

BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION

SARAH HAND AND GRETCHEN HAND,
a married couple

Complainant,

v.

RAINIER VIEW WATER COMPANY, INC.,

Respondent.

DOCKET UW 170924

**DECLARATION OF NIGEL MALDEN
IN OPPOSITION OF MOTION TO
COMPEL DISCOVERY**

I, Nigel Malden, hereby declare:

1. I submit this declaration in opposition to Rainier View Water Company’s (“Rainier View”) motion to compel discovery.
2. At this point, I believe we have given more than enough information to Rainier View over the course of 12 months for purposes of this administrative hearing including a deposition of my client on April 20, 2018.
3. Attached as **Exhibit 1** is a true and correct copy of Rainier View’s interrogatories and request for production answered by Sarah Hand in June of 2017 (with exhibits omitted).
4. Attached as **Exhibit 2** are further responses to the latest round of discovery served by Rainier View which I am providing now to clarify our objections and our prior production of similar or identical materials.

- 1 5. Given the scope of the issues and the limited remedies available in this proceeding,
2 Rainier View has been given more than enough information.
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4 6. Ms. Hand's private and personal E-mail communications with her family, friends,
5 neighbors and so forth have no relevance to matters at issue in this hearing.
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7 7. For these reasons, Sarah hand requests an order denying the motion to compel discovery.

8 Dated this 21th day of June, 2018

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12 Nigel S. Malden, WSBA No. 15643
13 Attorney for Sarah Hand, Complainant
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