DATE PREPARED: April 3, 2017 DOCKET: TC-143691, TC-160516 REQUESTER: Shuttle Express, Inc. WITNESS: RESPONDER: TELEPHONE:

Jack Roemer Jack Roemer (206) 233-2895

## Data Request No. 69:

Regarding Mr. Roemer's testimony at page 23 on the 42 multilingual employee among all its employees in Washington, please identify, as of February 1, 2016, each of SpeediShuttle's employees in Washington and, for each person, state their job title or function and identify any languages that each of them speaks other than English.

## **RESPONSE to Data Request No. 69:**

This request is intended to harass Speedishuttle by requesting information it has already produced. This request is unreasonably cumulative of Shuttle Express' Data Request No. 1 which sought the same information and which was provided as of September 9, 2016. Attempting to reconstruct information for a particular date, particularly so with respect to a date of no particular significance, is unduly burdensome. This request appears to be nothing more than an attempt to harass Speedishuttle and seek to add to the amount of time and expense required to respond to discovery in this proceeding.

SPEEDISHUTTLE'S RESPONSES TO SHUTTLE EXPRESS' THIRD DATA REQUESTS - 36

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