

BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION

SARAH HAND AND GRETCHEN HAND,
a married couple

Plaintiff,

v.

RAINIER VIEW WATER COMPANY, INC.,

Defendant.

DOCKET UW 170924

**SARAH HAND’S EXHIBIT LIST FOR
CROSS EXAMINATION OF BOB
BLACKMAN AND RACHEL STARK**

**EXHIBITS TO BE USED IN CROSS-EXAMINATION OF
ROBERT BLACKMAN AND RACHEL STARK**

July 25, 2018

**SARAH HAND’S EXHIBIT LIST FOR CROSS
EXAMINATION OF BOB BLACKMAN AND
RACHEL STARK – DOCKET UW 170924**

NIGEL S. MALDEN LAW, PLLC
711 Court A, Suite 200
Tacoma, Wa. 98402
253-627-0393 p
844-273-6067 f

1 The complainant, Sarah Hand, submits the following list of exhibits for use in cross
 2 examination of witnesses Robert “Bob” Blackman and Rachel Stark on July 25, 2018 in
 3 Olympia, Washington.
 4

<u>Exhibit #</u>	<u>Document Source</u>	<u>Document</u>
SH-Exh-1T	Sarah Hand Testimony	Testimony of Sarah Hand
SH-Exh-1	Sarah Hand Testimony	Photo - Bottom Jug of Brown Water
SH-Exh-2	Sarah Hand Testimony	Photo - Full Jug of Brown Water
SH-Exh-3	Sarah Hand Testimony	Photo - Washing Machine Bleach Tray Brown Water
SH-Exh-4	Sarah Hand Testimony	Photo - Hole in Wall Release Valve Repair
SH-Exh-5	Sarah Hand Testimony	Photo - Old Toilet Basin
SH-Exh-6	Sarah Hand Testimony	Photo - New Toilet Sediment and Water Flushing in Bowl
SH-Exh-7	Sarah Hand Testimony	Facebook Springwood neighborhood discussion board
SH-Exh-8	Sarah Hand Testimony	Facebook Rainier View Water Company site and reviews
SH-Exh-9	Sarah Hand Testimony	RVWC Brown Water Work Orders
SH-Exh-10	Sarah Hand Testimony	2017 Rainier View Annual Water Quality Report for Southwood Water System
SH-Exh-11	Sarah Hand Testimony	Sarah Hand Water Bill
SH-Exh-12	Sarah Hand Testimony	WUTC Case Report of Sarah Hand Complaint
SH-Exh-13	Sarah Hand Testimony	WUTC Rachel Stark memo of telephone call with Sarah Hand dated 12-20-16
SH-Exh-14	Sarah Hand Testimony	UTC Hearing December 2016 Excerpt
SH-Exh-15	Sarah Hand Testimony	Email from UTC Stark to Blackman - complaint closed
SH-Exh-16	Sarah Hand Testimony	DOH Sanitary Survey November 2016
SH-Exh-21	Sarah Hand Testimony	Fir Meadows Water Tests 2013-2017
SH-Exh-22	Sarah Hand Testimony	Southwood History of Exceedances self-reported to DOH
SH-Exh-23	Sarah Hand Testimony	News Articles October 2015 and November 2016

28 **SARAH HAND'S EXHIBIT LIST FOR CROSS EXAMINATION OF BOB BLACKMAN AND RACHEL STARK - DOCKET UW 170924**

NIGEL S. MALDEN LAW, PLLC
 711 Court A, Suite 200
 Tacoma, Wa. 98402
 253-627-0393 p
 844-273-6067 f

1	SH-Exh-24	Sarah Hand Testimony	Sarah Hand water valve bill
2	BB-Exh-1T	Bob Blackman Testimony	Testimony of Bob Blackman
3	SH-Exh-2T	Sarah Hand Reply	Sarah Hand Reply Testimony
4	*SH-Exh-Rply-T-25	Sarah Hand Reply	Susan Evans CV
5	*SH-Exh-Rply-T-26	Sarah Hand Reply	Spectra Lab Service and Background
6	*SH-Exh-Rply-T-27	Sarah Hand Reply	Sarah Hand Residence Water Test Report
7	*SH-Exh-Rply-T-28	Sarah Hand Reply	Depo Excerpts of Michael Means, DOH
8	*SH-Exh-Rply-T-29	Sarah Hand Reply	UTC 2014 Investigation Report
9	RS-Exh-1T	Rachel Stark Testimony	Testimony of Rachel Stark
10	RS-Exh-2	Rachel Stark Testimony	Case Report for Sarah Hand's Complaint
11	RS-Exh-3	Rachel Stark Testimony	Email Stark and Blackman dated 11-16-16 through 11-18-16
12	RS-Exh-4	Rachel Stark Testimony	Email Stark and Blackman dated 11-22-16 through 11-28-16
13	RS-Exh-5	Rachel Stark Testimony	Email Stark and Blackman dated 12-06-16 through 12-08-16
14	RS-Exh-6	Rachel Stark Testimony	Email Stark, Cupp, Salo-Zieman dated 12-06-16
15	BB-Exh-2T	Bob Blackman Surreply	Surreply Testimony of Bob Blackman
16	BB-Exh-Rply-T-1	Bob Blackman Surreply	Timeline
17	BB-Exh-Rply-T-2	Bob Blackman Surreply	Fir Meadows 4 Iron and Manganese Treatment Results July 2017 through March 2018
18	BB-Exh-Rply-T-3	Bob Blackman Surreply	Rainier View Tariff
19	SH-Exh-X-30	Sarah Hand Exhibit List	APEX Engineering Report dated 12-09-2016
20	SH-Exh-X-31	Sarah Hand Exhibit List	Excerpt from 2009 DOH Water System Design Manual, "Secondary Contaminant Treatment Requirements and Options"
21	SH-Exh-X-32	Sarah Hand Exhibit List	WAC 246-290-010
22	SH-Exh-X-33	Sarah Hand Exhibit List	WAC 246-290-310
23	SH-Exh-X-34	Sarah Hand Exhibit List	WAC 246-290-050
24	SH-Exh-X-35	Sarah Hand Exhibit List	WAC 246-290-320
25	SH-Exh-X-36	Sarah Hand Exhibit List	WAC 480-110-385

