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**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 MIKE
BRICE RE: CORLISS MOTION
FOR SUMMARY JUDGMENT**

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

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

My wife, Sue Brice, and I purchased our property at 139 Keystone,
Coupeville, WA, in Admirals Cove in September of 1998, and we are members in
good standing of the Admirals Cove Beach Club. When we purchased the
property, it was evident in the purchasing documents that I was a member of that
Club, which entitled me and my family to enjoy full access to its competition-size
swimming pool.

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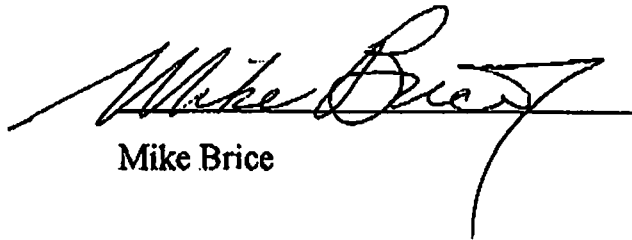
The pool was an important factor in our decision to purchase in Admirals Cove, and we assumed it would add to the value and salability of the property at such time as we decide to sell.

Prior Boards, however, failed to exercise their responsibility, despite concerns and warnings from members that the board was not collecting sufficient funds, to maintain the pool by wrongly delegating their sole maintenance authority to the general membership for approval, in violation of the Club's governing documents. Those failures have compounded over the years because dues were not set to ensure funds needed for effective maintenance. As a result, the pool now requires past-due repairs.

This failure to maintain the pool will, if not properly attended to as assured by the Articles of Incorporation in Article V, Paragraph 1, will impact the recreational and athletic opportunities for me and my family, and damage the value of my investment, and as such, is an unanticipated violation of trust I placed in the governing documents and the boards.

Ms. Corliss and her small support group, mostly the former anti-pool board members, do not represent the majority of the Club members, as evidenced by the fact that none of these anti-pool members were elected to the Board in 2013 or in 2014, whereas all pro-pool candidates were.

Dated this 26th day of January, 2015, at Redmond, Washington.



Mike Brice

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

ROBERT WILBUR and DUSTIN
FREDERICK,

Plaintiffs,

vs.

NO. 13-2-00741-4

GR 17 DECLARATION

ADMIRAL'S COVE BEACH CLUB, a
Washington non-profit corporation; et al.,

Defendants.

SUE CORLISS,

Intervenor,

vs.
DUSTIN FREDERICK, ROBERT
WILBUR, et al.,


Defendants.

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

I, Linda Williams, am assistant to Christon C. Skinner who is the attorney of
record for the plaintiffs herein. I received a document entitled Declaration of Mike
Brice Re: Corliss Motion for Summary Judgment from Mike Brice by facsimile.

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

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



Linda Williams