

September 2, 2016

29208.0101.

Steven King
Executive Director and Secretary
Washington Utilities and Transportation Commission
PO Box 47250
1300 S. Evergreen Park Dr. SW
Olympia, WA 98504-7250

Attention: Greg Kopta, Chief, Administrative Law Judge Division

Re: Docket TC-143691 and TC-160516; Shuttle Express v Speedishuttle

Dear Mr. King:

Pursuant to WAC 480-07-825(5)(a), Speedishuttle Washington, LLC has the right to reply to new challenges to Order 06 raised by Shuttle Express in its Answer yesterday to Speedishuttle's Petition for Administrative Review of Order 06. In addition to that subsection, Speedishuttle is now also contemplating a filing as well, pursuant to WAC 480-07-825(5)(b), to respond particularly to new and/or extra-record arguments in that Answer. Since returning from a prehearing conference at the Commission yesterday at 4:30 p.m., I have been unable to complete review of the Answer due to a telephonic expert deposition I am assisting in defending today in a pending federal class action case and for which I continued preparation yesterday afternoon. Nevertheless, I have contacted Mr. Harlow today and attempted to reach Mr. Beattie by email to determine whether they oppose an extension request to Monday, September 12, 2016 since, by the rule, the Reply would currently be due the day after Labor Day, Tuesday, September 6th.

As allowed by WAC 480-07-825(5)(c), we are now asking that the Commission extend the time period for reply until September 12, 2016.

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I understand Mr. Beattie is out of the office today and the final deadline for filing Answers to the Petition for Administrative Review is Tuesday, September 6. It is possible that Staff may also wish to reply to the cross-answer to the Petition for Administrative Review or other issues and this would obviate the need for multiple replies. With the intervening Labor Day weekend and my focus on the federal class action litigation deposition today and discovery conferences in a related federal court action early Wednesday, I lack any available time to develop a Reply to the Answer over this weekend and for much of next week, despite canceling plans to be out of town Labor Day because of workload constraints.

Thank you for your consideration in this matter. It is my understanding that Mr. Harlow is not opposed to a reasonable extension of time in consideration of counsel's scheduling constraints. I would argue in light of all of the above conflicts and the intervening holiday weekend, an extension to September 12 is reasonable. Because I am generally unavailable by phone today, I wanted to get this to the Commission this afternoon nevertheless since the current reply deadline appears to be Tuesday, September 6, 2016. Thank you for your attention to this matter.

Yours truly,

WILLIAMS, KASTNER & GIBBS PLLC



David W. Wiley

cc: Brooks Harlow
Administrative Law Judge Rayne Pearson
Julian Beattie, AAG