

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

SHUTTLE EXPRESS, INC.,

Petitioner and Complainant,

v.

SPEEDISHUTTLE WASHINGTON, LLC,

Respondent.

DOCKET NOS.

TC-143691,

TC-160516, and

TC-161257 (consolidated)


**DECLARATION OF WESLEY MARKS
IN SUPPORT OF MOTION FOR STAY
OF SHUTTLE EXPRESS, INC.**

- 1 I, Wesley Marks, am the Director of Compliance of Petitioner Shuttle Express, Inc. ("Shuttle Express" or "Petitioner"). I make this declaration based on personal knowledge and my experience working with Shuttle Express for roughly six (6) years.
- 2 Shuttle Express has been losing money for some time and continues to lose money on an annual basis today. Through the end of September, Shuttle Express has lost over \$1.2 million representing nearly 10% of all gross revenues year to date. Since Speedishuttle entered the market in King County, Shuttle Express has needed over \$2.0 million in capital infusions and uses of lines of credit to cover losses and other capital needs.

- 3 The airport ground transportation market at SeaTac is highly seasonal. Shuttle Express generally incurs substantial losses from about October through April and only makes money from May through September.
- 4 Despite massive capital infusions in the last few years, Shuttle Express currently does not have \$120,000 of excess working capital. Current working capital is allocated to covering seasonal losses and maintaining the current or projected level of service.
- 5 In order to pay the \$120,000 penalty in 30 days, Shuttle Express would either have to: 1) reduce service levels and quality, 2) obtain a further capital infusion, 3) obtain additional bank loans, or 4) do some combination of the foregoing. At this time Shuttle Express does not know which of these options could or would be exercised if the penalty is not stayed.

I declare under penalty of perjury under the laws of the State of Washington that the statements in this declaration are true and correct to the best of my knowledge, information, and belief.

Executed at Renton, Washington, this 21st day of November, 2017.


11-21-2017

Wesley Marks

CERTIFICATE OF SERVICE

I hereby certify that on November 21, 2017, I electronically served via email the foregoing Declaration on behalf of Shuttle Express, Inc. to:

<p>Julian Beattie Office of the Attorney General Utilities and Transportation Division 1400 S. Evergreen Park Dr. SW PO Box 40128 Olympia, WA 98504-0128 (360) 664-1192 Email: jbeattie@utc.wa.gov</p>	<p>David W. Wiley Blair I. Fassburg Williams Kastner Two Union Square 601 Union Street, Suite 4100 Seattle, WA 98101 (206) 233-2895 Email: dwiley@williamskastner.com Email: bfassburg@williamskastner.com</p>
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Dated at Tysons, Virginia this 21st day of November, 2017.

/s/

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