

1 F) Improper venue

2 G) Statute of Limitations

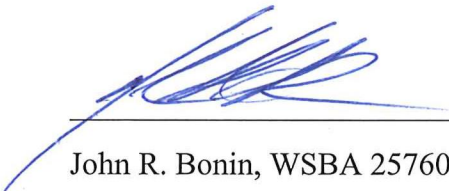
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4 Counsel, requests that the Commission authorize a continuance of no less than 90 days so
5 that counsel can engage in discovery and explore applicable defenses and/or work toward
6 narrowing and/or streamlining the issues.

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 2nd day of December, 2019

18 Bonin Law

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21 John R. Bonin, WSBA 25760

22 Attorney for Respondent