

FILED

2014 OCT 21 A 10:23

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3
4 THE STATE OF WASHINGTON
5 OFFICE OF THE INSURANCE COMMISSIONER

6 In Re the Matter of

Matter NO. 14-0117

7
8 Global Warranty Group, LLC, and Wireless
9 Protection Program Association, and Arthur
10 Krantz, Charles S. Pipia, and Andrew J.
11 Schenker,

Respondents' Reply
RE: Request For Continuance

12 Respondents.

13 **COME NOW** Respondents, by and through there undersigned counsel, and
14 hereby reply to OIC's Response to Global Warranty's Motion for Continuance.

15 Respondents and their undersigned counsel (hereafter referred to in the first
16 person for convenience) appreciate the comments of Mr. Colman and the OIC in their
17 Response to my Motion for Continuance, and I acknowledge that they may have
18 misinterpreted the Motion and my declaration as implying that the timing of my receipt
19 of the OIC's discovery documents was intentional or designed to create a hardship for
20 Respondents. I have never thought that and it certainly was not my intent to give that
21 impression. For any such unintended inference, I offer an apology to Mr. Colman and
22 the OIC.

23 Because the parties, at the Respondents' request, had already agreed to and the
24 Hearing Officer had already granted an extension of the hearing date, I decided to

Respondents' Reply - 1

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1 request a second continuance by means of a more formal Motion for Continuance so
2 that I could set out a factual basis to support Respondents' request for a second
3 extension of the hearing date. My motion was motivated purely by facts as they had
4 developed, and I considered the Motion to be the preferred procedural vehicle to note
5 the current state of affairs.

6 Those facts on which my Motion for Continuance was based remain to this day,
7 namely, that the OIC did produce a large volume of documents, as Mr. Colman notes in
8 his Response, and that I am still in the process of reviewing those documents, page by
9 page, to determine their relative merit and effect on this pending Matter.

10 I appreciate also that the OIC does not object to a short continuance of this
11 Matter, and I join in their request that the Presiding Officer grant a one-month
12 continuance of this Matter to early December 2014, subject to the convenience of the
13 Hearings Unit and subject also to the respective schedules of the Hearing Officer and of
14 the representatives of both parties.

15
16 DATED this 21st day of October, 2014

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18 KREGER BEEGHLY, PLLC

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20 Brian F. Kieger,
21 WSBA Number 10670

22 Attorney for Licensees
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CERTIFICATE OF SERVICE

I, Brian F. Kreger, under penalty of perjury under the laws of the State of Washington do hereby declare and certify that I personally served and caused to be delivered by Electronic (e-mail) Delivery the foregoing Respondents' Reply RE: Motion for Continuance on the following parties or persons at the last known addresses given below:

e-Mailed To:
Hearings Unit
Office of the Insurance Commissioner
P.O. Box 40255
Olympia, WA 98504-0255
Attention: George Finkle, Hearing Officer
gfinkle@jdrllc.com
Attention: Kelly Cairns
KellyC@oic.wa.gov

e-Mailed To:
Mr. Darryl E. Colman
Office of the Insurance Commissioner
P.O. Box 40255
Olympia, WA 98504-0255
DarrylC@oic.wa.gov

Executed on this 21st day of October, 2014 in Seattle, Washington.


Brian F. Kreger