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KING COUNTY  
SUPERIOR COURT CLERK  
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CASE #: 25-2-37787-3 SEA

SUPERIOR COURT OF THE STATE OF WASHINGTON  
KING COUNTY

CENTRAL PUGET SOUND REGIONAL  
TRANSIT AUTHORITY dba SOUND  
TRANSIT, a Washington State Regional  
Transit Authority,

Plaintiff,

v.

KIEWIT-HOFFMAN EAST LINK  
CONSTRUCTORS dba KIEWIT-HOFFMAN  
JV, a Washington Joint Venture; and KIEWIT  
INFRASTRUCTURE WEST  
CORPORATION, a Foreign Profit  
Corporation,

Defendants.

No. 25-2-37787-3 SEA

MOTION FOR LIMITED ADMISSION  
PURSUANT TO APR 8(b)  
(PRO HAC VICE)

**I. RELIEF REQUESTED**

The Moving Party named below moves the court for the limited admission of the Applicant for Limited Admission named below for the purpose of appearing as a lawyer in this proceeding.

**Identity of Moving Party** (Washington State Bar Association Member):

Name: Peter A. Talevich WSBA No. 42644

Address: K&L Gates, LLP, 925 4th Ave., Suite 2900, Seattle, WA 98104

Telephone: (206) 623-7580 Email: Peter.Talevich@klgates.com

MOTION FOR LIMITED ADMISSION  
PURSUANT TO APR 8(b)  
(PROV HAC VICE) - 1

K&L GATES LLP  
925 FOURTH AVENUE SUITE 2900  
SEATTLE, WASHINGTON 98104-1158  
TELEPHONE: (206) 623-7580  
FACSIMILE: (206) 623-7622

1           **Identity of Applicant for Limited Admission:**

2           Name:           Mark O. Masterson           Bar No. 490598

3           Jurisdiction of Primary Practice: Florida

4           Address:       Moye, O'Brien & Masterson, LLP, 800 South Orlando Ave., Maitland,  
5                               FL 32751

6           Telephone:   (407) 622-5250                   Email: mmasterson@moyeobrien.com

7                               **II.     STATEMENT OF THE FACTS**

8           Mark O. Masterson is a member in good standing of the Bar of Florida. Mr. Masterson  
9           has never been disbarred by any court or state, nor has he ever been the subject of any  
10          disciplinary proceedings. Mr. Masterson represents Defendants Kiewit-Hoffman East Link  
11          Constructors d/b/a Kiewit-Hoffman JV and Kiewit Infrastructure West Corporation.  
12

13                           **III.    STATEMENT OF THE ISSUE**

14          The following issue is presented for resolution by the court:

15          Should the Applicant for Limited Admission named above be granted limited admission  
16          to the practice of law pursuant to APR 8(b) for the purpose of appearing as a lawyer in this  
17          proceeding?  
18

19                           **IV.    EVIDENCE RELIED UPON**

20          This motion is based on the accompanying certifications of the Moving Party and the  
21          Applicant for Limited Admission.

22                           **V.     LEGAL AUTHORITY**

23          This motion is made pursuant to Rule 8(b) of the Admission to Practice Rules (APR).  
24

25                           **VI.    PROPOSED ORDER**

26          A proposed order granting the relief requested accompanies this motion.

1 RESPECTFULLY SUBMITTED this 27th day of January, 2026.

2  
3   
4 PETER A. TALEVICH, WSBA No. 42644  
5 [peter.talevich@klgates.com](mailto:peter.talevich@klgates.com)  
6 Attorneys for Defendants

7 **CERTIFICATION OF APPLICANT FOR LIMITED ADMISSION**

8 I hereby certify under penalty of perjury under the laws of the State of Washington that:

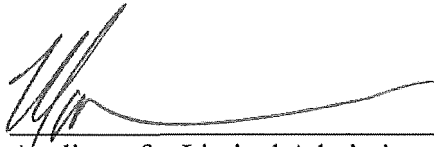
9 I am a member in good standing of the bar of the state or territory of the United States  
10 or of the District of Columbia listed above as my jurisdiction of primary practice.

11 I have read the Rules of Professional Conduct adopted by the Supreme Court of the  
12 State of Washington and agree to abide by them.

13 I have complied with all of the requirements of APR 8(b).

14 I have read the foregoing motion and certification and the statements contained in it are  
15 full, true and correct.

16 Signed on January 27, 2026 at Maitland, Florida.

17   
18  
19 Applicant for Limited Admission

20 **CERTIFICATION OF MOVING PARTY/WSBA MEMBER**

21 I hereby certify under penalty of perjury under the laws of the State of Washington that:

22 1. I am an active member in good standing of the Washington State Bar Association.


23 I will be the lawyer of record in this proceeding, responsible for the conduct of the  
24 applicant, and present at proceedings in this matter unless excused by the court.  
25  
26

1 Moving Party or Applicant are submitting a copy of this motion together with the  
2 required fee of \$488 to the Washington State Bar Association, 1325 4<sup>th</sup> Ave., Ste. 600, Seattle,  
3 WA 98101-2539.