SARAH HAND'S EXHIBIT LIST FOR CROSS EXAMINATION OF BOB BLACKMAN AND RACHEL STARK - DOCKET UW 170924

NIGEL S. MALDEN LAW, PLLC
711 Court A, Suite 200
Tacoma, Wa. 98402
253-627-0393 *p*
844-273-6067 *f*

1	SH-Exh-X-37	Sarah Hand Exhibit List	Blackman Declaration dated 05-09-2017
2	SH-Exh-X-38	Sarah Hand Exhibit List	Blackman Deposition dated 08-28-2017
3	SH-Exh-X-39	Sarah Hand Exhibit List	UTC Hearing Transcript dated 06-16-2017
4	SH-Exh-X-40	Sarah Hand Exhibit List	2012 Rainier View Annual Water Quality Report for Southwood Water System
5	SH-Exh-X-41	Sarah Hand Exhibit List	2013 Rainier View Annual Water Quality Report for Southwood Water System
6	SH-Exh-X-42	Sarah Hand Exhibit List	2014 Rainier View Annual Water Quality Report for Southwood Water System
7	SH-Exh-X-43	Sarah Hand Exhibit List	2015 Rainier View Annual Water Quality Report for Southwood Water System
8	SH-Exh-X-44	Sarah Hand Exhibit List	2017 Rainier View Annual Water Quality Report for Southwood Water System
9	SH-Exh-X-45	Sarah Hand Exhibit List	City of Olympia Drinking Water Fact Sheet re: Manganese
10	SH-Exh-X-46	Sarah Hand Exhibit List	UTC Open Meeting Memo dated June 16, 2017
11	SH-Exh-X-47	Sarah Hand Exhibit List	UTC Open Meeting Memo dated December 22, 2016
12	SH-Exh-X-48	Sarah Hand Exhibit List	DOH Fact Sheet – color, taste and odor problems in drinking water dated January 2011
13	SH-Exh-X-49	Sarah Hand Exhibit List	DOH Fact Sheet – Color, taste and odor problems in drinking water dated February 2018
14	SH-Exh-X-50	Sarah Hand Exhibit List	1995 MOU between DOH and UTC
15	SH-Exh-X-51	Sarah Hand Exhibit List	2008 MOU between DOH and UTC
16	SH-Exh-X-52	Sarah Hand Exhibit List	Email from State Attorney General’s Office to Bryan Smithson and related Email from Kathryn McPherson to Bryan Smithson denying UTC has jurisdiction over water quality in November 2016.

SARAH HAND’S EXHIBIT LIST FOR CROSS EXAMINATION OF BOB BLACKMAN AND RACHEL STARK – DOCKET UW 170924

NIGEL S. MALDEN LAW, PLLC
711 Court A, Suite 200
Tacoma, Wa. 98402
253-627-0393 p
844-273-6067 f

1	SH-Exh-X-53	Sarah Hand Exhibit List	Photo – Winco bottled water
2	SH-Exh-X-54	Sarah Hand Exhibit List	Mountain Mist Natural Spring Water Webpage
3	SH-Exh-X-55	Sarah Hand Exhibit List	Google Map Aerial Photo – Mountain Mist Bottling Plant, Fir Meadows Well, and Springwood Estates
4	SH-Exh-X-56	Sarah Hand Exhibit List	Email exchange between Rainier View customer, Tina Case, Virpi Salo-Zieman at DOH, and Robert Blackman re: Complaint over water quality
5	SH-Exh-X-57	Sarah Hand Exhibit List	EPA Secondary Drinking Water Standards: Guidance For Nuisance Chemicals

10
11
12
13 Dated this 20th day of July, 2018

14
15 

16
17 _____
18 Nigel S. Malden, WSBA#15643

19 Attorney to Sarah Hand, Complainant
20
21
22
23
24
25
26
27
28

**SARAH HAND'S EXHIBIT LIST FOR CROSS
EXAMINATION OF BOB BLACKMAN AND
RACHEL STARK – DOCKET UW 170924**

NIGEL S. MALDEN LAW, PLLC
711 Court A, Suite 200
Tacoma, Wa. 98402
253-627-0393 *p*
844-273-6067 *f*