

1 IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON

2 IN AND FOR THE COUNTY OF ISLAND

3 -----

4 ROBERT WILBUR and DUSTIN)
 FREDERICK,)
 5)
 Plaintiffs,)
 6)
 vs.) Cause No: 13-2-00741-4
 7)
 ADMIRAL'S COVE BEACH CLUB, a)
 8 Washington non-profit)
 Corporation; and JEAN SALLS,)
 9 MARIA CHAMBERLAIN, KAREN)
 SHAAK, ROBERT PEETZ, ELSA)
 10 PALMER, ED DELAHANTY AND DAN)
 JONES, individuals,)
 11)
 Defendants.)

12 -----

13 SUE CORLISS,)
)
 Intervenor,)
 14)
 vs.)
 15)
 DUSTIN FREDERICK, ROBERT)
 16 WILBUR, ADMIRAL'S COVE BEACH)
 CLUB, a Washington non-profit)
 17 corporation, and its BOARD OF)
 DIRECTORS,)
 18)
 Defendants.)

19 -----

20 Verbatim Report of Proceedings

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22

23 BE IT REMEMBERED, that on Monday,
 24 November 17, 2014, the above-named and numbered cause
 25 came on regularly for hearing before the HONORABLE

1 ALAN R. HANCOCK, sitting as judge in the above-entitled
2 court, at the Island County Courthouse, in the town of
3 Coupeville, state of Washington.

4 The plaintiffs appeared through their
5 attorney, Criston C. Skinner;

6 The defendant Admiral's Cove Beach Club
7 appeared through its attorney, Christopher J. Nye;

8 The intervenor appeared through her
9 attorney, Jay Carlson.

10 WHEREUPON, the following proceedings were
11 had, to-wit:

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1 THE COURT: Next we have the matter of
2 *Wilbur v. Admiral's Cove Beach Club*. There are two
3 matters scheduled today, the motion to intervene and
4 motion for summary judgment. I have read all of the
5 papers and pleadings, prepared to hear argument.
6 There's a voluminous record, but I have read all of that
7 material. And so let me just orient myself here with
8 the documents. One moment, please.

9 I would assume that we would need to hear
10 the motion to intervene by Ms. Corliss at the outset.
11 Mr. Carlson.

12 MR. CARLSON: That's me, Your Honor.

13 THE COURT: Okay.

14 MR. CARLSON: Thank you very much.

15 THE COURT: Do the parties agree to hear the
16 motion to intervene at the outset?

17 MR. SKINNER: And, Your Honor, as a further
18 footnote to that, if the Court should grant the motion,
19 we're going to be rescheduling the motion for summary
20 judgment since I think procedurally we're in a little
21 bit of an awkward spot here with the response having
22 been filed at a time before this party was even a party,
23 so just so the Court is aware that that's how I'd
24 proceed. If the Court does not allow intervention, then
25 we will go forward.

1 THE COURT: I understand. Let's hear
2 argument on the motion to intervene. Mr. Carlson.

3 MR. CARLSON: Thank you, Your Honor. And
4 perhaps after we hear your -- if you rule today on the
5 intervention, perhaps we could address the issue of a
6 continuance.

7 I think the intervention request is pretty
8 straightforward, and you've seen it laid out in the
9 briefing before you. As the Court may recall, the case
10 concerns whether or not there is going to be the
11 continued operation of a swimming pool in the Admiral's
12 Cove development. There are approximately 600 property
13 members within that development who have an interest in
14 the outcome of that issue. Mr. Wilbur is one of 600.
15 Up until recently, the Board had been opposing
16 Mr. Wilbur's position in this litigation, and you may
17 recall the Board actively opposed his request for a
18 temporary restraining order, which was entered at the
19 end of 2013.

20 The Board has changed its composition and
21 has changed its position. And so the current request
22 from Mr. Wilbur is seeking summary judgment on all of
23 his claims, he's seeking a declaratory judgment on all
24 of his claims, and a permanent mandatory injunction.
25 The nature of his relief requested has changed

1 dramatically, and he's now seeking an order that will
2 directly impact all 600 members of the Cove because he's
3 asking -- essentially, he's asking the Court to take
4 over the management of the swimming pool, budgeting for
5 the club, assessments of the club, and he's asked for an
6 order affirmatively directing the club to conduct
7 repairs, which will cost, by recent inspection and
8 estimate, about \$650,000, and implement a budget
9 including assessments against members to pay for those
10 repairs. So there's 600 members sitting there, of which
11 Mr. Wilbur is only one, with an outcome -- with an
12 interest in the outcome of the litigation.

