

Williams, Kastner & Gibbs PLLC

A NORTHWEST LAW FIRM[®]

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July 7, 2004

74325.0104

Carole J. Washburn
WUTC Executive Secretary
Washington Utilities and Transportation Commission
1300 S. Evergreen Park Drive SW
P.O. Box 47250
Olympia, WA 98504

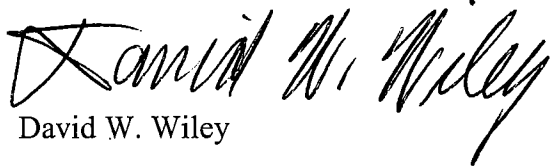
Re: Application No. B-079240, Docket No. TS-021996- Pacific Cruises Northwest, Inc.,
d/b/a Victoria San Juan Cruises

Dear Secretary Washburn:

Pursuant to Prehearing Conference Order No. 01 in the above matter, enclosed for filing, please find an original and eight copies of a letter to Polly L. McNeill counsel for Protestant San Juan Shuttle Express, Inc. regarding informal discovery requests of the Protestant.

Yours truly,

WILLIAMS, KASTNER & GIBBS PLLC


David W. Wiley

DAV:ks

Carole J. Washburn
July 7, 2004
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I hereby certify that on July 7, 2004, I caused to be served an original and eight copies of the forgoing document to the following address via first class mail:

Carole J. Washburn, Secretary
Washington Utilities and Transportation Commission
1300 S. Evergreen Park Dr. S.W.
Olympia, WA 98504-7250

I certify I have also provided an official electronic file containing the foregoing document via email to: records@wutc.wa.gov and an electronic copy via email and first class mail, postage prepaid to:

Polly L. McNeill
Summit Law Group PLLC
315 Fifth Avenue So., Suite 1000
Seattle, WA 98104-2682

Jonathan Thompson
Assistant Attorney General
1400 S. Evergreen Park Drive SW
P.O. Box 40128
Olympia, WA 98504-0128

Administrative Law Judge Karen M. Caillé
Washington Utilities and Transportation
Commission
Chandler Plaza Building
1300 S. Evergreen Park Drive SW
P.O. Box 47250
Olympia, WA 98504-7250

July 7, 2004

74325.0104

Polly McNeill
Summit Law Group
315 Fifth Avenue S., #1000
Seattle, WA 98104-2682

Re: Docket No. TS-031996, In re Application No. B-079240 of Pacific Cruises Northwest, Inc. d/b/a Victoria San Juan Cruises

Dear Ms. McNeill:

Per the Prehearing Conference Order No. 1 in this matter, below is an informal list of document production requests and interrogatories we would seek to have provided and/or answered by the protestant ("SJISE") in this matter:

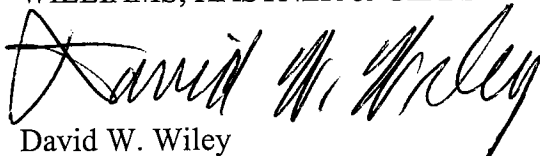
1. Please provide copies of any and all judgments against San Juan Island Shuttle Express, Inc. and/or Mark and Margaret Goodman filed in the courts in the State of Washington from the years 2001 to present, including the judgment obtained by Wells Fargo Bank.
2. Please provide proof of satisfaction of the debt between San Juan Island Shuttle Express, Inc. and Port of Bellingham pursuant to the termination of Rental Agreement for Warehouse No. 4 as of April 30, 2003 for non-payment of lease.
3. Please provide proof of satisfaction of the debt between San Juan Island Shuttle Express, Inc. and Port of Bellingham pursuant to the "PAY RENT OR VACATE" notice for the months of December, 2002 and January through March, 2003 in connection with the Lease and Transportation Operating Agreement.
4. Please provide federal income tax returns for San Juan Island Shuttle Express, Inc. for the years 2000, 2001, 2002 and 2003.
5. Please provide all documents received or recorded regarding the Washington State Department of Revenue judgment against San Juan Island Shuttle Express, Inc. and/or Mark and Margaret Goodman in 2003, 2004.
6. Please provide all correspondence regarding the Port of Friday Harbor slip/moorage agreement cancellation with SJISE and/or Mark and Margaret Goodman, due to delinquencies incurred under the San Juan Island Shuttle Express, Inc. lease and provide evidence of satisfaction of the debt owed the Port.

7. Please provide information on cessation of the "Red Head" lease and whether any deficiencies exist or existed on the financial performance by SJISE under the lease.
8. In April 2004, Mark Goodman and/or SJISE for the third consecutive year asked the WUTC to allow it to suspend regulated service to Friday Harbor. In this request, SJISE referenced its analysis or evaluation of operating profits on the last year of operating the route, and indicated that it purportedly showed insufficient income/profit to sustain the route. Please provide copies of any such financial analyses, proformas and/or actual costs/profitability studies of the route supporting to this representation to the Commission in April, 2004.
9. Has SJISE and/or Mark and Margaret Goodman filed bankruptcy in the years 2002-2004? If so, please provide court and docket numbers.
10. Does Mark Goodman and/or San Juan Island Shuttle Express, Inc. currently own or lease a commercial ferry passenger-type vessel? If so, what is its name, and please provide a USCG Certificate of Inspection?
11. Is Mark Goodman employed at present? If so, by whom and would his present employment obligations this season preclude him from operating San Juan Island Shuttle Express, Inc. in service between Bellingham and Friday Harbor? If not, what vessel would he be operating and where would he propose to moor the vessel in Friday Harbor and Bellingham?

Please advise as to an anticipated response dates and note that we reserve the right to request additional documents or interrogatories after reviewing responsive documents and/or answers.

Yours truly,

WILLIAMS, KASTNER & GIBBS PLLC



David W. Wiley

DAV:ks

cc: Drew Schmidt
Karen M. Caille, Administrative Law Judge
Jonathan Thompson
Carole Washburn