

# HCMC

HILLIS  
CLARK  
MARTIN &  
PETERSON  
*law offices*

September 2, 2005

Ms. Carole J. Washburn, Executive Secretary  
Washington Utilities and  
Transportation Commission  
1300 South Evergreen Park Drive S.W.  
P.O. Box 47250  
Olympia, WA 98504-7250

*Via U.S. Mail and Electronic Mail*

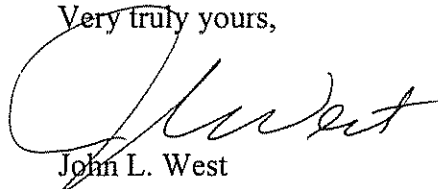
Re: *Washington Utilities and Transportation Commission vs. Inland  
Telephone Company, Docket No. UT-050606*

Dear Ms. Washburn:

Enclosed with respect to the above-referenced matter are six copies of Suncadia, LLC's Motion to Exclude Certain Experts from Access to Confidential Information.

If you have any questions concerning this filing, please contact the undersigned.

Very truly yours,



John L. West

*E-Mail:* [rmp@hcmp.com](mailto:rmp@hcmp.com)

cc: Suncadia, LLC  
Richard Finnigan  
Chris Swanson  
Gregory J. Kopta  
Robert Cromwell  
Richard M. Peterson

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BEFORE THE WASHINGTON UTILITIES  
AND TRANSPORTATION COMMISSION

WASHINGTON UTILITIES AND  
TRANSPORTATION COMMISSION,

Docket No. UT-050606

Complainant,

vs.

**SUNCADIA, LLC'S  
MOTION TO EXCLUDE  
CERTAIN EXPERTS FROM  
ACCESS TO CONFIDENTIAL  
INFORMATION**

INLAND TELEPHONE COMPANY,

Respondent.

Pursuant to Washington Administrative Code Section 480-07-420 and 480-07-423,  
and the Protective Order in this Docket, Suncadia, LLC ("Suncadia") hereby moves the  
Washington Utilities and Transportation Commission ("WUTC") to exclude certain experts  
from access to Confidential Information in the above-captioned proceeding. In support of this  
Motion, Suncadia states as follows:

1. The following persons should be excluded from access to Confidential  
Information furnished by Suncadia:

- (a) Gregory A. Maras
- (b) James K. Brooks
- (c) John P. Coonan


1 2. Suncadia requests an order excluding the certain experts named above from  
2 access to Confidential Information furnished by Suncadia, based on the facts contained in the  
3 Exhibits B such experts filed in this Docket, that they are each employees of Inland  
4 Telephone Company.

5 3. Suncadia has not waived the restriction contained in Section 8 of the Protective  
6 Order that “[n]o such expert may be an officer, director, direct employee . . . of any party . . .  
7 (unless this restriction is waived by the party asserting confidentiality).”

8 4. Based on the foregoing, Suncadia requests an order excluding the experts  
9 named above from access to Confidential Information furnished by Suncadia.

10 DATED this 2<sup>nd</sup> day of September 2005.

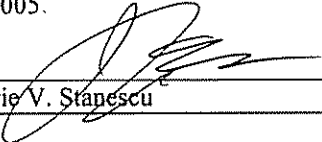
11 HILLIS CLARK MARTIN &  
12 PETERSON, P.S.

13  
14 By   
15 John L. West, WSBA #2318  
16 [jlw@hcmp.com](mailto:jlw@hcmp.com)  
17 Attorneys for Suncadia, LLC

18 **CERTIFICATE OF SERVICE**

19 I hereby certify that I have this day served this  
20 document upon all parties of record in this proceeding, by  
21 U.S. mail and electronic mail.

22 DATED at Seattle, Washington, this 2<sup>nd</sup> day of  
23 September, 2005.

24   
25 Marie V. Stanesco

26 #311014 17279-014 6nz@011 doc 9/02/05