13 The only two issues under our Rule 24
14 request are, does Ms. Corliss have an interest in the
15 outcome of the litigation and are her interests
16 adequately represented here?

17 So I think the interest is clear. She has
18 the exact same legal relationship to the swimming pool,
19 to the club, to the Board as does Mr. Wilbur. And
20 intervention is really just sort of a jurisdictional
21 issue. She has the exact same standing in the case as
22 Mr. Wilbur has.

23 Also, because of the new nature of the
24 request sought, final order mandating assessments
25 against members to pay for very expensive repairs,

1 that's a direct interest that she has in the outcome.
2 And you've seen, if you've reviewed the summary judgment
3 papers we submitted, there's 12 property owners in the
4 Cove who have come forward and submitted declarations
5 opposing Mr. Wilbur's request.

6 So all we're really asking for on
7 intervention is to allow those folks to have a voice in
8 the case. And I think Rule 24, mandatory intervention,
9 we easily meet the standard for it.

10 In terms of the argument as to whether the
11 interests are adequately represented, I think it's clear
12 now that they're not. The Board has filed a response to
13 the summary judgment where it says, we're not taking a
14 position. We don't oppose it. And in their briefing
15 they actually ask the Court to enter a final order
16 ending the case. So in that sense, I think it's fair to
17 say the Board is supporting Mr. Wilbur's motion for
18 summary judgment. Certainly not opposing it.

19 So Ms. Corliss wants to oppose it, and her
20 interests aren't represented here. There's no one else
21 who's opposing it.

22 The timeliness issue, I think it's
23 absolutely clear under binding case law that an
24 intervention request filed before trial is, by
25 definition, timely. We quoted those cases to you twice.

1 The *Columbia Gorge* case is the most recent case quoting
2 the State Supreme Court. So I don't think there's any
3 timeliness issue. The language in some of the cases
4 talking about how to evaluate timeliness, those are all
5 cases where the case is on appeal or even post-appeal.
6 There have been cases that have evaluated whether or not
7 intervention can happen post-appeal. When it's sought
8 pretrial, it's timely. And I think this request is
9 timely.

10 Their request has been brought before their
11 summary judgment has been heard, so it's timely in that
12 sense as well, and the timing is based upon the Board's
13 recent change in position. So up until the Board filed
14 their brief, in October of this year, I believe, the
15 community understood the Board was opposing Mr. Wilbur.
16 So that changed only recently. That is what in fact
17 motivated Ms. Corliss to come forward now.

18 The last thing I want to just say is they've
19 argued that this is going to increase the burden and you
20 should deny intervention on that basis. I don't think
21 there's any legal basis to deny intervention based on
22 burden.

23 I also think it's fair to point out that
24 really all Ms. Corliss is seeking to do is oppose a
25 plaintiff's summary judgment, and I don't think it's

1 unduly burdensome for a plaintiff who filed the lawsuit
2 to have to meet the standard of proof against
3 opposition. That's the litigation system that we have.
4 So I don't think there is any fair burden issue.

5 As to the argument that you'll have to allow
6 all 600 members now to intervene individually once
7 Ms. Corliss is allowed to intervene, there's someone in
8 the case representing the interests of opposition to
9 Mr. Wilbur. So if another Cove member comes forward and
10 requests intervention, you probably could deny that
11 because that person's interests would already be
12 adequately represented in the case. But the very
13 substantial number of Cove members who oppose
14 Mr. Wilbur's request and do not want this swimming pool
15 and do not want to pay to repair it, do deserve a voice
16 in this case on intervention. That's all we're asking.
17 I would ask you respectfully to grant the request for
18 intervention.

19 THE COURT: Thank you very much. Of course,
20 I recognize Mr. Skinner, and Mr. Nye here, presumably
21 for the corporation, the nonprofit corporation. Let's
22 hear from Mr. Skinner.

