

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

WASHINGTON UTILITIES AND  
TRANSPORTATION COMMISSION,  
Complainant,

v.

CENTURYLINK COMMUNICATIONS,  
LLC,

Respondent.

DOCKET UT-181051

DECLARATION OF DANIEL J.  
TEIMOURI IN SUPPORT OF  
COMMISSION STAFF'S MOTION  
FOR PROTECTIVE ORDER

1 I, Daniel J. Teimouri, under penalty of perjury under the laws of the state of Washington,  
declare as follows.

2 I am over 18 years of age and competent to be a witness.

3 I am employed by the Office of the Attorney General as an Assistant Attorney General. I have  
been employed in this position for three and a half years.

4 On September 9, 2022, counsel for the CenturyLink Communications, LLC, contacted counsel  
for Staff seeking dates on which to schedule a deposition of Dr. Robert Akl. After consulting  
with Dr. Akl about the time and resources needed for Dr. Akl to prepare for and attend a  
prospective deposition in this matter, the estimated expense to Commission staff would be at  
least \$25,000 for Dr. Akl alone.

DATED at Lacey, Washington, and effective this 14th day of September, 2022.

/s/ Daniel J. Teimouri  
DANIEL J. TEIMOURI