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4	WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION		
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6)	
7	In re: Classification of)) DOCKET #: TE 180455	
8)) SPECIAL NOTICE OF APPEARANCE	
9	CHRIS ROBERT MILLER, D/B/A)	
	SILVER LIMOUSINE AND SILVER TRANSPORTATION		
10	Respondent		
11	Respondent		
12	To: UTC Commission		
14	And to: Jason Hoxit, Compliance Investigator		
15 16	Please take notice that the undersigned attorney, John R. Bonin, Bonin Law, PO Box 783,		
17	Shelton, WA 98584 hereby makes and enters Special Notice of Appearance in the above		
	referenced matter for purposes of requesting a continuance in order to become acquainted with		
18	the facts and in order to engage in discovery.	This Notice of Appearance is without waiver of	
19	issues related to:	11	
20	A) Insufficiency of Service of Process		
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22	B) Insufficiency of Process		
23	C) Lack of Subject Matter Jurisdiction		
24	D) Lack of Personal Jurisdiction		
25	E) Failure to state a claim upon		

1	F) Improper venue	
2	G) Statute of Limitations	
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4	Counsel, requests that the Commission authorize a continuance of no less than 90 days so	
5	that counsel can engage in discovery and explore applicable defeneses and/or work toward	
6	narrowing and/or streamlining the issues.	
7	Counsel is concerned that materials sought by the respondent early in the process (with	
8	UTC investigator involvement and while in the hands of the State Department of Transportation	
9	Investigator) was not fully and properly produced and believes that additional records and/or	
10	witnesses may still exist. Counsel further notes the burden of proof upon the Respondent and the	
11	shortened time ability afforded to prepare and present defenses. There seems some factual	
12	disputes and discrepancies which may require witness testimony and Counsel needs time to fully	
13	identify these witnesses.	
14	Without a 90 day continuance to investigate and explore these issues, counsel believes	
15	that Respondent's rights and privileges may suffer irreparable damage from which there might	
16	exist no adequate remedy at law.	
17	Respectfully Submitted this 2 nd day of December, 2019	
18	Bonin Law	
19		
20	Jan	
21	John R. Bonin, WSBA 25760	
22	Attorney for Respondent	
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