23 MR. SKINNER: Thank you, Your Honor. Your
24 Honor, a couple of the premises that are being argued
25 need to be dispelled. Firstly, the Board that was

1 previously in office was wrong in its legal
2 understanding of what they should be doing. The Court
3 has determined at a temporary injunction hearing that
4 the Board's activities were essentially ultra vires,
5 that they were acting beyond the scope of what they were
6 authorized to do.

7 So to come in here and say, well, we want to
8 have an opportunity to argue a different position, is
9 essentially to say, we were unsuccessful as litigants as
10 people who constituted the majority of the Board at the
11 time this suit was brought, so we'd like another bite at
12 the apple by coming in and intervening here at the last
13 minute.

14 The Board was wrong, and the Court made a
15 decision that could not have been made unless the Court
16 concluded that it was likely that the plaintiff would
17 prevail on the merits of the case.

18 As you may recall, a temporary injunction is
19 not permitted unless the Court takes a look at the
20 merits and decides that it's more likely than not that
21 the plaintiff will prevail on its request. So that
22 Board that used to be in office was in a legally
23 untenable position and apparently they want to keep
24 arguing that same position and insist that that gives
25 them -- just because it's a contrary position that

1 somehow they have the right to come in here at the last
2 minute and substitute their judgment for the
3 newly-elected Board.

4 It's also important to point out, as the
5 association did in its responsive pleadings, that not
6 once but twice have the people that are represented in
7 Ms. Corliss' motion not been successful in appointing
8 representatives to the Board. This organization is
9 governed by a board. All of the decisions pertaining to
10 the assessments and the use of the pool, other than
11 those the Court may direct, are made at the Board level.
12 They're not made by individual homeowners. Those
13 homeowners have every right to campaign for a Board
14 member that they believe may represent their interests,
15 as they did in this last election. Mr. Carlson's
16 clients were unsuccessful. They represent a small
17 minority of the homeowners, not this vast majority that
18 he would portray.

19 Having said that, the question that the
20 Court has to decide on a legal basis is not just the two
21 issues, but there's actually three matters that have to
22 be considered, and in each case the Court has to answer
23 them affirmatively: whether there's an interest in the
24 suit, whether that interest is being impaired, and,
25 finally, whether the interest is being adequately

1 represented. And these are not factors for
2 consideration. Each has to be determined in the
3 affirmative in order for the intervenor to be successful
4 in their efforts.

5 With respect to the interest, I suppose
6 anyone could say they have an economic interest in this
7 case who is a member of this association, but those
8 interests are being adequately represented by the
9 elected representatives who have the sole authority to
10 make decisions about what the Board and what the
11 association does. In fact --

12 THE COURT: Aren't they basically now in
13 support of what relief Mr. Wilbur is seeking?

14 MR. SKINNER: The Board is, essentially, but
15 not --

16 THE COURT: They're not representing the
17 parties who oppose the relief that he's seeking?

18 MR. SKINNER: They're not opposing it
19 either. They're simply in a position where they have
20 taken -- they've taken a route where they've said to the
21 Court that they are not advocating the specific position
22 that Mr. Wilbur is advocating because there are a number
23 of people who are in the Cove, maybe a dozen or perhaps
24 more, dozen that we know of based on the filed
25 declarations, but certainly the Board has taken a

1 responsible position by looking at the legal issues that
2 are before the Court and not asserting a position that
3 is contrary to law after having considered advice from
4 their own counsel.

5 This Board has sat down and made a decision
6 with the assistance of counsel about the lawful and
7 proper way to proceed in this lawsuit. Once in a while,
8 after a court has made a fairly specific and definitive
9 ruling, to continue to struggle and fight and incur
10 costs when it's pretty obvious how things are going to
11 end up, is not a good use of your association's money
12 and it, frankly, borders on a CR 11 issue in some
13 situations.

14 The intervention of this particular party
15 isn't going to add anything to the analysis. The Court
16 is being advised by two parties who have differing
17 interests in this case, who have looked at the issues as
18 the Court has identified them in the prior hearings, and
19 ultimately intervention is not going to do anything for
20 this case that can't be done at the Board level.

21 If Ms. Corliss' group and the people who are
22 represented by her faction, if you want to call it that,
23 are successful in persuading the other members of this
24 organization that the Board should take a different
25 direction, then at the next election that's what will

1 happen. But this Board is charged with representing the
2 organization in litigation and is doing that at this
3 point in time in making the decisions that it believes
4 are in the best interests of the Cove.

