

**BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION,

Complainant,

v.

CENTURYLINK COMMUNICATIONS,
LLC,

Respondent.

DOCKET NO. UT-181051

**RESPONDENT CENTURYLINK
COMMUNICATIONS, LLC'S
MOTION FOR CONTINUANCE
REGARDING MOTION TO STRIKE**

1. Pursuant to WAC 480-07-375(4) and WAC 480-07-385¹ CenturyLink Communications, LLC (“CLC”), by and through the undersigned counsel, respectfully requests a two-week continuance of the time to respond to Public Counsel’s Motion to Strike Certain Testimony and Exhibits Filed by CenturyLink Communications, LLC (“Motion to Strike”). Specifically, CLC seeks a continuance until July 7, 2022. In addition, pursuant to WAC 480-07-110 and WAC 480-07-130(3), CenturyLink requests that its motion for continuance be heard on shortened time, in advance of the current deadline of June 23, 2022.
2. The Motion to Strike, which spans 53 pages inclusive of attachments, demands that the Commission strike important portions of CLC’s witness testimony and exhibits relied upon by CLC’s witnesses. Charles Steese, CLC’s primary counsel on the issues being raised in the Motion to Strike and on the testimony being targeted by Public Counsel, is

¹ CLC notes that WAC 480-120-385(3)(a) requires a party to “file and serve any written motion for continuance other than an agreed request at least five business days prior to the deadline the party requests to continue.” Given that CLC’s response is due five business days from the service of the Motion to Strike, CLC is filing this motion for continuance as timely as possible and, as noted below, Public Counsel supports CLC’s Motion for Continuance. WAC 480-07-375(4) suggests that the ALJ can alter the 5-day response period for non-dispositive motions.

completing a three-week jury trial in Boston, and is not yet available to focus on Public Counsel's most recent motion to strike CLC's testimony.

3. Public Counsel's motion was served late in the afternoon on June 16, 2022, and the undersigned emailed Public Counsel at 8:03 am on June 17, 2022 to seek Public Counsel's support for an extension of time until July 7, 2022 to respond to the Motion to Strike. Public Counsel agreed to CLC's extension by email at 3:56 p.m. on June 17, 2022.
4. A two-week continuance will not prejudice any party to this proceeding. The deadline for Cross-Answering Testimony is August 31, 2022, leaving nearly two months after CLC responds. Further, CLC notes that Public Counsel waited two and a half months after receiving CLC's testimony before filing the Motion to Strike.
5. Good cause – namely the unavailability of CLC's primary counsel on the relevant issues and testimony – exists for a two-week continuance of the response date from June 23, 2022 to July 7, 2022. CLC respectfully requests that the Commission consider this motion on shortened time.

Dated this 17th day of June 2022.

CENTURYLINK COMMUNICATIONS, LLC



Adam L. Sherr (WSBA # 25291)
Assistant General Counsel
1600 – 7th Ave., Room 1506
Seattle, WA 98191
206 398 2507
adam.sherr@lumen.com

Charles W. Steese, Esq.
Armstrong Teasdale LLP
4643 South Ulster Street, Ste. 800
Denver, Colorado 80237
(720) 200-0677 Ext. 3805
csteese@atllp.com