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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 **Plaintiffs,**

11 vs.

NO. 13-2-00741-4

12 **ADMIRAL'S COVE BEACH CLUB, a**
13 **Washington non-profit corporation;**
14 **and JEAN SALLS, MARIA**
15 **CHAMBERLAIN, KAREN SHAAK,**
16 **ROBERT PEETZ, ELSA PALMER,**
17 **ED DELAHANTY AND DAN JONES,**
18 **individuals,**

Defendants.

DECLARATION OF HARRY
LYMAN RE: CORLISS
MOTION FOR SUMMARY
JUDGMENT

19
20 **UNDER PENALTY OF PERJURY AND PURSUANT TO THE LAWS OF THE**
21 **STATE OF WASHINGTON, I CERTIFY THAT THE FOLLOWING IS TRUE AND**
22 **CORRECT:**

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25 My name is Harry Lyman and I am over the age of 18 and I make this
26 declaration based on my own personal knowledge of the facts and offer it in opposition
27 to the motion submitted by Susan Corliss as intervener in this lawsuit.

28 I purchased my property in Admirals Cove in 1995 and am a member in good
29 standing of the Admirals Cove Beach Club. When I purchased my property, it was
30 evident in the purchasing documents that I was a member of that Club, which entitled
31 me and my family to enjoy full access to its competition-size swimming pool.
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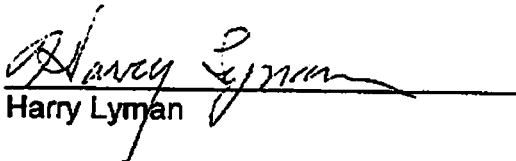
The pool was ***the most important factor*** in my decision to purchase in Admirals Cove, and I assumed it would add to the value and salability of the property at such time as I decide to sell.

Prior Boards, however, failed to exercise their responsibility 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 27 day of January, 2015, at Coupeville, Washington.


Harry Lyman

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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 Harry
Lyman Re: Corliss Motion for Summary Judgment from Harry Lyman 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