

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

SHUTTLE EXPRESS, INC.,

Petitioner and Complainant,

v.

SPEEDI SHUTTLE WASHINGTON, LLC

Respondent.

DOCKET NOS.

TC-143691

TC-160516

TC-161257

DECLARATION OF

BROOKS E. HARLOW

1 My name is Brooks E. Harlow. I am a principal in the law firm of Lukas, LaFuria, Gutierrez & Sachs, LLP. My business address is 8300 Greensboro Drive, Suite 1200, Tysons, Virginia 22102.

2 On or about December 27, 2016, Respondent's counsel produced over 200 pages of documents pursuant to Judge Pearson's rulings on Petitioner's Data Request Nos. 2 and 12, which had originally been served in August of 2016. Attached as Exhibit A are a true and correct copy of Bates No. pages SS 0884 to SS 0890 from that partial document production.

3 The documents produced on December 27, 2016 were in a word-searchable Adobe format. I searched for the words "foreign," "English," "Chinese," "Japanese," and "Korean" in the entire document production of that date. Not one of those words was found to exist in the documents produced.

I declare under penalty of perjury under the laws of the Commonwealth of Virginia that the statements in this declaration are true and correct to the best of my knowledge, information, and belief.

Executed at Tysons, Virginia this 10th day of January, 2017.



EXHIBIT A

From: Henao, Marcela <marcela.henao@gta-travel.com>
Sent time: 04/23/2015 04:24:26 PM
To: Lee Collins
Cc: Lorraine Silva-Hausman
Subject: Re: New SpeediShuttle Seattle Services - GTA
Attachments: image001.jpg image002.jpg

This would actually be the better option. I thought of the same once I reviewed the bookings in place after we hung up.

I have already loaded the product, however it remains off the web. I will simply make the product live as of now for bookings with travel dates starting May 1st.

The existing bookings I will leave with Shuttle Express. I am sure once I send the advert announcing New Low Rates for Shared Transfer available now in Seattle, clients will cancel and rebook with Speedishuttle. But at least it will be their choice and there will be no bad blood.

To future success and more booking!

Regards,

Thanks and Regards,

Marcela Henao

Destination Services Market Manager

GTA

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[New York, NY 10001, USA](#)

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<mailto:marcela.henao@gta-travel.com>

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On Apr 23, 2015, at 6:14 PM, Lee Collins <leeCollins@speedishuttle.com> wrote:

Aloha Marcela,

Would it be possible to launch the new account for Seattle and send the new bookings coming in for after May 1 to us instead of transferring all the existing bookings?

Thanks,

Lee

From: Henao, Marcela [<mailto:marcela.henao@gta-travel.com>]

Sent: Thursday, April 23, 2015 6:01 AM

To: Lee Collins

Subject: RE: New SpeediShuttle Seattle Services - GTA

SS 0884

Hi Lee –

Well thank you.

I will hold off until you advise we can move forth with the account and switching the bookings that are already in place.

Thanks and Regards

Marcela Henao
Destination Services Market Manager

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From: Lee Collins [<mailto:leeCollins@speedishuttle.com>]
Sent: Wednesday, April 22, 2015 11:49 PM
To: Henao, Marcela
Subject: RE: New SpeediShuttle Seattle Services - GTA

Aloha Marcela,

Thank you for the Seattle agreement.

We will forward it to the WUTC in the morning for their review. Please do not start selling until we get the approval from the WUTC as they can take up to 30 days and we cannot service your guests until we have permission from them. Jack is working closely with them so we will let you know the moment your agreement is approved.

Thanks again for all your wonderful support, we are very excited about serving your guests in Seattle.

Warmest Regards,

SS 0885

<image001.jpg>

Lee Collins

Vice President of Sales & Marketing

SpeediShuttle, LLC and Arthur's Limousine

1132 Bishop Street Suite 2312, Honolulu, HI 96813

Tel: 808-772-5700 x102 | Fax: 808-772-5699 | Cell: 808-375-3910

www.speedishuttle.com | www.arthurslimousinehawaii.com | LeeCollins@speedishuttle.com

Hawaii's premier statewide airport shuttle service, operating on Oahu, Maui, Big Island and Kauai

<image002.jpg>

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From: Henao, Marcela [<mailto:marcela.henao@qta-travel.com>]
Sent: Wednesday, April 22, 2015 12:23 PM
To: Lee Collins
Subject: RE: New SpeediShuttle Seattle Services - GTA

Hi Lee –

It's been a ride since I have been back in the office, excuse my delay with this process. Trying to figure out what I will do with the booking already in place. I will just transfer over all bookings to Speedishuttle.

I have attached the document necessary to get our account set up.

I will draw up a list of the bookings already in place and should have this over to you by tomorrow.

SS 0886

Let me know what else you might need.

Thanks and Regards,

Marcela Henao
Destination Services Market Manager

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New York, NY 10001, USA

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From: Lee Collins [<mailto:leeCollins@speedishuttle.com>]
Sent: Monday, March 23, 2015 1:42 PM
To: Henao, Marcela
Subject: RE: New SpeediShuttle Seattle Services - GTA

Aloha Marcela,

Hope you had a great weekend.

We are really getting excited. The service is going to be exceptional in Seattle with all Mercedes Benz Fleet, Captain's Chairs, Free Wi-Fi, video monitors and exceptional low pricing.

Any word on getting back the agreements so we can get your account set up?

Warmest Regards,

<image001.jpg>

Lee Collins

Vice President of Sales & Marketing

SS 0887

SpeediShuttle, LLC and Arthur's Limousine

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From: Henao, Marcela [<mailto:marcela.henao@qta-travel.com>]
Sent: Friday, February 20, 2015 10:30 AM
To: Lee Collins
Subject: RE: New SpeediShuttle Seattle Services - GTA

This is great news!

I will review the details and return response once paperwork is complete.

Best,

Marcela Henao
Destination Services Market Manager

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From: Lee Collins [<mailto:leeCollins@speedishuttle.com>]
Sent: Thursday, February 19, 2015 5:53 PM
To: Henao, Marcela
Subject: New SpeediShuttle Seattle Services - GTA
Importance: High

Aloha Marcela,

SpeediShuttle Seattle is on schedule to begin offering services in King County Seattle Washington May 1, 2015. Our new services will be designed to provide an extraordinary experience at a very affordable price for tourists, business and resident travelers. This is your first opportunity in decades to choose another company's services since only one company has been permitted to operate in the entire King county service area for thirty years.

I have attached an information kit along with the agreements for your consideration. If you have any questions please contact me anytime.

We are very excited about expanding our services from Hawaii to the mainland and our team would be honored to serve you and your guests traveling in the Seattle area.

Hope to see you at Pow Wow this year.

Warmest Regards,

<image001.jpg>

Lee Collins

Vice President of Sales & Marketing

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