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BEFORE THE WASHINGTON STATE UTILITIES
AND TRANSPORTATION COMMISSION

In the Matter of the Application of

DOCKET TC-240717

EAGLE TOWNCAR SERVICE, LLC.

MOTION FOR LEAVE TO REPLY

For Authority to Operate as an Auto
Transportation Company in the State of
Washington

**EXPEDITED RULING REQUESTED
PRIOR TO NOVEMBER 26, 2024**

1. Eagle Towncar Service LLC (Eagle Towncar or Company) moves for leave to reply to the response filed by Pacific Northwest Transportation Services (PNTS) on November 21, 2024. Eagle Towncar’s proposed reply is attached to this Motion.

2. There is good cause for this motion. Most importantly, as the attached Reply demonstrates, PNTS raises new facts or arguments in its response which WAC 480-07-370(5)(b) expressly provides as a basis for a Reply. In the process, PNTS overlooks important Commission rules, falsely asserts that it provides the same service in the same territory, and makes broad claims about Eagle Towncar’s fitness to operate. PNTS’s unfounded response should not save its objection from being stricken or prevent Eagle Towncar’s temporary

1 application from being granted on an expedited basis. Eagle Towncar’s proposed reply
2 addresses several of the misleading claims made in PNTS’s Response.

3 DATED this 22nd day of November, 2024.
4

5 */s/ Michael S. Howard*
6 _____
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8 Dave Wiley, WSBA #08614
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