

BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION

SARAH HAND AND GRETCHEN HAND,
a married couple

Complainant,

v.

RAINIER VIEW WATER COMPANY, INC.,

Respondent.

DOCKET UW 170924

**SARAH HAND'S EXHIBIT 58 TO
CROSS EXAMINATION**

EXHIBIT 58

TO CROSS EXAMINATION OF BOB BLACKMAN AND RACHEL STARK

July 25, 2018

Sarah Hand's First Request For Production Of Documents
to RVWC with Response dated February 20, 2018

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6 BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION

7 SARAH HAND,

8 Complainant,

9 v.

10 RAINIER VIEW WATER COMPANY, INC.,

11 Respondent.

Docket No. UW 170924

PLAINTIFF'S FIRST REQUEST FOR
PRODUCTION OF DOCUMENTS TO
RAINIER VIEW WATER COMPANY INC.
AND RESPONSES THERETO

13 TO: Sarah Hand, Complainant

14 AND TO: Nigel S. Malden, Attorney for Complainant

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16 **REQUESTS FOR PRODUCTION**

17 **REQUEST FOR PRODUCTION NO. 1:** Produce all water quality test results for all wells in
18 the Southwood System taken from January 1, 2016 to present.

19 **RESPONSE:**

20 Please reference documents bates numbered RVWC.UTC000000-000281.

21
22 **REQUEST FOR PRODUCTION NO. 2:** Produce copies of all complaints from customers on
23 the Southwood System relating to water quality which you received in 2014, 2015, 2016, 2017
24 and 2018.

25 **RESPONSE:**

26 **Objection.** Request for Production No. 2 is vague and susceptible to multiple

27 interpretations in the use of the word "complaints". Aside from the Complainant's
28 **PLAINTIFF'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS TO RAINIER
VIEW WATER COMPANY INC. AND RESPONSES THERETO- 1**

PREG O'DONNELL & GILLETT PLLC

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SEATTLE, WASHINGTON 98164-2026

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1 complaint, previously produced, RVWC received no escalated water quality complaints
2 from customers during this time period. Accordingly, no such documents exist.
3

4 **REQUEST FOR PRODUCTION NO. 3:** Produce all work orders relating to water quality
5 complaint from customer on the Southwood System from 2014 to present.

6 **RESPONSE:**

7 Please see objection and response to Request for Production No. 2. Notwithstanding the
8 foregoing, please reference documents marked RVWC.UTC000282-291 listing all
9 customer-initiated work orders from 1-29-2015 through the present. No documents exist
10 for the timeframe prior to 1-29-2015.

11 **REQUEST FOR PRODUCTION NO. 5:** Produce all written or electronic communications
12 between you and Apex Engineering regarding the design, cost, installation, maintenance, repair
13 and performance of any water filter system installed on any well in the Southwood System in
14 2015, 2016, 2017, or 2018.

15 **RESPONSE:**

16 Please reference documents marked RVWC.UTC000302-321.
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19 **REQUEST FOR PRODUCTION NO. 7:** Produce copies of documents showing Robert
20 Blackman's ownership or financial interest in Rainier view from 2015 to present.

21 **RESPONSE:**

22 **Objection.** Mr. Blackman's ownership interest in Rainier View Water Company, Inc. is
23 not relevant to this litigation and is not reasonably calculated to lead to the discovery of
24 admissible evidence. Without waiving the foregoing objection, Mr. Blackman's financial
25 interest is limited to a fixed value pay-out following retirement.
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1 **REQUEST FOR PRODUCTION NO. 8:** Produce all documents, if any, relating to any
2 survey of Pierce County customers which you conducted pursuant to WAC 246-290-320(3)(d).

3 **RESPONSE:**

4 **No responsive documents exist because RVWC was not required to conduct a survey of**
5 **Pierce County customers pursuant to WAC 246-290-320(3)(d).**

7
8 **REQUEST FOR PRODUCTION NO.9:** Produce all documents relating to any presentation
9 of options or alternative to the filtration system designed and installed by APEX Engineering in
10 2015, 2016, or 2017.

11
12 **RESPONSE:**

13 **No responsive documents exist.**

14
15 DATED this 20 day of February, 2018.

16 PREG O'DONNELL & GILLETT PLLC

17
18 By 

Eric P. Gillett, WSBA #23691

Daniel W. Rankin, WSBA #49673

Attorneys for Defendant Rainier View Water
Company, Inc.

1 **DECLARATION OF SERVICE**

2 The undersigned declares under penalty of perjury under the laws of the State of Washington that
3 on this day the undersigned caused to be served in the manner indicated below a copy of the foregoing
4 document directed to the following individuals:

5 **Counsel for Plaintiff Sarah Hand**

6 Nigel S. Malden, Esq.
7 Nigel S. Malden Law, PLLC
8 711 Court A, Suite 200
Tacoma, WA 98402

- 9 Via Messenger
10 Via Facsimile – (844) 273-6067
11 Via U.S. Mail, postage prepaid
12 Via Overnight Mail, postage prepaid
13 Via Court E-Service or email
with recipient’s approval
nm@nigelmaldenlaw.com

14 DATED in Seattle, Washington, this 20th day of February, 2018.

15 
16 _____
17 Ana I. Todakonzie