

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

COMPLAINANTS' UNOPPOSED
MOTION TO FILE COMBINED
RESPONSE

1. Respondents AT&T and T-Netix have each filed a motion for summary determination. Complainants' responses to both motions is due on August 27. Many of the facts, exhibits and arguments that Complainants plan to submit will be applicable to both motions. Accordingly, Complainants request that the Commission allow them to file a single response to both motions for summary determination. This will reduce the need to submit duplicate sets of facts, declarations and legal arguments. Further, we believe that it will be more efficient and helpful to the Commission to have a single, consolidated response. Both Respondents have indicated that they have no opposition to this motion.

2. Accordingly, Complainants request that they be permitted to file a single response to the motions for summary determination filed by Respondents.

3. A proposed form of order is included with this motion.

DATED: August 21, 2009.

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/s/ Chris R. Youtz

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CERTIFICATE OF SERVICE

Pursuant to WAC 480-07-150, I certify that on August 21, 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:

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Pursuant to WAC 480-07-145, I further certify that on August 21, 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
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Pursuant to the Prehearing Conference Order 08, I further certify that on August 21, 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.

DATED: August 21, 2009, at Seattle, Washington.

/s/ Theresa A. Redfern

Theresa A. Redfern