
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 Skagit Valley Hospital:

You are commanded to appear to testify at the taking of a deposition in the above proceeding at 9:30 am on August 15, 2013 at Skagit Valley Hospital, 1415 E. Kincaid Street, Mount Vernon, WA, 98273, or at an alternative time, date, and place to be agreed upon between Skagit Valley Hospital and legal counsel for Stericycle of Washington, Inc., to give testimony and evidence under oath concerning the integrated service agreement between Skagit Valley Hospital and Waste Management for the provision of services including medical waste and recycling collection, transportation, processing and treatment services, and solicitations, negotiations or other communications related to such services. 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 Skagit Valley Hospital consistent with Civil Rule 30(b)(6). At your discretion this person may be Richard Delaney or another representative. 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: solicitations by Waste Management to provide medical waste and/or recycling collection, transportation, processing and treatment services; negotiations with Waste Management concerning such services; and the execution of the integrated service agreement between Skagit

Valley Hospital and Waste Management related to such services. This request includes but is not limited to communications between Skagit Valley Hospital and Waste Management or communications internal to Skagit Valley Hospital, including email communications. In addition, you must produce any documents or other records relating to the pricing, cost, or value of recycling services provided by Waste Management.

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