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June 10, 2015

VIA EMAIL and U.S. MAIL
records@utc.wa.gov

Washington Utilities and
Transportation Commission
1300 S. Evergreen Park Drive S.W.
P.O. Box 47250
Olympia, WA 98504-7250

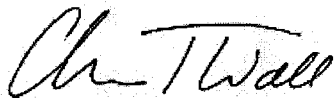
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STATE OF WASH.
UTIL. AND TRANSP.
COMMISSION

RE: Five Star Moving & Storage, LLC
Docket No. TV-150223

Dear Sir or Madam:

Enclosed for filing in the above-referenced docket are the original and three copies of Five Star Moving & Storage, LLC's Motion to File Legal Brief and Certificate of Service with regard to Docket No. TV-150223.

Sincerely,



Christopher T. Wall

CTW:bf
Enclosures

Reply to:
Tacoma Office
1201 Pacific Ave., Suite 2100 (253) 620-6500
Tacoma, WA 98402 (253) 620-6565 (fax)

Seattle Office
600 University, Suite 2100 (206) 676-7500
Seattle, WA 98101 (206) 676-7575 (fax)

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STATE OF WASHINGTON
UTIL. AND TRANSPORTATION
COMMISSION

BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION

In Re Application of:

FIVE STARS MOVING & STORAGE, LLC,

for a permit to operate as a motor carrier of
household goods.

NO. TV-150223

FIVE STARS MOVING & STORAGE LLC's
MOTION FOR LEAVE TO FILE LEGAL BRIEF,
SUPPORTING DECLARATIONS AND
EXHIBITS

On June 9, 2015, the Presiding Officer granted the UTC Staff's motion to strike Five Stars written submissions. The Order granting the motion reasoned that Five Stars' due process concerns were misplaced, in part, because "should Applicant, or even Staff, wish to file legal briefs in this proceeding, the Commission would expect a motion requesting leave for such filings." Dkt. 1 at 3.

Pursuant to that instruction, Five Stars respectfully requests leave to file a brief at the Brief Adjudicative Proceeding (BAP), stating its view of this matter. Five Stars' brief will explain its view and help analyze the issues in this proceeding. Five Stars' brief also seeks to narrow the issues for resolution at the BAP.

The Order also explained that "[a] party seeking to file briefs or additional testimony, that is, testimony in addition to what will be offered at hearing, must first seek leave to do so under WAC 480-07-375(1)(d)." Dkt. 1 at 3. At that point, the BAP was scheduled for June 11, 2015. The Order noted that Five Stars had not timely moved under WAC 480-07-375(1)(d).

1 The BAP is now being rescheduled. Pursuant to WAC 480-07-375(1)(d), Five Stars
2 respectfully requests leave to file declarations of Mr. Wall, Mr. Trick and Ms. Cunningham.
3 The purpose of the declarations is to support Five Stars' brief, authenticate exhibits, and
4 narrow the issues for the BAP. The declarants will be available to testify in person or
5 telephonically with an opportunity for cross examination at the BAP (with the possible
6 exception of Ms. Cunningham, whose availability is currently unknown).¹
7

8
9 Respectfully submitted this 10th day of June, 2015.

10 GORDON THOMAS HONEYWELL LLP

11
12 By  _____

13 Christopher T. Wall, WSBA No. 45873
14 cwall@gth-law.com
15 Attorneys for Applicant
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1 Ms. Cunningham lives in Texas. At best, she may be available to testify telephonically.

CERTIFICATE OF SERVICE

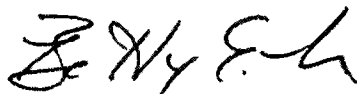
I hereby certify, under penalty of perjury, that on the 10th day of June, 2015, I placed with ABC/Legal Messengers, Inc. a copy of the document to which this certification is attached for delivery to all parties of record as noted below:

Washington Utilities and
Transportation Commission
P.O. Box 47250
Olympia, WA 98504-7250

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[X] Via U.S. Mail
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[X] Via Email

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Betty E. Fry, Legal Assistant
of GORDON THOMAS HONEYWELL LLP