4 I have complied with all of the requirements of APR 8(b).

5 I have read the foregoing motion and certification and the statements contained in it are  
6 full, true and correct.  
7

8 Signed on January 27, 2024 at Seattle, Washington.

9  
10   
11 PETER A. TALEVICH WSBA No. 42644  
12 [peter.talevich@klgates.com](mailto:peter.talevich@klgates.com)  
13 Attorneys for Defendants  
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1 **CERTIFICATE OF SERVICE**

2 I, Suzanne M. Petersen, declare as follows:

3 I certify under penalty of perjury under the laws of the state of Washington that on  
4 January 27, 2026, a true and correct copy of the foregoing document was sent for service on the  
5 following persons as indicated below:  
6

7 Stanton P. Beck, WSBA #16212  
8 Andrew J. Gabel, WSBA #39310  
9 Ballard Spahr LLP  
10 1301 Second Avenue Suite 2800  
11 Seattle, WA 98101  
12 Telephone: (206) 223-7000  
13 Email: [becks@ballardspahr.com](mailto:becks@ballardspahr.com)  
14 [gabela@ballardspahr.com](mailto:gabela@ballardspahr.com)

Via KC Script and E-mail

15 *Attorneys for Plaintiff*

16 DATED January 27, 2026 in Seattle, Washington.

17 s/ Suzanne M. Petersen  
18 Suzanne M. Petersen  
19 Legal Assistant  
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7 SUPERIOR COURT OF THE STATE OF WASHINGTON  
KING COUNTY

8 CENTRAL PUGET SOUND REGIONAL  
9 TRANSIT AUTHORITY dba SOUND  
10 TRANSIT, a Washington State Regional  
Transit Authority,

11 Plaintiff,

12 v.

13 KIEWIT-HOFFMAN EAST LINK  
14 CONSTRUCTORS dba KIEWIT-HOFFMAN  
JV, a Washington Joint Venture; and KIEWIT  
15 INFRASTRUCTURE WEST  
CORPORATION, a Foreign Profit  
16 Corporation,

17 Defendants.

No. 25-2-37787-3 SEA

(PROPOSED) ORDER GRANTING  
MOTION FOR LIMITED ADMISSION  
PURSUANT TO APR 8(b)

18 **I. BASIS**

19 A Motion For Limited Admission Pursuant To APR(8)(b) (PRO HAC VICE) and the  
20 attached Certification of Application for Limited Admission and Certificate of Moving Party  
21 (WSBA Member) has been presented by Peter A. Talevich, WSBA No. 42644.

22 **II. FINDINGS**

23  
24 (1) Mark O. Masterson qualifies for Pro Hac Vice Admission and has complied with all of  
25 the requirements of APR (8)(b);  
26

1 (2) Peter A. Talevich, an active member in good standing of the Washington State Bar  
2 Association, will be the lawyer of record in this proceeding, will be responsible for the  
3 conduct of Mark O. Masterson and present at proceedings in this matter unless excused  
4 by the Court.

5 (3) Peter A. Talevich has provided evidence establishing that he has submitted a copy of  
6 the motion and the required fee to the Washington State Bar Association.  
7

### 8 III. ORDER

9 It is hereby ORDERED that Mark O. Masterson is admitted to practice as a lawyer in  
10 this proceeding pursuant to APR 8(b). Peter A. Talevich, an active member in good standing  
11 of the Washington State Bar Association, will be the lawyer of record in this proceeding, will  
12 be responsible for the conduct of Mark O. Masterson and present at proceedings in this matter  
13 unless excused by the Court.  
14

15 Dated \_\_\_\_\_.

16  
17 \_\_\_\_\_  
18 Judge David Whedbee

19 Presented By:

20 K&L GATES LLP

21 By s/ Peter A. Talevich

22 Peter A. Talevich, WSBA # 42644

23 Abraham M. Weill, WSBA # 58663

24 K&L Gates, LLP

25 925 Fourth Avenue, Suite 2900

26 Seattle, WA 98104

Telephone: (206) 623-7580

Email: [peter.talevich@klgates.com](mailto:peter.talevich@klgates.com)

[abe.weill@klgates.com](mailto:abe.weill@klgates.com)

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I, Suzanne M. Petersen, declare as follows:

I certify under penalty of perjury under the laws of the state of Washington that on January 27, 2026, a true and correct copy of the foregoing document was sent for service on the following persons as indicated below:

Stanton P. Beck, WSBA #16212  
Andrew J. Gabel, WSBA #39310  
Ballard Spahr LLP  
1301 Second Avenue Suite 2800  
Seattle, WA 98101  
Telephone: (206) 223-7000  
Email: [becks@ballardspahr.com](mailto:becks@ballardspahr.com)  
[gabela@ballardspahr.com](mailto:gabela@ballardspahr.com)

Via KC Script and E-mail

*Attorneys for Plaintiff*

DATED January 27, 2026 in Seattle, Washington.

s/ Suzanne M. Petersen

Suzanne M. Petersen  
Legal Assistant