5 If we do allow intervention in this case,
6 what's to say that the other 599 members won't be here
7 asking to have their point of view considered as well?
8 Because there could be a number of variances on the
9 theme based on what each person thinks the money ought
10 to be spent on or not spent on.

11 The other factor that the Court should
12 consider, and that is the convenience and timing of
13 this, is, as Ms. Corliss' counsel argues, it's not a
14 bright line. Just because you file before trial doesn't
15 mean you're in and the timeliness issue is not
16 considered. The Court is to look at timeliness in a
17 sense that it could affect the impact -- or the impact
18 on this particular decision affects the other parties.
19 So timeliness, the amount of notice that the other party
20 may have had about the pendency of this litigation,
21 those are all factors that the case law says the Court
22 is to consider in determining whether or not this is
23 timely; meaning, did you sit on your rights and wait
24 until the last hour or is there a legitimate reason for
25 not being in the case sooner?

1 The intervenor has articulated what they
2 perceive to be a change in position. That's not
3 necessarily true in this case. The thing that has
4 changed is that the Board has gotten more realistic and
5 has taken a look at the Court's prior decision
6 recognizing the law that says that if a temporary
7 injunction has been previously entered then it's likely
8 that this plaintiff is going to prevail at the final
9 hearing, and for that reason this Board apparently has
10 decided it's not going to waste time and money mounting
11 an opposition when that is clearly not the intent of its
12 constituents and it's not lawfully a reasonable position
13 to take.

14 So for those reasons and the fact that the
15 interests of the association is being adequately
16 represented by the Board, the Court should deny
17 intervention and not allow Ms. Corliss to delay the
18 disposition of this case any further.

19 THE COURT: Thank you very much. Mr. Nye.

20 MR. NYE: Thank you, Your Honor. First --
21 and I should clarify this at the outset. The Board is
22 not in agreement completely with the relief sought.
23 Okay. The Board has asked the Court to make a final
24 ruling in this case in accordance with the current state
25 of the governing documents of the club. And we would

1 hope that any final relief granted by the Court would be
2 continued upon the current status of the governing
3 documents. Those documents provide a method by which
4 the members can vote to change those Bylaws so that the
5 Board may be free to take the club in a different
6 direction. We think any relief granted in this case
7 should allow for that opportunity, should let the
8 democratic process play out and the club can do what it
9 wants. So we are not in agreement with a permanent
10 injunction that's going to bind this club forever.

11 But on the point of intervention, I just
12 want to make one point about the standing issue.
13 Ms. Corliss is not in the same shoes as Mr. Wilbur. One
14 year ago -- approximately one year ago today, during the
15 hearing on the motion for that temporary restraining
16 order, you astutely pointed out that plaintiff,
17 Mr. Wilbur -- I think Mr. Frederick was also a plaintiff
18 at that time. He has since been dismissed from the
19 case. But you stated that plaintiffs have the right
20 under the Washington Nonprofit Corporation Act to assert
21 the Board of Directors is acting beyond the scope of its
22 authority. You cited to RCW 24.03.040(1). That is the
23 basis for Mr. Wilbur to be able to challenge the actions
24 of the Board.

25 Here, Ms. Corliss is not alleging that the

1 Board is doing anything beyond the scope of the powers
2 granted to it by the governing documents. I think
3 that's a crucial distinction in this case.

4 All the people involved are members of this
5 club and therefore bound by the club's governing
6 documents, and those documents are very clear, that the
7 authority to act on behalf of the club in all matters
8 and business affairs rests exclusively with the Board of
9 Directors.

10 We get that Ms. Corliss isn't happy that
11 we're not fighting tooth and nail against this motion,
12 but my clients also feel like they're in a position
13 where they can't do that without ignoring the interests
14 of some of the members of the club. But I think that
15 the last two director elections have been a clear
16 indication of attitudes of the members of the club, what
17 they want to see happen, and really just based on the
18 governing documents alone Ms. Corliss does not have the
19 right to inject herself in club affairs.

20 THE COURT: Thank you very much. Because of
21 the ruling I'm about to make, I find it unnecessary to
22 hear further argument from Mr. Carlson.

