
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 Virginia Mason Medical Center and to Andy Flodin:

You are commanded to appear to testify at the taking of a deposition in the above proceeding at 9:30 am on August 16, 2013 at Virginia Mason Medical Center, 1100 Ninth Avenue, Seattle, WA 98101, or at an alternative time, date, and place to be agreed upon between Virginia Mason Medical Center, Andy Flodin, and legal counsel for Stericycle of Washington, Inc., to give testimony and evidence under oath concerning communications, solicitations, or negotiations between Virginia Mason Medical Center and Waste Management relating to medical waste and/or recycling collection, transportation, processing and treatment services. 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 or negotiations with Waste Management concerning such services. This request includes but is not limited to communications between Virginia Mason Medical Center and Waste Management or communications internal to Virginia Mason 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