

The Honorable Alan R. Hancock  
Date of Motion: \_\_\_\_\_, \_\_\_\_\_ p/a.m.  
Nature of Motion: \_\_\_\_\_  
With/Without Oral Argument

IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON  
IN AND FOR THE COUNTY OF ISLAND

ROBERT WILBUR and DUSTIN  
FREDERICK,

Plaintiffs,

vs.

ADMIRAL'S COVE BEACH CLUB, a  
Washington non-profit corporation; and JEAN  
SALLS, MARIA CHAMBERLAIN, KAREN  
SHAAK, ROBERT PEETZ, ELSA PALMER,  
ED DELAHANTY AND DAN JONES,  
individuals,

Defendants.

NO. 13-2-00741-4

DECLARATION OF KAREN SHAAK  
IN SUPPORT OF DEFENDANTS  
SALLS, CHAMBERLAIN, SHAAK,  
PEETZ, AND JONES' (1) MOTION  
FOR SUMMARY JUDGMENT  
BASED ON MOOTNESS AND  
(2) MOTION TO DROP MOVING  
DEFENDANTS PURSUANT TO  
CR 21 AND/OR DISMISS PURSUANT  
TO CR 56

I, Karen Shaak, hereby certify under penalty of perjury, that the following is true and correct and within my personal knowledge:

1. I am over the age of 18, have personal knowledge of all facts contained in this declaration and am competent to testify as a witness to those facts.

2. I was the Secretary of the Admiral's Cove Beach Club ("ACBC") Board of Directors at all times relevant to the plaintiffs' Complaint.

SHAAK DECLARATION RE DEFENDANTS SALLS,  
CHAMBERLAIN, SHAAK, PEETZ, AND JONES'  
(1) MOTION FOR SUMMARY JUDGMENT AND  
(2) MOTION TO DROP MOVING DEFENDANTS AND/OR  
DISMISS PURSUANT TO CR 56

675220.1/022214 0603/77180073

- 1 -

Betts  
Patterson  
Mines  
One Convention Place  
Suite 1400  
701 Pike Street  
Seattle, Washington 98101-3927  
(206) 292-9988



1 **CERTIFICATE OF SERVICE**

2 I, Valerie D. Marsh, declare as follows:

3 1) I am a citizen of the United States and a resident of the State of Washington. I am  
4 over the age of 18 years and not a party to the within entitled cause. I am employed by the law  
5 firm of Betts, Patterson & Mines, P.S., whose address is One Convention Place, Suite 1400,  
6 701 Pike Street, Seattle, Washington 98101-3927.

7 2) By the end of the business day on February 22, 2014, I caused to be served upon  
8 counsel of record at the addresses and in the manner described below, the following documents:

- 9 • **Declaration Of Karen Shaak In Support Of Defendants Salls, Chamberlain, Shaak, Peetz, And Jones' (1) Motion For Summary Judgment Based On Mootness And (2) Motion To Drop Moving Defendants Pursuant To CR 21 And/Or Dismiss Pursuant To CR 56; and**
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- 11
- 12 • **Certificate of Service.**

13 *Counsel for Plaintiffs:*

Christon C. Skinner	<input type="checkbox"/>	U.S. Mail
Law Offices of Christon C. Skinner, P.S.	<input type="checkbox"/>	Hand Delivery
791 SE Barrington Drive	<input type="checkbox"/>	Telefax
Oak Harbor, WA 98277-3278	<input type="checkbox"/>	UPS
	<input type="checkbox"/>	E-mail

14 *Counsel for Defendants Palmer & Delahanty:*

Christopher J. Nye	<input type="checkbox"/>	U.S. Mail
Reed McClure	<input type="checkbox"/>	Hand Delivery
Two Union Square	<input type="checkbox"/>	Telefax
601 Union Street, Suite 4901	<input type="checkbox"/>	UPS
Seattle, WA 98101-3920	<input type="checkbox"/>	E-mail

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

SHAAK DECLARATION RE DEFENDANTS SALLS,  
CHAMBERLAIN, SHAAK, PEETZ, AND JONES'  
(1) MOTION FOR SUMMARY JUDGMENT AND  
(2) MOTION TO DROP MOVING DEFENDANTS AND/OR  
DISMISS PURSUANT TO CR 56

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1 DATED this 22nd day of February, 2014.  
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Valerie D. Marsh  
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25 SHAAK DECLARATION RE DEFENDANTS SALLS,  
CHAMBERLAIN, SHAAK, PEETZ, AND JONES'  
(1) MOTION FOR SUMMARY JUDGMENT AND  
(2) MOTION TO DROP MOVING DEFENDANTS AND/OR  
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