

BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION

SARAH HAND,

Complainant(s),

v.

RAINIER VIEW WATER COMPANY, INC.,

Respondent(s).

DOCKET UW-170924

DECLARATION OF DANIEL W. RANKIN
IN SUPPORT OF RESPONDENT'S
MOTION TO COMPEL RESPONSES TO
DATA REQUESTS

I, Daniel W. Rankin, declare as follows:

1. I am one of the attorneys representing Respondent Rainier View Water Company, Inc. in this action.

2. I am competent to testify and am over 18 years old. I make this declaration based upon my own personal knowledge.

3. Attached to this declaration as **Exhibit 1** is a true and correct copy of an email to Complainant's Counsel, Nigel Malden dated April 27, 2018.

4. Attached to this declaration as **Exhibit 2** is a true and correct copy of an email to Complainant's Counsel, Nigel Malden, dated May 8, 2018.

EXHIBIT 1

From: Daniel Rankin
Sent: Friday, April 27, 2018 2:42 PM
To: 'Nigel Malden'; Roberson, Jeff (UTC)
Cc: Ana Todakonzie; Anna Lee; 'Gross, Krista (UTC)'; 'bdemarco@utc.wa.gov'; 'Brown, Sally (UTC)'; 'rickfinn@localaccess.com'
Subject: Hand v. Rainier View Water Company, Docket UW 170924

Nigel,

Confirming our prior discussion about upcoming deadlines: 1) I'll anticipate your client's responses to our discovery requests within the coming week. 2) You've granted an extension for my client to submit written testimony until Thursday, May 3 (although I will submit it prior to May 3, if I am able).

Jeff, given these extension, we also agreed to offer a similar extension for any testimony to be submitted by the UTC, if you would like it.

Please advise if you have any questions.

Thanks,

Dan

EXHIBIT 2

From: Daniel Rankin
Sent: Tuesday, May 08, 2018 8:36 PM
To: 'Nigel Malden'; Anna Lee
Cc: Ana Todakonzie; Chetana Williamson
Subject: hand v. RVWC

Hi Nigel,

When we last spoke, you committed to getting me your client's responses to my discovery requests by the end of last week. Please advise when I can expect the responses, or if I need to start a motion to compel.

Thanks,

Dan