



**GREATAMERICAN  
MOVING & STORAGE**

**COVER LETTER**

**TO: Jeffrey D. Goltz, Philip B. Jones, Steven King, Sally Brown**  
Washington Utilities and Transportation Commission  
P.O. Box 47250  
Olympia, Washington 98504-7250

**FROM:** Chana Green d/b/a  
Great American Moving & Storage  
**DOT# 2029028**  
Owner  
4300 S WAYSIDE DR #103  
HOUSTON, TX 77087  
(800) 557-7419

**DATE:** March 10, 2014

**PAGES:** 3

**Docket Number: DOCKET TV-131603**

**REASON:** Attached is a certified copy of the Motions for Extension of Deadline to Reconsider the Final Order aka Administrative Law Judge's order and Motion to Reconsider. The motion is filed on behalf of Chana Green d/b/a GREAT AMERICAN MOVING & STORAGE in reference to **DOCKET TV-131603**.

**PRIORITY:** High

**COMMENTS:** I, Chana Green d/b/a GREAT AMERICAN MOVING & STORAGE (DOT# 2029028), do hereby certify that a copy of the foregoing motion has been sent by postage paid first class mail to the respondent on March 10, 2014.

STATE OF WASH.  
UTIL. AND TRANSP.  
COMMISSION

2014 MAR 13 PM 2:41

RECEIVED  
PROPERTY MANAGEMENT

## CERTIFICATE OF SERVICE

I, Chana Green d/b/a GREAT AMERICAN MOVING & STORAGE, do hereby certify that a copy of the foregoing motion has been sent by postage paid first class mail to the respondent at the address of:

**Jeffrey D. Goltz**

Commissioner

Tel: 360-664-1173

Fax: 360-586-1150

[jgoltz@utc.wa.gov](mailto:jgoltz@utc.wa.gov)

**Philip B. Jones**

Commissioner

Tel: 360-664-1169

Fax: 360-586-1150

[pjones@utc.wa.gov](mailto:pjones@utc.wa.gov)

**Steven King**

Acting Executive Director

Tel: 360-664-1115

[sking@utc.wa.gov](mailto:sking@utc.wa.gov)

**Sally Brown**

Legal

Assistant Attorney General

Washington Utilities and Transportation Commission

P.O. Box 47250

Olympia, Washington 98504-7250

this the **10th day of March, 2014.**

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**Chana Green, Owner**

d/b/a **GREAT AMERICAN MOVING & STORAGE**

BEFORE THE WASHINGTON  
UTILITIES AND TRANSPORTATION COMMISSION

In the Matter of Determining the Proper ) DOCKET TV-131603  
 Carrier Classification of, and Complaint )  
 for Penalties Against: )  
 )  
 GREEN, CHANA d/b/a )  
 GREAT AMERICAN MOVING & )  
 STORAGE, **Movant** )  
 February 26, 2014 )  
 )  
 Respondent. )  
 .....

RECEIVED  
 RECORDS MANAGEMENT  
 2014 MAR 13 PM 2:41  
 STATE OF WASH.  
 UTIL. AND TRANSP.  
 COMMISSION

**Motions for Extension of Deadline to Reconsider the Final Order aka Administrative Law  
 Judge's order  
 and  
 Motion to Reconsider**

Comes the Movant, Chana Green d/b/a GREAT AMERICAN MOVING & STORAGE, who asks this honorable Commission to extend the deadline for a Motion to Reconsider for the FINAL ORDER aka Administrative Law Judge's order in the above styled cause.

The Movant is requesting the Commission to extend the deadline to Reconsider the Final Order under **WAC 170-03-0630 5(b)**. **WAC 170-03-0630 5(b)** states that if a reconsideration request is received by the review judge after the deadline, the final order will not be reconsidered.

**However, the review judge may extend the deadline if a party demonstrates good cause for the extension.**

The Movant is requesting the Commission to extend the deadline to Reconsider the Final Order under **WAC 170-03-0630 5(b)** for these reasons as follows:

1. On 12/31/2013, the Movant was obligated to leave the country to travel abroad to Israel. The movant was then required to prepare for a leave of absence. Personal life arrangements alongside with business arrangements were to be made leading up to the point of departing America.
2. On 12/31/2013, the Movant took an official leave of absence from Great American Moving and Storage as the Owner, and all of its duties.

3. On 12/31/2013, the Movant travelled to Jerusalem. Operating a business and its affairs include: day-to-day operations within the facility's physical location, as well as, responding to any correspondence from the Washington Utilities and Transportation Commission's documentations.
  
4. On or about the 1/22/2014, the Movant returned to America via United/ Lufthansa. Day-to-day business operations carried on as usual on 2/1/2014 when I returned back to work.

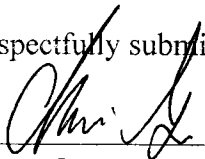
The Movant's substantial reason is put forth in good faith that is not unreasonable, arbitrary, or irrational and that is sufficient to create an excuse for an act under the law.

Furthermore, the Movant, asks this honorable Commission to Reconsider the FINAL ORDER aka Administrative Law Judge's order in the above styled cause.

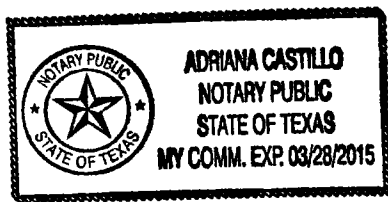
The Movant is requesting the Commission to Reconsider the Final Order under **RCW 34.05.473 1(a)**. **RCW 34.05.473 1(a)** states that a party may not be required to comply with a final order unless the party has been served with or has actual knowledge of the final order.


Due to the unfortunate circumstances listed above, such as leave of absence, and not being physically present in America, the Movant, is respectfully requesting a reconsideration of the FINAL ORDER aka Administrative Law Judge's order under **RCW 34.05.473 1(a)**. Movant would prove that the notification of leave of absence, and not being physically present in America are the causes of not understanding the facts in the Final Order as true that would lead to further investigation. Consequently, the Movant did not receive fair due process.

In conclusion, for all of the above reasons, THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION should reinstate the suspension of \$3,500. The Movant would prove past and present full compliance to RCW 81.80 other than the payment for \$1,500.00 violation due to lack of actual knowledge of this Order; therefore, Movant's motion to reconsider and reinstatement of the suspension of \$3,500.00 should be granted. The Movant would agree to pay \$1,500 as stated prior to the FINAL ORDER aka Administrative Law Judge's order.

Respectfully submitted,  


Chana Green, pro se  
 d/b/a **GREAT AMERICAN MOVING & STORAGE**



State of Texas County of Harris  
 Subscribed and sworn before me on 3/5/2014 (Date)  
  
 (Notary Signature)