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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,

NO. 13-2-00741-4

vs.

**DECLARATION OF ELINOR T.
GUINN RE: CORLISS MOTION
FOR SUMMARY JUDGMENT**

**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.

**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 Elinor T. Guinn 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 husband, Lester Guinn and I purchased our property in Admirals Cove in
1969, and we are members of the Admirals Cove Beach Club in good standing . When
we purchased our property, the purchasing documents and deed said that we were a
member of that Club, which entitled us and our family with full access to its
competition-size swimming pool.

1 The pool was an important factor in our decision to purchase in Admirals Cove,
 2 as our children were avid swimmers, and we assumed it would add to the value of the
 3 property if we decided to sell.

4 Prior Boards, did not take their responsibility to maintain the pool by wrongly
 5 delegating their sole maintenance authority to the general membership for approval, in
 6 violation of the Club's governing documents. Those failures have compounded over
 7 the years. Dues were not set to ensure funds needed for effective maintenance. The
 8 pool now requires past-due repairs, as a result of this negligence.
 9

10 This failure to maintain the pool will, if not properly attended to as assured by
 11 the Articles of Incorporation in Article V, Paragraph 1, impact the recreational and
 12 athletic opportunities for us and our family. This will damage the value of our
 13 investment, thus, is an unanticipated violation of trust we placed in the governing
 14 documents and the boards.
 15

16 Ms. Corliss and her small support group, mostly the former anti-pool board
 17 members, do not represent the majority of the Club members. This was shown by the
 18 fact that none of these anti-pool members were elected to the Board in 2013 or in
 19 2014, whereas all pro-pool candidates were.
 20

21 Dated this 27th day of January, 2015, at Bellevue, Washington.

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 23 *Elinor T. Guinn*
 24 _____
 25 Elinor T. Guinn
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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,

NO. 13-2-00741-4

GR 17 DECLARATION

vs.

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 Elinor T.
Guinn Re: Corliss Motion for Summary Judgment from Elinor Guinn 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