23 Sue Corliss, a person who owns property in
24 the subdivision of Admiral's Cove, and a member of the
25 beach club presumably, has brought a motion to intervene

1 in this case. CR 24 provides that there is a right to
2 intervene if, among other things, an applicant claims an
3 interest relating to the property or transaction which
4 is the subject of the action and is so situated that the
5 disposition of the action may, as a practical matter,
6 impair or impede her ability to protect that interest
7 unless the applicant's interest is adequately
8 represented by existing parties.

9 Subsection (b) of the rule provides for
10 permissive intervention also, and, among other things,
11 intervention is permissive when an applicant's claim or
12 defense and the main action have a question of law or
13 fact in common, and the rule goes on to state additional
14 matters which counsel are well familiar with.

15 To use the test that Mr. Skinner outlined,
16 the first issue would be whether Ms. Corliss claims an
17 interest here that is not adequately represented by
18 other parties and would be impaired if the claim of
19 Mr. Wilbur is granted. She clearly has made that
20 showing that she has such an interest. She claims,
21 among other things, that the relief that Mr. Wilbur is
22 seeking in this case is ultra vires, is beyond the scope
23 of the authority of the Board to allow -- or for the
24 Court to order.

25 There might be some misunderstanding about

1 that, but clearly she has made a claim that would
2 indicate that in her understanding the relief that is
3 being sought by Mr. Wilbur is beyond the scope of the
4 Court's authority to grant. So she clearly has that
5 interest and that would be impaired if the Court were to
6 grant the motion for summary judgment resolving the case
7 in Mr. Wilbur's favor.

8 And then as far as the matter of whether
9 Ms. Corliss' interest is being adequately represented,
10 it apparently is not because of the change in the
11 composition of the Board members. I did a fairly
12 extensive review of the file here, and there are
13 declarations in the record, and, of course, information
14 submitted in connection with the present pending matters
15 as well, that indicate that there's been a substantial
16 change in the majority of the Board, and the majority of
17 the Board at this point is what you might call pro pool
18 to use the vernacular. And that's been a substantial
19 change. Just the fact that the defendant nonprofit
20 corporation, Admiral's Cove Beach Club, is just allowing
21 this to be placed before the Court for a ruling
22 indicates that the beach club itself is not vigorously
23 advocating for any position necessarily opposed to
24 Mr. Wilbur.

25 The motion is granted. I'm clearly going to

1 permit Ms. Corliss to intervene here for all of the
2 reasons that she has cited here. It would clearly be
3 appropriate to allow that. I'm mindful that it comes
4 late in the game, as it were, after the motion for
5 summary judgment was made, but under the circumstances
6 of the present case, it's clearly appropriate to permit
7 her to intervene and to advocate positions which would
8 not otherwise be advocated.

9 The court system functions best when we have
10 a true clash of adversaries where issues are framed and
11 vigorously advocated by persons who have opposing
12 interests and opposing viewpoints as to what the law is
13 and what the facts are, and this case will be advanced
14 in terms of the policy of the court by having someone
15 who will advance the positions that Ms. Corliss will
16 presumably be advancing.

17 I'll just say in passing that there was a
18 very substantial question as to whether the Court would
19 even rule on the merits of the motion for summary
20 judgment under the present status of the case before
21 Ms. Corliss intervened or moved to intervene because in
22 order to have a proper case under the Uniform
23 Declaratory Judgments Act, there must be an actual and
24 existing controversy. And one of the possible avenues
25 that the Court could have taken here would be to find

1 that there is no actual and existing controversy and
2 dismiss the case on procedural grounds as opposed to
3 ruling on the merits under the previous posture of the
4 parties. So I'm granting the motion for intervention.

5 That brings the Court to the matter of the
6 scheduling of the summary judgment motion. I think that
7 given Mr. Skinner's indication that he would like to
8 reschedule that, I believe it's a party's right who
9 brings a motion to reschedule unless there's some
10 indication to the contrary. Does anybody oppose
11 rescheduling of the motion?

12 MR. CARLSON: I would like to address it
13 very briefly.

14 THE COURT: Sure.

15 MR. CARLSON: The only heartburn I have with
16 rescheduling is that I specifically proposed to
17 Mr. Wilbur, when I first came on to this case, that we
18 continue the summary judgment hearing date to allow the
19 intervention to be heard first in order and then the
20 summary judgment to be heard later after intervention
21 was decided. That request for an accommodation was
22 denied, which, you know, was his right to deny, but it
23 very substantially held my feet to the fire in terms of
24 having been about a week within which to gather the
25 opposition that I filed and to do it timely.

