

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 DAN JONES 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, Dan Jones, 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.

JONES 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

675226.2/022214 0600/77180073

- 1 -

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

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3. The \$200,000 cost to completely remove the pool was a number presented by Ed Delahanty.

4. In my individual capacity, I have no intention nor authority to remove the pool, control the ACBC election, or conduct any ACBC business that would be in violation of the governing documents.

DATED this 22nd day of February, 2014, at \_\_\_\_\_, Washington.

\_\_\_\_\_  
Dan Jones

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 Dan Jones 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
- 11
- 12 • **Certificate of Service.**

13 *Counsel for Plaintiffs:*

14 Christon C. Skinner  
15 Law Offices of Christon C. Skinner, P.S.  
16 791 SE Barrington Drive  
Oak Harbor, WA 98277-3278

- 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.

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25 JONES 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 JONES DECLARATION RE DEFENDANTS SALLS,  
CHAMBERLAIN, SHAAK, PEETZ, AND JONES'  
(1) MOTION FOR SUMMARY JUDGMENT AND  
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