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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 SANDI
HULL 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 Sandi Hull and I am over the age of 18 and I make this declaration based in opposition to the motion submitted by Susan Corliss as intervenor in this lawsuit.

I am half-owner of our family-owned property at 103 Keystone Ave. in Admirals Cove. The house was originally built by my deceased husband's parents, George L Hull and Margaret Hull in 1969-1970. Along with my two sons, Richard B Hull and wife jodee, and daughter Cynthia Hull J Wimmer and husband Mathew now also share property ownership, we are members in good standing of the Admirals Cove Beach Club. From the onset, the Hull family supported and have greatly valued the pool and the

1 membership in the beach club. We now have four generations who have
2 greatly enjoyed the beach club and sharing the pool with friends and family
3 members.

4 The pool was an important factor the Hull's decision to purchase
5 and build in Admirals Cove, and as half-owner today, and as a licensed real
6 estate broker, I strongly believe the pool adds to the value and salability of
7 the property should we or other owners ever decide to sell.


8
9 I also recently sold a property in the Admirals Cove to a cousin who
10 bought knowing they also had use of the lovely pool for their children and
11 grandchildren.

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

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

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

28 Dated this 26th day of January, 2015, at 16724 S.E. 28th
29 Washington. Bellevue, WA. 98068

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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 Sandi
Hull Re: Corliss Motion for Summary Judgment from Sandi Hull 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