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The Honorable Ronald B. Leighton

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE**

DANIEL MITCHELL, et al.,

Plaintiffs,

v.

CHARLES ATKINS, in his official
capacity as the Sheriff of Clark County, et
al.,

Defendants.

NO. 3:19-cv-5106

DECLARATION OF
ZACHARY P. JONES IN
SUPPORT OF MOTION FOR
PROTECTIVE ORDER

1. I am an Assistant Attorney General in the Complex Litigation Division of the Office of the Attorney General. In that capacity, I am one of the attorneys representing the Department of Licensing in the above-captioned case. I am at least 18 years of age, competent to testify as a witness, and have personal knowledge of the facts related in this declaration.

2. Attached as Exhibit A is a true and correct copy of the first Notice of Deposition of Rule 30(b)(6) Representative of Teresa Berntsen, dated and served by Plaintiffs’ counsel by email on September 27, 2019. The deposition was noticed for “November 8, 2018.” In a subsequent email, Plaintiffs’ counsel Joel Ard stated that the 2018 date was an error, and that the intended deposition date was November 8, 2019. Neither I nor my co-counsel had had any prior communication with Plaintiffs’ counsel regarding deposition scheduling in this matter,

1 let alone a specific communication regarding Director Berntsen's (or a representative's)
2 availability on November 8, 2019.

3 3. Attached as Exhibit B is a true and correct copy of an email I received from
4 Plaintiffs' counsel Joel Ard on October 9, 2019, which attached two documents: a
5 "superseding" Rule 30(b)(6) deposition notice and a subpoena duces tecum, which are attached
6 hereto as exhibits C and D, respectively (see below).

7 4. Attached as Exhibit C is the superseding Notice of Deposition of Rule 30(b)(6)
8 Representative of Defendant Teresa Berntsen (the Notice), dated and served by Plaintiffs'
9 counsel by email on October 9, 2019. As revised, the deposition was noticed for November 12,
10 2018.

11 5. Attached as Exhibit D is a true and correct copy of the Subpoena for the
12 Production of Documents issued to Defendant Teresa Berntsen, dated and served by Plaintiffs'
13 counsel by email on October 9, 2019.

14 6. On October 23, 2019, I met and conferred by telephone with Plaintiffs'
15 attorneys Mr. Ard and David DeWolf regarding the objections to the Notice that are the basis
16 for this motion. I requested that Plaintiffs withdraw or revise the deposition notice. On
17 October 24, 2019, Mr. Ard informed me by email that he did not agree with my objections and
18 declined to withdraw the deposition notice.

19 7. I declare under penalty of perjury under the laws of the State of Washington
20 that the foregoing is true and correct.

21 DATED this 24th day of October 2019.

22
23 /s/ Zachary P. Jones
24 ZACHARY P. JONES

Exhibit A

1
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3
4
5 UNITED STATES DISTRICT COURT
6 FOR THE WESTERN DISTRICT OF WASHINGTON
AT TACOMA

7 DANIEL MITCHELL, ROBIN BALL, LUKE
8 RETTMER, ARMEN TOOLOEE,
9 NATHANIEL CASEY, MATTHEW WALD,
SECOND AMENDMENT FOUNDATION,
AND NATIONAL RIFLE ASSOCIATION,

No. 3:19-cv-05106-RBL

10 Plaintiffs,

NOTICE OF DEPOSITION OF FED. R.
CIV. P. 30(B)(6) REPRESENTATIVE OF
TERESA BERNTSEN

11 v.

12 CHUCK ATKINS, in his official capacity as the
13 Sheriff of Clark County, Washington, CRAIG
14 MEIDL, in his official capacity as the Chief of
Police of Spokane, Washington, and TERESA
15 BERNTSEN, in her official capacity as the
Director of the Washington State Department
of Licensing,

16 Defendants.

17
18 TO: Teresa Berntsen, in her official capacity as the Director of the Washington State
19 Department of Licensing.

20 Please take notice that the deposition of Defendant Teresa Berntsen, through her
21 designated representative, will be taken on oral examination before a notary public or some
22 other official authorized by law to administer oaths, at a location to be determined by mutual
23 consent, commencing at 9:00 a.m. on November 8, 2018. This oral examination will be subject
24 to continuance or adjournment from time to time or place to place until completed.
25
26

1 Teresa Berntsen must designate one or more persons who consent to testify on her
2 behalf. In accordance with FRCP 30(b)(6), she shall designate persons with knowledge of the
3 following subjects:

4 1. A response to one or more of Mitchell's Requests for Admission served September
5 27, 2019 that is anything other than an unqualified admission.

