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BEFORE THE WASHINGTON STATE
UTILITIES AND TRANSPORTATION COMMISSION

CITY OF FIFE,)	
)	
Petitioner,)	DOCKET TR-100098
)	
v.)	JOINT MOTION FOR SIX-DAY
)	EXTENSION OF TIME FOR FILING
UNION PACIFIC RAILROAD,)	RESPONSIVE TESTIMONY
)	
Respondent.)	

The Respondent, Union Pacific Railroad (“UPRR”), by and through its attorney, Carolyn L. Larson, of Dunn Carney Allen Higgins & Tongue LLP, the City of Fife (“City”), by and through its attorney, Loren D. Combs, of VSI Law Group, PLLC, and the staff of the Washington Utilities and Transportation Commission (“UTC”), by and through their attorney, Fronda Woods, Assistant Attorney General, hereby stipulate to and request that the Commission enter an Order extending the deadline for filing rebuttal testimony and exhibits and cross-answering testimony and exhibits from September 24, 2010, to September 30, 2010. The extension of time is requested for two reasons:

(1) The UTC staff has served UPRR with interrogatories that will be due on September 23 (not including any extension of the due date that UPRR may find it necessary

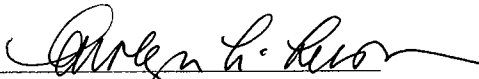
1 to seek). Even if UPRR is able to respond by September 23, 2010, the UTC will have
2 inadequate time to review the responses in time to prepare its responsive testimony; and

3 (2) UPRR and the City continue to explore settlement options, with the goal of
4 having a proposal the Fife City Council can review at its September 21 work session or
5 September 28 council meeting. If successful, the parties will seek a further amendment to
6 the procedural schedule to vacate the due date for responsive testimony and set back the
7 hearing to give time for UPRR, the City and the UTC staff to formalize the settlement.

8 DATED this 17 day of September, 2010.

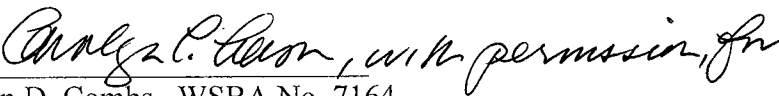
9 Presented by:

10 DUNN, CARNEY, ALLEN, HIGGINS &
11 TONGUE, LLP

12
13 By: 
14 Carolyn Larson, WSBA No. 29016
15 Attorneys for Union Pacific Railroad

16 Approved as to Form, and Notice of
17 Presentment Waived:

18 VSI Law Group, PLLC

19
20 By: 
21 Loren D. Combs, WSBA No. 7164
22 Attorneys for City of Fife

23 ///

24 ///

///

- 2 JOINT MOTION FOR SIX-DAY EXTENSION OF TIME FOR FILING RESPONSIVE TESTIMONY
DUNN CARNEY ALLEN HIGGINS & TONGUE LLP

DCAPDX_n631696_v1_Joint_Mot_for_6-
day_Ext_for_Filing_Responsive_Testimony.docUNI45-4

Attorneys at Law
851 SW Sixth Avenue, Suite 1500
Portland, OR 97204-1357
503.224.6440

1 Approved as to Form, and Notice of
2 Presentment Waived:

3 WASHINGTON STATE ATTORNEY
4 GENERAL'S OFFICE

5 By: *Chalyn L. Larson, with permission, for*
6 Fronda Woods, WSBA No. 18728
7 Attorneys for Staff of Washington Utilities
8 and Transportation Commission
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1 Approved as to Form, and Notice of
2 Presentment Waived:

3 WASHINGTON STATE ATTORNEY
4 GENERAL'S OFFICE

5 By: Frona Woods
6 Frona Woods, WSBA No. 18728
7 Attorneys for Staff of Washington Utilities
8 and Transportation Commission
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- 3 JOINT MOTION FOR SIX-DAY EXTENSION OF TIME FOR FILING RESPONSIVE TESTIMONY

1-631696-Joint_Mot_for_6-
day_Ext_for_Filing_Responsive_TestimonyUNI45-4

DUNN CARNEY ALLEN HIGGINS & TONGUE LLP

Attorneys at Law
851 SW Sixth Avenue, Suite 1500
Portland, OR 97204-1357
503.224.6440

1 **CERTIFICATE OF SERVICE**

2 I hereby certify that on the date set forth below, I filed by overnight mail the
3 original of the JOINT MOTION FOR SIX-DAY EXTENSION OF TIME FOR FILING
4 RESPONSIVE TESTIMONY with the State of Washington Utilities and Transportation
5 Commission, and on the same date and in the same manner served a true and correct copy
6 or copies of the same on:

7 Executive Director and Secretary _____ By hand delivery
Washington Utilities & Transportation Commission _____ By first-class mail
8 1300 S. Evergreen Park Drive S.W. By email
P.O. Box 47250 By overnight mail
9 Olympia, WA 98504-7250 _____ By facsimile transmission
records@wutc.wa.gov

10
11 Honorable Patricia Clark _____ By hand delivery
12 pclark@utc.wa.gov _____ By first-class mail
 By email
13 Administrative Law Judge _____ By overnight mail
_____ By facsimile transmission

14
15 Loren Combs _____ By hand delivery
City Attorney By first-class mail
16 VSI Law Group, PLLC By email
3600 Port of Tacoma Road, Suite 311 _____ By overnight mail
17 Tacoma, WA 98424 _____ By facsimile transmission
ldc@vsilawgroup.com

18 Attorneys for City of Fife

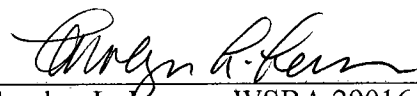
19
20 Fronda Woods _____ By hand delivery
Assistant Attorney General By first-class mail
1400 S. Evergreen Park Drive. S.W. By email
21 P.O. Box 40128 _____ By overnight mail
Olympia, WA 98504-0128 _____ By facsimile transmission
22 fwoods@utc.wa.gov

23 Attorneys for WUTC Staff

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DATED this 17 day of September, 2010.



Carolyn L. Larson, WSBA 29016
Dunn Carney Allen Higgins & Tongue LLP
851 SW Sixth Avenue, Suite #1500
Portland, Oregon 97204
Of Attorneys for Respondent