
BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

STERICYCLE OF WASHINGTON, INC.,

Complainant,

v.

WASTE MANAGEMENT OF
WASHINGTON, INC., d/b/a WM
HEALTHCARE SOLUTIONS OF
WASHINGTON,

Respondent.

Docket No. TG-121597

[PROPOSED] SUBPOENA

AND

SUBPOENA DUCES TECUM FOR
PRODUCTION OF DOCUMENTS

The State of Washington to Aramark, Inc.:

You are commanded to appear to testify at the taking of a deposition in the above proceeding at 9:30 am on August 20, 2013 at Garvey Schubert Barer, 1191 2nd Avenue, 18th Floor, Seattle, WA, 98101, or at an alternative time, date, and place to be agreed upon between Aramark and legal counsel for Stericycle of Washington, Inc., to give testimony and evidence under oath concerning communications, solicitations, or negotiations between Valley Medical Center (or Aramark on behalf of Valley Medical Center) and Waste Management relating to medical waste and/or recycling collection, transportation, processing and treatment services at Valley Medical Center. As an organization not a party to this proceeding you shall designate one or more officers, directors, managing agents or other persons who consent to testify on your behalf and who shall testify as to matters known or reasonably available to Aramark consistent with Civil Rule 30(b)(6). At your discretion this person may be Neal Trebbe or another representative. This deposition may be conducted telephonically upon agreement between Aramark and legal counsel for Stericycle of Washington, Inc. This is ordered pursuant to the subpoena powers granted in RCW 34.05.446, RCW 80.01.060(1) and RCW 81.04.510.

You are further commanded to bring with you the following documents:

For the time period of January 1, 2010 to the present, all documents and other records relating to: communications or solicitations by Waste Management to provide medical waste and/or recycling collection, transportation, processing and treatment services to Valley Medical Center

or negotiations with Waste Management concerning such services. This request includes but is not limited to communications between Valley Medical Center (or Aramark on behalf of Valley Medical Center) and Waste Management or communications internal to Valley Medical Center (or Aramark on behalf of Valley Medical Center), including email communications.

In lieu of producing these documents at the deposition, you may mail a copy of the subpoenaed documents to legal counsel for Stericycle of Washington, Inc., together with your certification that the items produced are true and correct copies of the subpoenaed documents. If you choose to produce the subpoenaed documents by mailing them rather than producing them at the proceeding, the subpoenaed documents must be received by legal counsel for Stericycle of Washington, Inc. by a mutually agreeable date prior to the date set out above for the deposition.

DATED at Olympia, Washington, and effective July __, 2013.

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

ADAM E. TOREM
Administrative Law Judge