6 Please designate individual representatives in writing at least one week in advance of
7 the deposition. The representative(s) will give testimony and remain in attendance until
8 discharged, to be deposed in this lawsuit. The deposition shall be recorded by video, audio and
9 stenographic means.

10
11 September 27, 2019.

12 ARD LAW GROUP PLLC

13 By:  _____

14 Joel B. Ard, WSBA # 40104

15 Ard Law Group PLLC

16 P.O. Box 11633

17 Bainbridge Island, WA 98110

18 (206) 701-9243

19 Attorneys for Plaintiffs

20 ALBRECHT LAW PLLC

21 By:  _____

22 Matthew C. Albrecht, WSBA #36801

23 David K. DeWolf, WSBA #10875

24 421 W. Riverside Ave., Ste. 614

25 Spokane, WA 99201

26 (509) 495-1246

Attorneys for Plaintiffs


CERTIFICATE OF SERVICE

I certify under penalty of perjury under the laws of the United States of America that on September 27, 2019, I served the foregoing Notice of Deposition by email as follows:

<p>Office of the Attorney General PO Box 40100 Olympia, WA 98504-0100 Jeff Even jeffe@atg.wa.gov Dionne M. Padilla-Huddleston DionneP@atg.wa.gov Zach P. Jones ZachJ@atg.wa.gov Judy Simpson RJudyS@atg.wa.gov</p>	<p>Salvatore J Faggiano City Of Spokane 808 W Spokane Falls Blvd Room 550 Spokane, Wa 99201-3326 509-625-6225 sfaggiano@spokanecity.org</p>
<p>Leslie Anne Lopez Pamela Hamilton Clark County Prosecuting Attorney's Office Civil Division PO Box 5000 Vancouver, WA 98665 360-397-2478 leslie.lopez@clark.wa.gov Pamela.Hamilton@clark.wa.gov</p>	<p>Nicholas W. Brown Paul J. Lawrence Sarah S Washburn Gregory J. Wong Kai A. Smith Pacifica Law Group LLP 1191 Second Ave. Ste. 2000 Seattle, WA 98101-3404 nicholas.brown@pacificalawgroup.com paul.lawrence@pacificalawgroup.com sarah.washburn@pacificalawgroup.com greg.wong@pacificalawgroup.com kai.smith@pacificalawgroup.com dawn.taylor@pacificalawgroup.com cindy.bourne@pacificalawgroup.com sydney.henderson@pacificalawgroup.com tricia.okonek@pacificalawgroup.com <i>Attorneys for Intervenor Defendant, Safe Schools Safe Communities</i></p>

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ARD LAW GROUP PLLC

By  _____

Joel B. Ard, WSBA # 40104
Ard Law Group PLLC
P.O. Box 11633
Bainbridge Island, WA 98110
(206) 701-9243
Joel@Ard.law

Attorneys for Plaintiffs

Exhibit B

From: [Joel Ard](#)
To: [Hamilton, Pamela](#); ["Kai.Smith@pacificalawgroup.com"](#); ["sfaggiano@spokanecity.org"](#); [Padilla-Huddleston, Dionne \(ATG\)](#); [ATG MI LAJ Sea FE](#); [Even, Jeffrey T \(ATG\)](#); [Purcell, Noah Guzzo \(ATG\)](#); [Simpson, July \(ATG\)](#); [Jones, Zach P \(ATG\)](#); ["Nicholas.Brown@pacificalawgroup.com"](#); ["paul.lawrence@pacificalawgroup.com"](#); ["Sarah.Washburn@pacificalawgroup.com"](#); ["greg.wong@pacificalawgroup.com"](#); ["sydney.henderson@pacificalawgroup.com"](#); ["tricia.okonek@pacificalawgroup.com"](#); [ATG MI SGO Oly FE](#); [Jensen, Kristin D. \(ATG\)](#); ["Dawn.Taylor@pacificalawgroup.com"](#); [Buswell, Jessica D. \(ATG\)](#); [Beck-Thorne, Nicole K \(ATG\)](#); ["dstragier@spokanecity.org"](#); ["tstrothman@spokanecity.org"](#); ["Cindy.Bourne@pacificalawgroup.com"](#); [ATG MI COM CFC](#); ["Lopez, Leslie"](#)
Cc: [David DeWolf](#); [Matt Albrecht](#); [Melanie Evans](#)
Subject: RE: Mitchell v. Atkins: Requests for Admissions and 30(b)(6) Notices
Date: Wednesday, October 9, 2019 2:56:35 PM
Attachments: [20191009 Mitchell 30\(b\)\(6\) on Berntsen.pdf](#)
[20191009 Mitchell SDT on Berntsen.pdf](#)

