**BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

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| IN THE MATTER OF:  LEVEL 3 COMMUNICATIONS LLC INC.’S PETITION FOR ENFORECEMENT OF INTERCONNECTION AGREEMENT WITH QWEST CORPORATION | DOCKET NO. UT-053039 |
| Pac-West telecomm, Inc.  Petitioner,  v.  QWEST CORPORATION,  Respondent. | DOCKET NO. UT-053036  QWEST’S MOTION FOR LEAVE TO FILE A REPLY TO RESPONSE OF LEVEL 3 AND PAC-WEST RE MOTIONS TO AMEND |

1. Qwest Corporation (“Qwest”) hereby files this Motion for Leave to File a Reply to the Response filed by Level 3 and Pac-West on June 28, 2012 in opposition to Qwest’s motions to amend its answers and counterclaims.[[1]](#footnote-1)
2. Qwest submits this response to correct several arguments made by Level 3 and Pac-West that are legally and/or factually wrong, and to address new issues raised by the filing of affidavits and arguments of prejudice.

DATED this 10th day of July, 2012.

Qwest

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1. The Response was electronically filed on June 28, 2012. Pac-West and Level 3 have stated that counsel for Qwest were provided an electronic copy that same day, but undersigned counsel have no record of receiving that e-mail. After discussion, counsel for Pac-West and Level 3 have stated that they would not object to the timeliness of this filing (July 10, 2012), which is 5 business days after Qwest received the hard copy of the Response via U. S. Mail. [↑](#footnote-ref-1)