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6 **BEFORE THE WASHINGTON STATE**  
7 **UTILITIES AND TRANSPORTATION COMMISSION**  
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9 WASHINGTON UTILITIES AND  
10 TRANSPORTATION COMMISSION,

11 Complainant,

12 v.

13 INLAND TELEPHONE COMPANY,

14 Respondent.  
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DOCKET NO. UT-050606

RESPONSE TO SUNCADIA, LLC'S MOTION  
TO EXCLUDE CERTAIN EXPERTS FROM  
ACCESS TO CONFIDENTIAL INFORMATION  
**AND REQUEST FOR EXPEDITED RULING**

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17 1. Inland Telephone Company ("Inland") is filing this Response to the Motion of Suncadia,  
18 LLC ("Suncadia") to Exclude Certain Experts from Access to Confidential Information (the  
19 "Motion"). The Motion seeks to exclude Gregory A. Maras, James K. Brooks and John P. Coonan  
20 from access to confidential information on the basis that they are employees of Inland. The only  
21 basis for the Motion included in Suncadia's Motion is a statement that Suncadia has not waived the  
22 restrictions contained in Section 8 of the Protective Order.

23 2. Inland needs Messrs. Maras, Brooks and Coonan to have the ability to review confidential  
24 information. The three individuals were chosen with forethought to address the needs of Inland in  
25 this proceeding.

26 RESPONSE TO SUNCADIA, LLC'S MOTION  
TO EXCLUDE CERTAIN EXPERTS - 1

Law Office of  
Richard A. Finnigan  
2112 Black Lake Blvd. SW  
Olympia, WA 98512  
(360) 956-7001

1 3. Mr. Coonan is to be the witness appearing in this matter on behalf of Inland. Mr. Coonan  
2 needs access to confidential information in order to prepare his testimony.


3 4. Mr. Maras was chosen to have access to confidential information because he is an expert in  
4 the provisioning of telecommunications services and would be able to review such information to  
5 provide input to Mr. Coonan in the development of Mr. Coonan's testimony and to assist counsel in  
6 the preparation of cross-examination questions and perhaps further discovery.

7 5. Mr. Brooks is an expert in financial matters, particularly as they relate to  
8 telecommunications, and would review any confidential financial information to be able to assist  
9 Mr. Coonan in the development of Mr. Coonan's testimony and to assist counsel in the preparation  
10 of cross-examination and perhaps additional discovery.

11 6. Inland has not asked that every employee have access to confidential information. Inland  
12 has only placed those employees that are needed for the preparation of testimony in this docket and  
13 to assist counsel in this docket on the list of those who would review confidential information. For  
14 example, Inland has not requested that Mr. Nathan Weis and Mr. Doug Weis, both of whom are  
15 officers and shareholders of Inland, have access to confidential information. Inland's review of  
16 confidential information is directly related to its needs to prepare testimony in this docket.

17 7. Inland respectfully requests an expedited ruling on the Motion. While testimony in this  
18 matter is not scheduled to be due until October 21, 2005, because of the schedule of counsel for  
19 Inland, Inland will need to have its testimony in near final form by September 28, 2005.

20 Respectfully submitted this 6th day of September, 2005.

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RICHARD A. FINNIGAN, WSB #6443  
Attorney for Inland Telephone Company