Counsel,

Please see the attached revised 30(b)(6) notice to Director Berntsen, superseding the notice of 9/27. There is also a subpoena attached. I intend to reach out about rescheduling the remaining depositions but I understand Ms. Lopez is out of the office until Monday. I will therefore begin that conversation early next week.

Yours,

Joel Ard

Joel B. Ard | Attorney | 206.701.9243 | www.ard.law

This message may contain privileged or confidential information. If you received this transmission in error, please notify the sender by reply e-mail and delete the message and any attachments.

From: Joel Ard
Sent: Friday, September 27, 2019 06:53
To: [Hamilton, Pamela <Pamela.Hamilton@clark.wa.gov>](#); ['Kai.Smith@pacificalawgroup.com' <Kai.Smith@pacificalawgroup.com>](#); ['sfaggiano@spokanecity.org' <sfaggiano@spokanecity.org>](#); ['dionnep@atg.wa.gov' <dionnep@atg.wa.gov>](#); ['lalseaef@atg.wa.gov' <lalseaef@atg.wa.gov>](#); ['jeffe@atg.wa.gov' <jeffe@atg.wa.gov>](#); ['noahp@atg.wa.gov' <noahp@atg.wa.gov>](#); ['rjulys@atg.wa.gov' <rjulys@atg.wa.gov>](#); ['zachj@atg.wa.gov' <zachj@atg.wa.gov>](#); ['Nicholas.Brown@pacificalawgroup.com' <Nicholas.Brown@pacificalawgroup.com>](#); ['paul.lawrence@pacificalawgroup.com' <paul.lawrence@pacificalawgroup.com>](#); ['Sarah.Washburn@pacificalawgroup.com' <Sarah.Washburn@pacificalawgroup.com>](#); ['greg.wong@pacificalawgroup.com' <greg.wong@pacificalawgroup.com>](#); ['sydney.henderson@pacificalawgroup.com' <sydney.henderson@pacificalawgroup.com>](#); ['tricia.okonek@pacificalawgroup.com' <tricia.okonek@pacificalawgroup.com>](#); ['sgoolyef@atg.wa.gov' <sgoolyef@atg.wa.gov>](#); ['kristinj@atg.wa.gov' <kristinj@atg.wa.gov>](#);

'Dawn.Taylor@pacificalawgroup.com' <Dawn.Taylor@pacificalawgroup.com>;
'jessicab5@atg.wa.gov' <jessicab5@atg.wa.gov>; 'nicoleb3@atg.wa.gov' <nicoleb3@atg.wa.gov>;
'dstragier@spokanecity.org' <dstragier@spokanecity.org>; 'tstrothman@spokanecity.org'
<tstrothman@spokanecity.org>; 'Cindy.Bourne@pacificalawgroup.com'
<Cindy.Bourne@pacificalawgroup.com>; 'comcec@atg.wa.gov' <comcec@atg.wa.gov>; 'Lopez,
Leslie' <Leslie.Lopez@clark.wa.gov>

Cc: David DeWolf <david@albrechtlawfirm.com>; Matt Albrecht <matt@albrechtlawfirm.com>;
Melanie Evans <melanie@albrechtlawfirm.com>

Subject: Mitchell v. Atkins: Requests for Admissions and 30(b)(6) Notices

Counsel,

Please see the attached RFAs on each defendant and the intervenor and 30(b)
(6) notices. I look forward to coordinating convenient locations for the noted
depositions.

Yours,

Joel Ard

Joel B. Ard | Attorney | 206.701.9243 | www.ard.law
joel@ard.law

Ard Law Group PLLC | PO Box 11633 | Bainbridge Island, WA 98110

This message may contain privileged or confidential information. If you received this transmission
in error, please notify the sender by reply e-mail and delete the message and any attachments.

