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5 **IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON**

6
7 **IN AND FOR THE COUNTY OF ISLAND**

8 ROBERT WILBUR and DUSTIN
9 FREDERICK,
10
11 Plaintiffs,

NO. 13-2-00741-4

vs.

12 **DECLARATION OF LYDIA**
13 **BARTHOLOMEW RE:**
14 **CORLISS MOTION FOR**
15 **SUMMARY JUDGMENT**

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

23 Defendants.

24 **UNDER PENALTY OF PERJURY AND PURSUANT TO THE LAWS OF THE**
25 **STATE OF WASHINGTON, I CERTIFY THAT THE FOLLOWING IS TRUE AND**
26 **CORRECT:**

27 My name is Lydia Bartholomew MD. I am over the age of 18 and I make this
28 declaration based on my own personal knowledge of the facts and offer it in opposition
29 to the motion submitted by Susan Corliss as intervenor in this lawsuit.

30 I built my home in Admirals Cove in 1994, having purchased the property a few
31 years earlier. I am a member in good standing of the Admirals Cove Beach Club.
32 When I purchased my property, it was evident in the purchasing documents that I was
a member of that Club, which entitled my family to enjoy full access to its competition-

1 size swimming pool. And in fact, my children did spend their summers in the pool and
2 have multiple birthday parties in the shelter with the pool as the main attraction.

3 The pool was an important factor in my decision to purchase in Admirals Cove,
4 and I assumed it would add to the value and salability of the property at such time as I
5 decide to sell. In fact, I deemed the pool and other facilities to be so unique and such a
6 draw, that I subsequently purchased another lot in Admiral's Cove to hold as an
7 investment.
8

9 Prior Boards failed to exercise their responsibility to maintain the pool by
10 wrongly delegating their sole maintenance authority to the general membership for
11 approval, in violation of the Club's governing documents. Those failures have
12 compounded over the years because dues were not set to ensure funds needed for
13 effective maintenance. As a result, the pool now requires past-due repairs.
14


15 This failure to maintain the pool will, if not properly attended to as assured by
16 the Articles of Incorporation in Article V, Paragraph 1, impact the recreational and
17 athletic opportunities for my family, damage the value of my investments, and violate
18 the trust I placed in the governing documents and the boards. The impact would be
19 permanent, irreversible, and from my perspective, wrong.
20

21 My understanding is that the cost to repair the pool on a per owner basis is
22 small in comparison to the loss of investment value (not to mention personal
23 enjoyment) that will occur if the pool were to be demolished. Such a pool, in such an
24 amazing location, would not be replaceable at a later time. I would not have invested
25 in my properties had I thought the pool would go away.
26

27 Ms. Corliss and her small support group, do not represent the majority of the
28 Club members. None of these anti-pool members were elected to the Board in 2013 or
29 in 2014, whereas all pro-pool candidates were, a clear indication of the will of the
30 majority of the community.
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I
Dated this 27 day of January, 2015, at Edmonds, Washington.


Lydia Bartholomew MD MHA

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IN AND FOR THE COUNTY OF ISLAND

5 ROBERT WILBUR and DUSTIN
6 FREDERICK,
7
8 Plaintiffs,

NO. 13-2-00741-4

GR 17 DECLARATION

vs.

9 ADMIRAL'S COVE BEACH CLUB, a
10 Washington non-profit corporation; et al.,
11
12 Defendants.

13
14 _____
15 SUE CORLISS,

Intervenor,

vs.

16 DUSTIN FREDERICK, ROBERT
17 WILBUR, et al.,
18
19 Defendants.

20 UNDER PENALTY OF PERJURY AND PURSUANT TO THE LAWS OF THE
21 STATE OF WASHINGTON, I CERTIFY THE FOLLOWING TO BE TRUE AND
22 CORRECT:

23 I, Linda Williams, am assistant to Christon C. Skinner who is the attorney of
24 record for the plaintiffs herein. I received a document entitled Declaration of Lydia
25 Bartholomew Re: Corliss Motion for Summary Judgment from Lydia Bartholomew by
26 electronic transmission.

27 I further declare that prior to signing this affidavit, I did examine the document,
28 determined that it consisted of three pages and that the document was complete and
29 legible.

30 DATED this 27th day of January, 2015, at Oak Harbor, Washington.

31
32 
Linda Williams