

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

**EXHIBIT 2 TO DECLARATION OF  
NIGEL MALDEN IN OPPOSITION TO  
MOTION TO COMPEL DISCOVERY**

**EXHIBIT 2**

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

**June 21, 2018**

Sarah Hand's Answers to Second Set of Request For Production

from Rainier View Water Company, Inc.

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

BEFORE THE WASHINGTON  
UTILITIES AND TRANSPORTATION COMMISSION

SARAH HAND,  
  
Complainant,  
  
v.  
  
RAINIER VIEW WATER COMPANY, INC.,  
  
Respondent.

DOCKET UW-170924

**SARAH HAND'S ANSWERS TO RAINIER  
VIEW WATER COMPANY, INC.'S  
DOCUMENT REQUEST TO PLAINTIFF  
SARAH HAND**

**TO: RVWC**  
**AND TO: COUNSEL OF RECORD Dan Rankin, Attorney for Respondent**

**DOCUMENT REQUEST**

**DOCUMENT REQUEST NO. 1:** Please produce any and all written, graphic materials, photographs, slides, video and/or other imaging depicting and/or relating to the incident alleged in your Complaint, and the injuries and damages you allege you have sustained including setting forth the date, time, place taken, recorded, and/or created, and the person who took, recorded and/or created same.

**RESPONSE: No further documents shall be produced. Refer to documents produced by Sarah Hand to Rainier View Water Company in Pierce County Superior Court Case No. 17-2-05538-2.**

1 **DOCUMENT REQUEST NO. 2:** Please produce any written or recorded statements from any  
2 witnesses concerning this action including setting forth the date, time, place taken, recorded,  
3 and/or created, and the person who took, recorded and/or created same. If any documents are  
4 withheld as privileged, please provide who made the statement, who requested that the  
5 statement be made, and when the statement was given.

6 **RESPONSE: No further documents shall be produced. Refer to documents produced by**  
7 **Sarah Hand to Rainier View Water Company in Pierce County Superior Court Case No.**  
8 **17-2-05538-2.**

9  
10 **DOCUMENT REQUEST NO. 3:** Please produce the types and dates of any and all inspections,  
11 tests, or investigations done to your home, including the name, address, and phone of each  
12 person or facility that performed the inspection, tests, or investigation, and results and/or  
13 findings for each.

14 **RESPONSE: Objection, work product privilege.**

15  
16 **DOCUMENT REQUEST NO. 4:** Please produce any inspections, tests, or investigations you,  
17 the HOA, any other homeowner, or any other person or entity has performed or caused to be  
18 performed on water from Defendant, including the name, address and phone of each person  
19 and facility that performed the inspection, test, or investigation, type of inspection, test, or  
20 investigation, the date of the test/investigation, and result or findings of each inspection, test, or  
21 investigation. Please also describe any actions taken by you or others as a result of each  
22 inspection, test, or investigation.

23 **RESPONSE: Objection, work product privilege. Without waiving objections, Sarah Hand**  
24 **is unaware of any other water tests done outside her residence on the behalf of any**  
25 **homeowner in Springwood Estates or on behalf of the HOA.**

1 **DOCUMENT REQUEST NO. 5:** Please produce a copy of all water tests and/or test results for  
2 all water tests conducted at your home, including any remaining samples and chains of custody  
3 of samples tested.

4 **RESPONSE: Objection, work product privilege.**

5  
6 **DOCUMENT REQUEST NO. 6:** Please produce a copy of all water tests and/or test results for  
7 any water test conducted by any person or facility on behalf of any homeowner in Springfield  
8 Estates or on behalf of the HOA in the last 10 years.

9 **RESPONSE: Sarah Hand is unaware of any other water tests done outside her residence**  
10 **on the behalf of any homeowner in Springwood Estates or on behalf of the HOA in the**  
11 **last 10 years.**

12  
13 **DOCUMENT REQUEST NO. 7:** Please produce a copy of any all documents, including, but not  
14 limited to emails, newsletters, texts, correspondence from any homeowner in Springfield Estates  
15 and/or the HOA concerning water contamination, water quality, and/or Defendant.

16 **RESPONSE: No further documents shall be produced. Refer to documents produced by**  
17 **Sarah Hand to Rainier View Water Company in Pierce County Superior Court Case No.**  
18 **17-2-05538-2.**

19  
20 **DOCUMENT REQUEST NO. 8:** Please produce a copy of any all appraisals or other valued  
21 home or assessments done on your home.

22 **RESPONSE: No further documents shall be produced. Refer to 2015 home inspection**  
23 **report produced by Sarah Hand to Rainier View Water Company in Pierce County**  
24 **Superior Court Case No. 17-2-05538-2.**

1 **DOCUMENT REQUEST NO. 9:** lease produce a copy of any all documents, including, but not  
2 limited to receipts, invoices, payments, credit card statements or emails, for any replacement,  
3 maintenance, or repairs or replacement to your home related to your plumbing fixtures and/or  
4 pipe work, including inspection or replacement of pipes, plumbing, water heaters, waterlines,  
5 pressure reduction valves, fittings, and/or fixtures performed by any person or entity since you  
6 purchased the home.

7 **RESPONSE: No further documents shall be produced. Refer to documents produced by**  
8 **Sarah Hand to Rainier View Water Company in Pierce County Superior Court Case No.**  
9 **17-2-05538-2.**

10  
11 **DOCUMENT REQUEST NO. 10:** For each of your retained experts, please produce the expert's  
12 CV, documents relied on and documents provided to each of your experts, and draft reports and  
13 reports from each of your experts.

14 **RESPONSE: Objection, work product privilege.**

15  
16 **DOCUMENT REQUEST NO. 11:** Please produce copies of all correspondence, including  
17 letters, emails, text messages, or written notes that you have sent or received concerning water  
18 contamination, your lawsuit, or any of your alleged injuries or damages that are in the  
19 possession of you, your attorney, or anyone acting on your behalf that are not attorney-client  
20 privileged.

21 **RESPONSE: Objection work product privilege. Without waiving objections, refer to**  
22 **documents produced by Sarah Hand to Rainier View Water Company in Pierce County**  
23 **Superior Court Case No. 17-2-05538-2.**

1 **DOCUMENT REQUEST NO. 12:** Please produce any and all documents that support all losses,  
2 expenses, special and general damages, economic and non-economic, which are you are  
3 claiming were incurred by you as a result of the incident alleged in the Complaint.

4 **RESPONSE: No further documents shall be produced. Refer to documents produced by**  
5 **Sarah Hand to Rainier View Water Company in Pierce County Superior Court Case No.**  
6 **17-2-05538-2.**

7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

RESPONSES DATED this 15th day of June, 2018.  
NIGEL MALDEN LAW, PLLC



Prepared By \_\_\_\_\_  
Nigel S. Malden, WSBA #15643  
Attorneys for Complainant, Sarah Hand