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STATE OF WASH.
UTIL. AND TRANSP.
COMMISSION

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

SANDRA JUDD, et al.,

Complainants,

v.

AT&T COMMUNICATIONS OF THE
PACIFIC NORTHWEST, INC.; and
T-NETIX, INC.,

Respondents.

DOCKET NO. UT-042022

**DECLARATION OF JONATHAN P. MEIER
IN SUPPORT OF COMPLAINANTS' SECOND MOTION FOR CONTINUANCE OF
RESPONSE DEADLINE TO AT&T'S MOTION FOR SUMMARY DETERMINATION**

Jonathan P. Meier declares, under penalty of perjury and in accordance with the laws of the state of Washington, that:

1. I am one of the attorneys representing the complainants Sandra Judd and Tara Herivel in this matter. The facts stated in this declaration are based upon my personal knowledge.

2. I spoke with Stephanie Joyce, who represents T-Netix in this proceeding, on January 24, 2005. She indicated that T-Netix does not oppose a request for continuance, whether the new deadline is set at the prehearing conference or whether it is set for May 6, 2005. With respect to complainants' request to take discovery from

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T-Netix, she indicated that T-Netix prefers to discuss any discovery issues involving it at the February 16, 2005 prehearing conference.

3. I spoke with Chip Peters, who represents AT&T in this proceeding, on January 21, 2005. He indicated that AT&T did not have a problem with the concept of a continuance, but we did not agree to a specific date or method for setting a new response deadline. My attempts to reach Mr. Peters on January 24 were unsuccessful.

4. To date, the following discovery has occurred: On January 14, complainants produced documents in their possession relating to the inmate telephone services provided to them. On January 17, AT&T produced certain contract documents. These documents largely duplicate the contract documents attached to AT&T's motion for summary determination, although certain documents that were attached to the motion are missing in AT&T's first production. Moreover, AT&T has produced no emails, memos, or other similar documents that were not attached to its motion.

5. AT&T has not produced any documents relating to the issue of "where telecommunications traffic from the correctional facilities at issue in this proceeding connect to AT&T's point of presence." Counsel for AT&T has explained that certain documents are confidential and will not be produced without a protective order. Counsel for AT&T has also stated that it will provide complainants' counsel with a draft protective order, but this has not occurred yet.

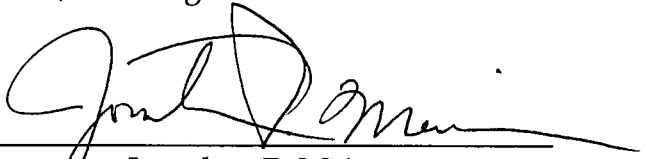
6. AT&T has not identified particular persons to be deposed, other than Frances Gutierrez. In any event, depositions cannot take place before documents are produced.

7. Attached as Exhibit A is a true and correct copy of AT&T's Supplemental Memorandum in Support of Motion to Dismiss, filed in this action in King County Superior Court on October 27, 2000.

8. Attached as Exhibit B is a true and correct copy of T-Netix's Motion for Dismissal of First Amended Complaint - Class Action, filed in this action in King County Superior Court on August 25, 2000.

9. Attached as Exhibit C is a true and correct copy of T-Netix's Response to Plaintiffs' Supplemental Memorandum, filed in this action in King County Superior Court on October 27, 2000.

Signed this 24th day of January 2005, at Seattle, Washington.



Jonathan P. Meier

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CERTIFICATE OF SERVICE

I certify, under penalty of perjury and in accordance with the laws of the State of Washington, that on January 24, 2005, I served a copy of the foregoing document on all counsel of record in the manner shown and at the addresses listed below:

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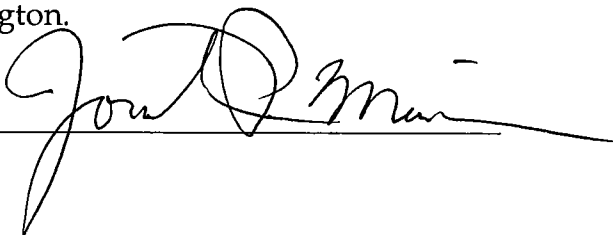
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DATED: January 24, 2005, at Seattle, Washington.



Jonathan D. Manishin