

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 ROBERT PEETZ
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, Robert Peetz, 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 _____ at all times relevant to the plaintiffs' Complaint.

PEETZ 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

675225.1/022214 0602/77180073

- 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 Robert Peetz 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**
- 10 • **Certificate of Service.**

11 *Counsel for Plaintiffs:*

12 Christon C. Skinner
13 Law Offices of Christon C. Skinner, P.S.
14 791 SE Barrington Drive
15 Oak Harbor, WA 98277-3278

- 16 U.S. Mail
- Hand Delivery
- Telefax
- UPS
- E-mail

17 *Counsel for Defendants Palmer & Delahanty:*

18 Christopher J. Nye
19 Reed McClure
20 Two Union Square
601 Union Street, Suite 4901
Seattle, WA 98101-3920

- U.S. Mail
- Hand Delivery
- Telefax
- UPS
- E-mail

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

23
24
25 PEETZ 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 PEETZ 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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