Exhibit C

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5 UNITED STATES DISTRICT COURT
6 FOR THE WESTERN DISTRICT OF WASHINGTON
AT TACOMA

7 DANIEL MITCHELL, ROBIN BALL, LUKE
8 RETTMER, ARMEN TOOLOEE,
9 NATHANIEL CASEY, MATTHEW WALD,
SECOND AMENDMENT FOUNDATION,
AND NATIONAL RIFLE ASSOCIATION,

No. 3:19-cv-05106-RBL

10 Plaintiffs,

NOTICE OF DEPOSITION OF FED. R.
CIV. P. 30(B)(6) REPRESENTATIVE OF
TERESA BERNTSEN

11 v.

12 CHUCK ATKINS, in his official capacity as the
13 Sheriff of Clark County, Washington, CRAIG
14 MEIDL, in his official capacity as the Chief of
Police of Spokane, Washington, and TERESA
15 BERNTSEN, in her official capacity as the
Director of the Washington State Department
of Licensing,

16 Defendants.

17
18 TO: Teresa Berntsen, in her official capacity as the Director of the Washington State
19 Department of Licensing.

20 Please take notice that the deposition of Defendant Teresa Berntsen, through her
21 designated representative, will be taken on oral examination before a notary public or some
22 other official authorized by law to administer oaths, at 111 21st Avenue SW, Olympia, WA
23 98501, commencing at 9:00 a.m. on November 12, 2018. This oral examination will be subject
24 to continuance or adjournment from time to time or place to place until completed.

25 **I. DEFINITIONS**

26 1. The term "SAR" has the meaning of RCW 9.41.010(26).

1 Please designate individual representatives in writing at least one week in advance of
2 the deposition. The representative(s) will give testimony and remain in attendance until
3 discharged, to be deposed in this lawsuit. The deposition shall be recorded by video, audio and
4 stenographic means.

5
6 October 9, 2019.

7 ARD LAW GROUP PLLC

8 By: 

9 Joel B. Ard, WSBA # 40104

10 Ard Law Group PLLC

11 P.O. Box 11633

12 Bainbridge Island, WA 98110

13 (206) 701-9243

14 Attorneys for Plaintiffs

15 ALBRECHT LAW PLLC

16 By: 

17 Matthew C. Albrecht, WSBA #36801

18 David K. DeWolf, WSBA #10875

19 421 W. Riverside Ave., Ste. 614

20 Spokane, WA 99201

21 (509) 495-1246

22 Attorneys for Plaintiffs


CERTIFICATE OF SERVICE

I certify under penalty of perjury under the laws of the United States of America that on October 9, 2019, I served the foregoing Notice of Deposition by email as follows:

<p>Office of the Attorney General PO Box 40100 Olympia, WA 98504-0100 Jeff Even jeffe@atg.wa.gov Dionne M. Padilla-Huddleston DionneP@atg.wa.gov Zach P. Jones ZachJ@atg.wa.gov July Simpson RJulyS@atg.wa.gov</p>	<p>Salvatore J Faggiano City Of Spokane 808 W Spokane Falls Blvd Room 550 Spokane, WA 99201-3326 509-625-6225 sfaggiano@spokanecity.org</p>
<p>Leslie Anne Lopez Pamela Hamilton Clark County Prosecuting Attorney’s Office Civil Division PO Box 5000 Vancouver, WA 98665 360-397-2478 leslie.lopez@clark.wa.gov Pamela.Hamilton@clark.wa.gov</p>	<p>Nicholas W. Brown Paul J. Lawrence Sarah S Washburn Gregory J. Wong Kai A. Smith Pacifica Law Group LLP 1191 Second Ave. Ste. 2000 Seattle, WA 98101-3404 nicholas.brown@pacificallawgroup.com paul.lawrence@pacificallawgroup.com sarah.washburn@pacificallawgroup.com greg.wong@pacificallawgroup.com kai.smith@pacificallawgroup.com dawn.taylor@pacificallawgroup.com cindy.bourne@pacificallawgroup.com sydney.henderson@pacificallawgroup.com tricia.okonek@pacificallawgroup.com <i>Attorneys for Intervenor Defendant, Safe Schools Safe Communities</i></p>

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ARD LAW GROUP PLLC

By  _____

Joel B. Ard, WSBA # 40104
Ard Law Group PLLC
P.O. Box 11633
Bainbridge Island, WA 98110
(206) 701-9243
Joel@Ard.law

Attorneys for Plaintiffs

Exhibit D

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5 UNITED STATES DISTRICT COURT
6 FOR THE WESTERN DISTRICT OF WASHINGTON
7 AT TACOMA

7 DANIEL MITCHELL, ROBIN BALL, LUKE
8 RETTMER, ARMEN TOOLOEE,
9 NATHANIEL CASEY, MATTHEW WALD,
10 SECOND AMENDMENT FOUNDATION,
11 AND NATIONAL RIFLE ASSOCIATION,

12 Plaintiffs,

13 v.

