

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

SANDRA JUDD, et al.,

Complainants,

v.

AT&T COMMUNICATIONS OF THE  
PACIFIC NORTHWEST, INC.; and  
T-NETIX, INC.,

Respondents.

DOCKET NO. UT-042022

THE PARTIES' JOINT PROPOSAL RE  
DISCOVERY SCHEDULE AND  
RESPONSES TO MOTIONS

1. In Order 17, the Commission ordered:

The parties will file an agreed adjustment to the procedural schedule including deadlines for the completion of depositions and the filing of responses to T-Netix, Inc.'s and AT&T Communications of the Pacific Northwest, Inc.'s Motions for Summary Determination by Friday, May 1, 2009. If the parties do not file such an adjustment to the procedural schedule, one will be instituted by the Commission.

2. The parties have agreed to the following schedule revision:

June 10, 2009: End of fact discovery

July 1, 2009: End of expert discovery

July 21, 2009: Responses due to summary determination motions

August 4, 2009: Replies for motions for summary determination

3. The Commission's rules of procedure do not provide for replies, and this schedule assumes that T-Netix and AT&T will receive permission to file reply memoranda.

4. The parties also request that the scheduling order include the following provision: "A deposition may be taken after the deadlines stated in this order if either (1) a showing of good cause is made to the Commission for the deposition to occur, or (2) without a motion if all parties agree that the deposition may be taken." This should accommodate situations where a witness is not available until after a cut-off date or there is some other logistical reason the deposition cannot occur before the cut-off date.

DATED: April 30, 2009.

SIRIANNI YOUTZ  
MEIER & SPOONEMORE

/s/ Chris R. Youtz

Chris R. Youtz (WSBA #7786)  
Richard E. Spoonemore (WSBA #21833)  
Attorneys for Complainants  
719 Second Avenue, Suite 1100  
Seattle, WA 98104  
Tel. (206) 223-0303  
Fax (206) 223-0246

SCHIFF HARDIN LLP

/s/ Charles H.R. Peters

Charles H.R. Peters  
Attorneys for AT&T

DUANE MORRIS LLP

/s/ Joseph S. Ferritte

Joseph S. Ferretti  
Attorneys for T-Netix, Inc.

## CERTIFICATE OF SERVICE

Pursuant to WAC 480-07-150, I certify that on April 30, 2009, I served a copy of the foregoing document on all counsel of record by e-mail and U.S. Mail at the addresses listed below:

Attorneys for AT&T

Letty S. D. Friesen  
AT&T COMMUNICATIONS  
OF THE PACIFIC NORTHWEST  
2535 E. 40<sup>th</sup> Avenue, Suite B1201  
Denver, CO 80205

[lsfriesen@att.com](mailto:lsfriesen@att.com)

Attorneys for AT&T

Charles H.R. Peters  
David C. Scott  
Tiffany R. Redding  
SCHIFF HARDIN LLP  
6600 Sears Tower  
233 S. Wacker Drive  
Chicago, IL 60606

[cpeters@schiffhardin.com](mailto:cpeters@schiffhardin.com)

[dscott@schiffhardin.com](mailto:dscott@schiffhardin.com)

[trredding@schiffhardin.com](mailto:trredding@schiffhardin.com)

Attorneys for T-NETIX, Inc.

Arthur A. Butler  
ATER WYNNE LLP  
601 Union Street, Suite 1501  
Seattle, WA 98101

[aab@aterwynne.com](mailto:aab@aterwynne.com)

Attorneys for T-NETIX, Inc.

Glenn B. Manishin  
Joseph S. Ferretti  
DUANE MORRIS LLP  
505 - 9<sup>th</sup> Street NW, Suite 1000  
Washington, DC 20004

[gbmanishin@duanemorris.com](mailto:gbmanishin@duanemorris.com)

[jferretti@duanemorris.com](mailto:jferretti@duanemorris.com)

Pursuant to WAC 480-07-145, I further certify that on April 30, 2009, I filed MS Word and PDF versions of this document by e-mail, and the original and four copies of this document by overnight delivery, with the WUTC at the address listed below:

David Danner  
Secretary and Executive Director  
WASHINGTON STATE UTILITIES AND  
TRANSPORTATION COMMISSION  
1300 S. Evergreen Park Drive S.W.  
P.O. Box 47250  
Olympia, WA 98504-7250  
[records@utc.wa.gov](mailto:records@utc.wa.gov)

Pursuant to the Prehearing Conference Order 08, I further certify that on April 30, 2009, I provided a courtesy copy of this document, in MS Word, to Administrative Law Judge Marguerite E. Friedlander by e-mail to [mrussell@utc.wa.gov](mailto:mrussell@utc.wa.gov).

DATED: April 30, 2009, at Seattle, Washington.

/s/ Theresa A. Redfern

Theresa A. Redfern