1 So, you know, I guess I feel that
2 Mr. Skinner sort of chose to keep the existing briefing
3 schedule, which did prejudice me in terms of the amount
4 of time I had, and now is asking for the continuance
5 that I requested as an accommodation when I first
6 appeared.

7 So if there's going to be a continuance, I
8 guess the only request I would make is my briefing
9 deadline also be extended along with so I have an
10 opportunity to submit supplemental materials on a
11 briefing schedule tied to the new hearing dates. I
12 guess that would be my specific request.

13 THE COURT: I understand. Mr. Skinner.

14 MR. SKINNER: Well, that's not an accurate
15 characterization of what occurred, Your Honor. The
16 intervention did not appear to either Mr. Nye or me to
17 necessarily be a certainty that there were issues that
18 needed to be aired, and until the Court granted
19 intervention, Ms. Corliss was not a party to this
20 proceeding and shouldn't have filed any documents beyond
21 the motion for a request to intervene. And I made it
22 fairly clear that we would proceed with summary judgment
23 if she was not allowed to intervene, but it doesn't at
24 this point in time make sense for us to go forward on
25 the summary judgment matter now that we have a brand new

1 party who is officially in the case.

2 We don't have any difficulty with allowing
3 Ms. Corliss to file her responses with the regular
4 briefing schedule that applies to a summary judgment
5 hearing, and we'll set this out so there's more than 28
6 days, but until today she had no basis filing anything
7 in response to the summary judgment motion. What we
8 anticipated was that if the Court denied this motion
9 that she would be able to come in and ask for a
10 continuance of the summary judgment hearing and that
11 would have been granted. And I understand that counsel
12 for Ms. Corliss took the conservative route and didn't
13 want to run the risk of the Court not allowing that, but
14 regardless, it seems like we're spending a lot of time
15 discussing something that we all agree on.

16 The matter should be rescheduled. I will
17 reschedule it for a special-set hearing now that we know
18 there's going to be more discussion than what Mr. Nye
19 and I had previously anticipated, and I imagine that
20 will be sometime in January.

21 THE COURT: Thank you. Any comment,
22 Mr. Nye?

23 MR. NYE: No.

24 THE COURT: I will grant the continuance or
25 acknowledge that there will be a continuance of the

1 summary judgment hearing. That will need to be
2 scheduled out, as counsel notes, 28 days or more out. I
3 do allow Mr. Carlson, on behalf of Ms. Corliss, to file
4 papers beyond what he has previously filed. I can
5 understand he would take the conservative approach. I
6 certainly would have granted a continuance, but you
7 didn't know that, Counsel. So I want to give all of the
8 parties an opportunity to submit whatever materials they
9 think are appropriate within the scheduling guidelines
10 of CR 56. So the summary judgment motion will be
11 rescheduled. The parties can submit their documents.
12 This will be under the normal schedule so Mr. Carlson
13 can submit additional materials if he wishes to in
14 response to the moving papers. I think that's it.

15 MR. CARLSON: Thank you very much, Your
16 Honor.

17 THE COURT: Do you have a proposed order?

18 MR. CARLSON: I do.

19 THE COURT: Okay.

20 MR. SKINNER: Thank you, Your Honor.

21 MR. NYE: Thank you, Your Honor.

22 THE COURT: I do have the proposed order
23 granting Ms. Corliss' motion to intervene. It's been
24 approved for entry. I'm entering that.

25 MR. CARLSON: Thank you very much, Your

1 Honor.

2 (Whereupon, the proceedings in this matter
3 were concluded for the day.)

4

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C E R T I F I C A T E

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9 I, JEANNE M. WELLS, do hereby certify that
10 the foregoing verbatim report of proceedings were taken
11 by me and completed on Monday, November 17, 2014, and
12 thereafter, transcribed by me by means of computer-aided
13 transcription;

14

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17

18

That I am not a relative, employee,
attorney, or counsel of any such party to this action or
relative or employee of any such attorney or counsel,
and I am not financially interested in the said action
or the outcome thereof;

19

20

That I am herewith retaining the original
and emailing one copy to Joseph Martinez.

21

22

23

24

Jeanne M. Wells, RPR
CCR #: 2298

25

November 20, 2014