14 CHUCK ATKINS, in his official capacity as the
15 Sheriff of Clark County, Washington, CRAIG
16 MEIDL, in his official capacity as the Chief of
17 Police of Spokane, Washington, and TERESA
18 BERNTSEN, in her official capacity as the
19 Director of the Washington State Department
20 of Licensing,

21 Defendants.

No. 3:19-cv-05106-RBL

SUBPOENA FOR THE PRODUCTION OF
DOCUMENTS

22 TO: Teresa Berntsen, in her official capacity as the Director of the Washington State
23 Department of Licensing, through her attorneys of record.

24 Pursuant to Fed. R. Civ. P. 45, you are commanded to produce and permit the
25 inspection and copying at the offices of Sound Reprographics, 403 Madison Avenue,
26 Bainbridge Island, WA 98110, no later than November 8, 2019, and at the request of Plaintiffs
in the above-captioned case, the following documents and tangible things:

All documents reviewed by or relied on by Bernstein's witnesses designated to testify in
response to the Fed. R. Civ. P. 30(b)(6) deposition notice of October 9, 2019.

///
///

1 October 9, 2019.

2

ARD LAW GROUP PLLC

3

By: 

4

Joel B. Ard, WSBA # 40104

5

Ard Law Group PLLC

6

P.O. Box 11633

7

Bainbridge Island, WA 98110

8

(206) 701-9243

Attorneys for Plaintiffs

9

ALBRECHT LAW PLLC

10

By: 

11

Matthew C. Albrecht, WSBA #36801

12

David K. DeWolf, WSBA #10875

13

421 W. Riverside Ave., Ste. 614

14

Spokane, WA 99201

15

(509) 495-1246

16

Attorneys for Plaintiffs

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1 Fed. R. Civ. P. 45(d): Protecting a Person Subject to a Subpoena; Enforcement.

2 (1) Avoiding Undue Burden or Expense; Sanctions. A party or attorney responsible for
3 issuing and serving a subpoena must take reasonable steps to avoid imposing undue burden or
4 expense on a person subject to the subpoena. The court for the district where compliance is
5 required must enforce this duty and impose an appropriate sanction—which may include lost
6 earnings and reasonable attorney’s fees—on a party or attorney who fails to comply.

7 (2) Command to Produce Materials or Permit Inspection.

8 (A) Appearance Not Required. A person commanded to produce documents,
9 electronically stored information, or tangible things, or to permit the inspection of premises,
10 need not appear in person at the place of production or inspection unless also commanded to
11 appear for a deposition, hearing, or trial.

12 (B) Objections. A person commanded to produce documents or tangible things or to
13 permit inspection may serve on the party or attorney designated in the subpoena a written
14 objection to inspecting, copying, testing or sampling any or all of the materials or to inspecting
15 the premises—or to producing electronically stored information in the form or forms
16 requested. The objection must be served before the earlier of the time specified for compliance
17 or 14 days after the subpoena is served. If an objection is made, the following rules apply:

18 (i) At any time, on notice to the commanded person, the serving party may move the
19 court for the district where compliance is required for an order compelling production or
20 inspection.

21 (ii) These acts may be required only as directed in the order, and the order must protect
22 a person who is neither a party nor a party’s officer from significant expense resulting from
23 compliance.

24 (3) Quashing or Modifying a Subpoena.

25 (A) When Required. On timely motion, the court for the district where compliance is
26 required must quash or modify a subpoena that:

(i) fails to allow a reasonable time to comply;

(ii) requires a person to comply beyond the geographical limits specified in Rule 45(c);

(iii) requires disclosure of privileged or other protected matter, if no exception or waiver
applies; or

(iv) subjects a person to undue burden.

(B) When Permitted. To protect a person subject to or affected by a subpoena, the court
for the district where compliance is required may, on motion, quash or modify the subpoena if
it requires:

(i) disclosing a trade secret or other confidential research, development, or commercial
information; or

(ii) disclosing an unretained expert’s opinion or information that does not describe
specific occurrences in dispute and results from the expert’s study that was not requested by a
party.

