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June 18, 2002

VIA HAND DELIVERY

The Honorable Vernon A. Williams
Secretary
Surface Transportation Board
1925 K Street, NW
Room 704
Washington, D.C. 20423

ENTERED
Office of the Secretary

JUN 18 2002

Part of
Public Record

RE: DHX, Inc. v. Matson Navigation, et al.
STB Docket No. WCC-105
Sea-Land Response to DHX's Motion to Compel Discovery
Sea-Land Response to DHX's Motion for Waiver of Rule

Dear Secretary Williams:

Please accept this original letter and the enclosed eleven copies for entry in the record in the above captioned proceeding as a response by SL Service, Inc. ("SL") to DHX's Motion to Compel Discovery and DHX's Motion for Waiver of Rule in the above-referenced matter.

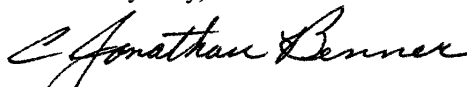
SL has no objection to DHX's Motion for Waiver of Rule. However, SL does oppose DHX's Motion to Compel Discovery. SL had responded to a large number of DHX's discovery requests and was attempting to work with DHX's counsel on all discovery issues when DHX abruptly filed its Motions. By any measure, SL's responses to DHX's expansive discovery had far exceeded any reciprocal production from DHX in response to discovery requests promulgated by SL. Our sense of DHX's filing was that it was totally inappropriate given the state of production and the seemingly cooperative environment of discussions. In any event, SL notes that as a result of the Board's June 6, 2002 decision, the DHX Motions are moot. Had the Board's ruling of 6 June not intervened, this opposition would be far more strenuous and formal. SL continues to address discovery issues pending a Board ruling on SL's Motion to Dismiss so that discovery can be completed promptly after the Board's ruling.

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Page 2

Please acknowledge receipt and filing of this letter by stamping the eleventh copy of this letter, which is enclosed for that purpose, and returning it to the individual making this filing for return to me.

Yours very truly,



C. Jonathan Benner

cc: Parties of Record