

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  
26

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

In Re Application of  
WASTE MANAGEMENT OF  
WASHINGTON, INC.  
d/b/a WM Healthcare Solutions  
of Washington  
720 4th Ave. Ste 400  
Kirkland, WA 98033-8136

Docket No. TG-120033

DECLARATION OF JAMES RYAN IN  
SUPPORT OF STERICYCLE'S MOTION  
FOR LEAVE TO TAKE DEPOSITIONS

I, James Ryan, declare as follows:

1. I am over the age of 18 and am competent to testify. I make this declaration based on my personal knowledge and am competent to testify to the matters addressed herein.

2. I am the Major Account Executive for Stericycle of Washington, Inc. ("Stericycle") and have held that position since 2005. My responsibilities in this position include marketing and sales of Stericycle's biomedical waste collection services to hospitals and other larger volume customers in Washington State.

3 In February 2012, Stericycle's customer Northwest Hospital announced that it was terminating its contract with Stericycle for biomedical waste collection services. In the course of my discussions with Northwest Hospital's Environmental Services Manager Juan

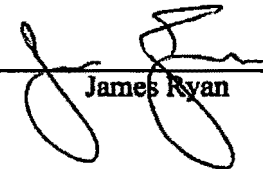
1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26

Escalante concerning this decision, Mr. Escalante informed me that Waste Management had offered to reduce the cost of its commercial recycling services to Northwest Hospital, which were already being provided by Waste Management, in exchange for Northwest Hospital agreeing to switch its biomedical waste collection business to Waste Management.

4. In addition to the information that was communicated to me by Mr. Escalante, I understand that Rose Hong, Northwest Hospital's Facilities Director was involved in considering Waste Management's offer and involved in the decision to switch Northwest Hospital's biomedical waste collection business from Stericycle to Waste Management.

I declare under penalty of perjury under the laws of the State of Washington and the United States that the foregoing is true and correct to the best of my knowledge and belief.

EXECUTED this 21<sup>st</sup> day of July, 2012 at Kent, Washington

By  \_\_\_\_\_  
James Ryan

DECLARATION OF JAMES RYAN IN SUPPORT OF  
STERICYCLE'S MOTION FOR LEAVE TO TAKE  
DEPOSITIONS - 2

GARVEY SCHUBERT BARER  
A PARTNERSHIP OF PROFESSIONAL CORPORATIONS  
eighteenth floor  
1191 second avenue  
seattle, washington 98101-2939  
206 464-3939

1 **CERTIFICATE OF SERVICE**

2 I, Vickie L. Owen, certify under penalty of perjury under the laws of the State of  
3 Washington that, on July 31, 2012, I caused to be served on the person(s) listed below in the  
4 manner shown a copy of DECLARATION OF JAMES RYAN IN SUPPORT OF  
5 STERICYCLE'S MOTION FOR LEAVE TO TAKE DEPOSITIONS:

6 Washington Utilities and  
7 Transportation Commission  
8 1300 S. Evergreen Park Dr. SW  
9 PO Box 47250  
10 Olympia, WA 98504-7250  
11 (360) 664-1160  
12 records@utc.wa.gov

- 13  Via Legal Messenger
- 14  Via Facsimile
- 15  Via U.S. Mail, First Class,  
16 Postage Prepaid
- 17  Via Email

18 Administrative Law Judge  
19 Gregory Kopta  
20 gkopta@utc.wa.gov

- 21  Via Email

22 Jessica Goldman  
23 Polly L. McNeill  
24 Summit Law Group  
25 315 – 5<sup>th</sup> Avenue South  
26 Seattle, WA 98104  
jessicag@summitlaw.com  
pollym@summitlaw.com  
kathym@summitlaw.com  
deannas@summitlaw.com

- 27  Via Legal Messenger
- 28  Via Facsimile
- 29  Via U.S. Mail, First Class,  
30 Postage Prepaid
- 31  Via Email


32 James K. Sells  
33 Attorney at Law  
34 PMB 22, 3110 Judson Street  
35 Gig Harbor, WA 98335  
36 jamesells@comcast.net  
cheryls@rsulaw.com  
*Attorney for Protestant WRRRA, Rubatino,  
Consolidated, Murrey's and Pullman*

- 37  Via Legal Messenger
- 38  Via Facsimile
- 39  Via U.S. Mail, First Class,  
40 Postage Prepaid
- 41  Via Email

1 Fronda Woods  
2 Office of the Attorney General  
3 Utilities and Transportation Division  
4 1400 S. Evergreen Park Drive SW  
5 PO Box 40128  
6 Olympia, WA 98504-0128  
7 (360) 664-1225  
8 (360) 586-5522 Fax  
9 fwoods@utc.wa.gov  
10 BDeMarco@utc.wa.gov  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26

- Via Legal Messenger
- Via Facsimile
- Via U.S. Mail, First Class,  
Postage Prepaid
- Via Email

Dated at Seattle, Washington this 31<sup>st</sup> day of July, 2012.

  
\_\_\_\_\_  
Vickie L. Owen  
vowen@gsblaw.com