(C) Specifying Conditions as an Alternative. In the circumstances described in Rule
45(d)(3)(B), the court may, instead of quashing or modifying a subpoena, order appearance or
production under specified conditions if the serving party:

(i) shows a substantial need for the testimony or material that cannot be otherwise met
without undue hardship; and

(ii) ensures that the subpoenaed person will be reasonably compensated.

23 Fed. R. Civ. P. (e): Duties in Responding to a Subpoena.

24 (1) Producing Documents or Electronically Stored Information. These procedures
25 apply to producing documents or electronically stored information:

26 (A) Documents. A person responding to a subpoena to produce documents must
produce them as they are kept in the ordinary course of business or must organize and label
them to correspond to the categories in the demand.

(B) Form for Producing Electronically Stored Information Not Specified. If a subpoena
does not specify a form for producing electronically stored information, the person responding

1 must produce it in a form or forms in which it is ordinarily maintained or in a reasonably usable
form or forms.

2 (C) Electronically Stored Information Produced in Only One Form. The person
3 responding need not produce the same electronically stored information in more than one
form.

4 (D) Inaccessible Electronically Stored Information. The person responding need not
5 provide discovery of electronically stored information from sources that the person identifies
6 as not reasonably accessible because of undue burden or cost. On motion to compel discovery
7 or for a protective order, the person responding must show that the information is not
reasonably accessible because of undue burden or cost. If that showing is made, the court may
8 nonetheless order discovery from such sources if the requesting party shows good cause,
9 considering the limitations of Rule 26(b)(2)(C). The court may specify conditions for the
10 discovery.

11 (2) Claiming Privilege or Protection.

12 (A) Information Withheld. A person withholding subpoenaed information under a
13 claim that it is privileged or subject to protection as trial-preparation material must:

14 (i) expressly make the claim; and

15 (ii) describe the nature of the withheld documents, communications, or tangible things
16 in a manner that, without revealing information itself privileged or protected, will enable the
17 parties to assess the claim.

18 (B) Information Produced. If information produced in response to a subpoena is subject
19 to a claim of privilege or of protection as trial-preparation material, the person making the claim
20 may notify any party that received the information of the claim and the basis for it. After being
21 notified, a party must promptly return, sequester, or destroy the specified information and any
22 copies it has; must not use or disclose the information until the claim is resolved; must take
23 reasonable steps to retrieve the information if the party disclosed it before being notified; and
24 may promptly present the information under seal to the court for the district where compliance
25 is required for a determination of the claim. The person who produced the information must
26 preserve the information until the claim is resolved.


CERTIFICATE OF SERVICE

I certify under penalty of perjury under the laws of the United States of America that on October 9, 2019, I served the foregoing Notice of Deposition by email as follows:

<p>Office of the Attorney General PO Box 40100 Olympia, WA 98504-0100 Jeff Even jeffe@atg.wa.gov Dionne M. Padilla-Huddleston DionneP@atg.wa.gov Zach P. Jones ZachJ@atg.wa.gov July Simpson RJulyS@atg.wa.gov</p>	<p>Salvatore J Faggiano City Of Spokane 808 W Spokane Falls Blvd Room 550 Spokane, WA 99201-3326 509-625-6225 sfaggiano@spokanecity.org</p>
<p>Leslie Anne Lopez Pamela Hamilton Clark County Prosecuting Attorney’s Office Civil Division PO Box 5000 Vancouver, WA 98665 360-397-2478 leslie.lopez@clark.wa.gov Pamela.Hamilton@clark.wa.gov</p>	<p>Nicholas W. Brown Paul J. Lawrence Sarah S Washburn Gregory J. Wong Kai A. Smith Pacifica Law Group LLP 1191 Second Ave. Ste. 2000 Seattle, WA 98101-3404 nicholas.brown@pacificallawgroup.com paul.lawrence@pacificallawgroup.com sarah.washburn@pacificallawgroup.com greg.wong@pacificallawgroup.com kai.smith@pacificallawgroup.com dawn.taylor@pacificallawgroup.com cindy.bourne@pacificallawgroup.com sydney.henderson@pacificallawgroup.com tricia.okonek@pacificallawgroup.com <i>Attorneys for Intervenor Defendant, Safe Schools Safe Communities</i></p>

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ARD LAW GROUP PLLC

By  _____

Joel B. Ard, WSBA # 40104
Ard Law Group PLLC
P.O. Box 11633
Bainbridge Island, WA 98110
(206) 701-9243
Joel@Ard.law

Attorneys for Plaintiffs