## BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

In re. Application TG-081725 of	)
	) <b>DOCKET TG-081725</b>
NORTHWEST INDUSTRIAL SERVICES, LLC	)
d/b/a American On Site Services	) MOTION
	) FOR
	) CONTINUANCE
For a Certificate of Public Convenience and	)
Necessity to Operate Motor Vehicles in	)
Furnishing Solid Waste Collection Service	)
	_)

Comes now Northwest Industrial Services, LLC d/b/a American Services and moves the Commission for a continuance of the hearing presently set for February 18, 2009 be continued to a date on or after April 6, 2009.

This motion is based upon the records and files herein and upon the attached declaration of Paul J. Allison, attorney for Northwest Industrial Services, LLC.

Dated this 10<sup>th</sup> day of February, 2009

Respectfully submitted,

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Paul J. Allison, WSBA No. 2114 11315 E. 44<sup>th</sup> Ave.

Spokane Valley, WA 99206-9417

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Paul J. Allison, under penalties of perjury, declares as follows:

I am the attorney for Northwest Industrial Services, LLC. I was engaged by Northwest Industrial Services to represent them in this matter on February 4, 2009. I have not had

time, and by February 18, 2009 I will not have had time, to adequately prepare for the hearing scheduled for February 18, 2009. Based on the information that I have obtained to date I have concluded that it may be necessary to submit further materials to the Commission prior to the hearing and that it may be necessary to conduct formal discovery. At the informal telephone conference held on February 10, 2009, I stated my intention to request a continuance and Mr. Sells and Mr. Fassio both stated that they had no objection to the granting of a continuance until a date in April or such later date as may be set by the Honorable Adam E. Torem, Administrative Law Judge.

Dated this  $10^{\rm th}$  day of February,

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Paul J. Allison