temporary residence.

This is further clarified in the following paragraph where Ms. Taut states "I had to arrange for separate storage, extra cost and much added stress."

Why would Ms. Taut need "separate storage" as shown that she did indeed procure in item #8 (the storage receipt) if indeed she was moving directly into a new apartment as she indicated she wished to do so during her testimony in the brief adjunctive hearing?

The storage receipt indicates that Ms. Taut was paying approximately \$51 per month. We contend that Ms. Taut's belongings (which require 7 containers in our storage) would not have fit into this unit with respect to Ms. Taut's testimony to the contrary.

This is further validated by contacting Pacific Northwest Storage at 253-531-7300 who will indicate that size of unit B-42 is 5x10. A 5x10 unit is not adequate to store in excess of 8,000lbs of household goods.

In item 18 dated September 25, 2002, Ms. Taut states "I have rented an apartment April 1, 2002, with a storage area large enough to hold all my belongings. I have paid for this area since April 1, 2002."

If Ms. Taut has paid for this storage unit to hold her belongings since April 1, 2002, and her move was into our storage occurred March 27, 2002, does this in-itself not clearly indicate a motivation to have these items stored for longer than 90 days if the items she relocated into her storage on March 30, 2002 were still in storage on September 25, 2002?

The first instance of complaint issued to Mr. John Cupp of the Utilities Commission in item 15 indicates that on May 8th, Ms. Taut explained her relocation was into storage and requested he inform her of what the monthly storage costs would be.

In conclusion, while All My Sons, in an attempt to resolve this matter promptly, will adhere to the relief outlined by Judge Berg, we feel it is important to substantiate what our position in this matter has been by providing both additional affidavits and referring

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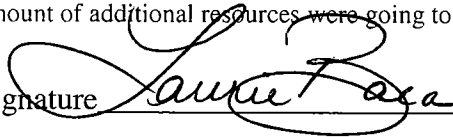
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To Whom it May Concern:

I have been asked by my Operations Manager, Mr. James Bergstrom, to document my conversation with Ms. Gertraude Taut in regards to the scheduling of her relocation. Ms. Taut contacted All My Sons. and stated she was calling from the courthouse. She explained that she had been evicted, and needed to schedule a move from her residence into the All My Sons Storage facility in Kent, WA for an undetermined amount of time. At this point, Ms. Taut and I had a conversation regarding what constituted "permanent storage." It was explained that anything over 90 days would be considered permanent storage, and would be calculated at a monthly rate, pro-rated to the day and anything under 90 days would be calculated by weight, and not pro-rated. Ms. Taut indicated that she would be utilizing our storage facility for more than 90 days.

At no time during the conversation I had with Ms. Taut did she indicate that she had received a written estimate prior to this phone call. Ms. Taut provided me with a description of the items to be relocated, and I reserved a crew of two men to handle this seemingly small move. At no time did she mention that All My Sons would be responsible for any additional packing. It was not until the crew arrived at Ms. Taut's home that we realized that this was a much larger move than she had indicated over the phone, and a large amount of additional resources were going to be required to complete the relocation.

Signature



Date

12-6-02

CERTIFICATE OF NOTARY

STATE OF WAASH

COUNTY OF KING

On this 6 day of DECEMBER 2002, before me personally came and appeared Laurie Baca, known to me to be the individual described in and who executed the foregoing

12/6/02

To whom it may concern:

On 10/24/01, I Brian Hegland, did provide Ms. Gertraude Taut with an estimate for packing, moving and storage of her household goods. When the estimate was completed and presented to Ms. Taut ~~the accompany~~ she received a folder containing an Estimate cost of Services, Table of measurements as well as a copy of the Rights + Responsibilities guide and information regarding additional insurance. The estimate was for packing one day, moving the next, then storage for up to 6 mos. until she could find another residence. Ms. Taut apparently called to have us come out to perform services but did not indicate that she had received an estimate prior. When sent out the 2 man crew came upon a sizeable difference than what the secretary was told about. We then, by her

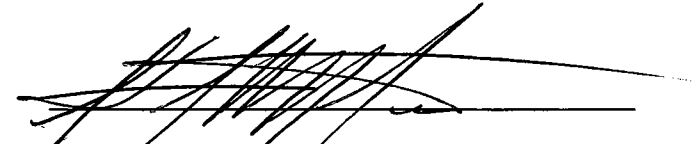
State of Washington

}ss.

County of King

I certify that I know or have satisfactory evidence that B. HEINOLD is the person who appeared before me, and said person acknowledged that he signed this instrument and acknowledged it to be his free and voluntary act for the uses and purposes mentioned in this instrument.

Dated: DEC 6th 2002



Notary Public in and for the State of
Washington

residing at KENT WA

My appointment expires 1-9-05