

1 **IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON**
2 **IN AND FOR THURSTON COUNTY**

3
4 **WASHINGTON MOVERS**)
5 **CONFERENCE, a domestic non-profit**)
6 **corporation; CENTRAL MOVING &**)
7 **STORAGE, L.L.C., organized under**)
8 **Washington law; MORRISON MOVING**)
9 **& STORAGE CO., INC., a domestic**)
10 **corporation,**)

11 **Petitioners,**)

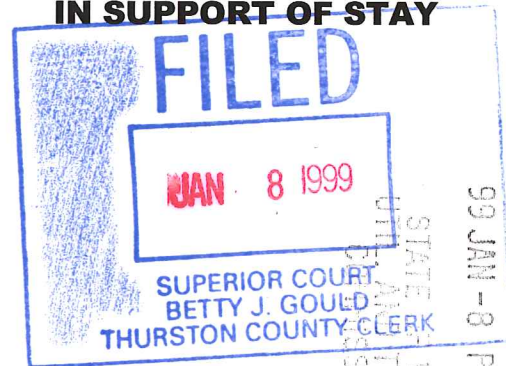
12 **v.**)

13)
14 **WASHINGTON UTILITIES &**)
15 **TRANSPORTATION COMMISSION, an**)
16 **agency of the State of Washington,**)

17)
18 **Respondents.**)

No. 99 2 00038 0

**DECLARATION OF
JACK E. CRONKHITE
IN SUPPORT OF STAY**



19
20 **I, Jack E. Cronkhite, declare:**

21 **1. I am president of Morrison Moving & Storage Co., Inc., a**
22 **Washington corporation, and am authorized to speak on its behalf. My**
23 **company holds an operating authority (permit) issued by WUTC**
24 **authorizing movement of household goods in Spokane and Moses Lake,**
25 **Washington. I am competent to be a witness in this proceeding. All**
26 **facts are based upon my personal knowledge.**

DECLARATION OF JACK E. CRONKHITE - 1

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Olympia, Washington 98506
(360) 754-7667 Fax: (360) 754-0249

1 **2. Morrison Moving & Storage's predecessor was in the**
2 **household goods moving business in Spokane prior to state regulation**
3 **in 1911. I purchased Permit CC-1626 (which was grandfathered by the**
4 **predecessor state agency to WUTC) in 1957 for \$15,000.00. Our permit**
5 **has a present value of \$25,000.00. The proposed new rules will render**
6 **our permit valueless due to lowering of standards for temporary and**
7 **permanent permits.**

8 **3. Effects of the new rules will be to cut back employment**
9 **(and employee health benefits) and reduce or eliminate capital**
10 **expenditures, maintenance for vehicles and facilities and profitability.**

11 **4. My primary business is located in Spokane, Washington**
12 **with a branch office in Tacoma, Washington. There are at least five**
13 **unlicensed movers in Spokane who compete with me for business.**
14 **Jerry Jahn, Starving Students, Stan Brown, and Larry Pacello**
15 **household goods movers without a WUTC permit or abiding by WUTC**
16 **regulations. I complained to WUTC about Stan Brown d/b/a Muscles**
17 **Unlimited. WUTC did not take enforcement action against Stan Brown**
18 **or for that matter any other unlicensed mover.**

DECLARATION OF JACK E. CRONKHITE - 2

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1 **5. I estimate a 20% loss of business if the exclusion of**
2 **transportation of customer packed self-storage containers if the new**
3 **rules go into effect.**

4 **6. Morrison Moving & Storage has been a member of the**
5 **Spokane Chamber of Commerce, Better Business Bureau, contributor**
6 **to the city sponsored Lilac Festival, contributor of free storage space**
7 **to the Retired Senior Volunteer Program, contributor of free storage**
8 **space to Waumpum (a yearly charity auction) and has participated by**
9 **giving financial support to other worthy causes. If the proposed rules**
10 **go into effect, my company will not be able to continue its charities.**
11 **In fact, my company's continued existence would be placed in**
12 **jeopardy due to reductions in revenues caused by unfair competitive**
13 **pricing and a proliferation of competing movers.**

14 **7. I declare under penalty of perjury under the laws of the**
15 **State of Washington that the foregoing is true.**

16 Signed this 7th day of January, 1999 at Spokane, Washington.

17
18
19 151 *Jack E. Cronkhite*
20 **Jack E. Cronkhite**

DECLARATION OF JACK E. CRONKHITE - 3

by jlc per
telephone
authorization
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5. I estimate a 20% loss of business if the exclusion of transportation of customer packed self-storage containers if the new rules go into effect.

6. Morrison Moving & Storage has been a member of the Spokane Chamber of Commerce, Better Business Bureau, contributor to the city sponsored Lilac Festival, contributor of free storage space to the Retired Senior Volunteer Program, contributor of free storage space to Waumpum (a yearly charity auction) and has participated by giving financial support to other worthy causes. If the proposed rules go into effect, my company will not be able to continue its charities. In fact, my company's continued existence would be placed in jeopardy due to reductions in revenues caused by unfair competitive pricing and a proliferation of competing movers.

7. I declare under penalty of perjury under the laws of the State of Washington that the foregoing is true.

Signed this 7 day of January, 1999 at Spokane, Washington.


Jack E. Cronkhite

DECLARATION OF JACK E. CRONKHITE 3

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