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BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON
UM 1265

AMERICAN CIVIL LIBERTIES UNION
OF OREGON, INC. and AMERICAN
CIVIL LIBERTIES UNION
FOUNDATION OF OREGON, INC.,

Complainants,

v.

VERIZON NORTHWEST, INC., and
QWEST CORPORATION,

Defendants.

REQUEST FOR JUDICIAL NOTICE IN
SUPPORT OF COMPLAINANTS'
OPPOSITION TO VERIZON'S MOTION
TO DISMISS

Pursuant to Oregon Rules of Evidence 201, *et seq.* and the Declaration of
Laura Caldera Taylor in Support of Request for Judicial Notice Concerning
Complainants' Opposition to Verizon's Motion to Dismiss ("Taylor Declaration") filed
herewith, Complainant respectfully requests the Court to take judicial notice of each
of the following documents which are attached as exhibits to the Taylor Declaration:

Public Utilities Commission Documents


Pursuant to ORE 201, *et seq.* Complainants request that this Commission
take judicial notice of the following documents on file with the public utilities
commissions listed below. The Commission can take judicial notice of these

1 documents because they are “capable of accurate and ready determination by resort
2 to sources whose accuracy cannot reasonably be questioned.” See ORE 201(b).

- 3 • Vermont Order on Motion to Dismiss, dated September 18, 2006;
- 4 • 2004 Ore. PUC LEXIS 10;
- 5 • May 3, 2006 letter from Andie Arthurholtz, Nevada Compliance
- 6 Investigator to Gary Peek, Executive Director, ACLU of Nevada;
- 7 • May 3, 2006 letter from Andie Arthurholtz, Nevada Compliance
- 8 Investigator to Gary Peek, Executive Director, ACLU of Nevada;
- 9 • Vermont Orders Opening Investigation of Verizon, dated June 27, 2006;
- 10 • Vermont Orders Opening Investigation and Notice of Prehearing
- 11 Conference regarding AT&T, dated June 29, 2006.

12
13 DATED this 27th day of October, 2006.

14 Respectfully submitted,
15 GARVEY SCHUBERT BARER

16
17 By 
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26
Attorneys for Complainants American
Civil Liberties Union of Oregon, Inc.
and American Civil Liberties Union
Foundation of Oregon, Inc.

CERTIFICATE OF SERVICE

I hereby certify that the foregoing REQUEST FOR JUDICIAL NOTICE IN SUPPORT OF COMPLAINANTS' OPPOSITION TO VERIZON'S MOTION TO DISMISS was served on:

Alex M. Duarte
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by mailing to them a copy of the original thereof, contained in sealed envelopes, addressed as above set forth, with postage prepaid, and deposited in the mail in Portland, Oregon, on October 27, 2006.



Laura Caldera Taylor
Of Attorneys for Complainants

PDX_DOCS:381659.1 [30186-00114]