

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

WASHINGTON ELECTION INTEGRITY)	
COALITION UNITED, a Washington State)	
Nonprofit Corporation; DOUG BASLER;)	No. 2:21-cv-01394-JCC
HOWARD FERGUSON; DIANA BASS;)	
TIMOFEY SAMOYLENKO; MARY)	
HALLOWELL; SAMANTHA BUCARI;)	KING COUNTY DEFENDANTS’
RONALD STEWART; LYDIA ZIBIN;)	MOTION FOR SANCTIONS UNDER
CATHERINE DODSON,)	RULE 11
)	
)	
)	
Plaintiffs,)	
)	
v.)	<i>Noted for: December 3, 2021</i>
)	
JULIE WISE, Directory of King County)	
Elections; KING COUNTY, and DOES)	
1-30, inclusive,)	
)	
)	
Defendants.)	
)	

I. IDENTIFY OF MOVING PARTY AND RELIEF REQUESTED

Spurious and destructive allegations about election integrity attack the heart of our democracy. Making such allegations “without a valid legal basis or serious independent personal investigation into the facts [is] the height of recklessness.” *O'Rourke v. Dominion Voting Sys. Inc.*, ___ F. Supp. 3d ___, 2021 WL 3400671, at *24 (D. Colo. Aug. 3, 2021). The misuse of the courts to perpetuate groundless conspiracy theories about the 2020 election like those proffered by Plaintiffs has caused two federal courts to impose sanctions under Fed. R. Civ. P. 11. *See Id.* (sanctions awarded because election “lawsuit was filed with a woeful lack of investigation into

1 the law and (under the circumstances) the facts”); *King v. Whitmer*, __ F. Supp. 3d ___, 2021
2 WL 3771875, at *1 (E.D. Mich. Aug. 25, 2021) (imposing sanctions on plaintiff’s attorneys,
3 Sidney Powell and others, for “a historic and profound abuse of the judicial process”). Because
4 Plaintiffs have each signed and verified a complaint predicated on legal theories and factual
5 averments¹ that blatantly violate Fed. R. Civ. P. 11, Julie Wise and King County (“King County
6 Defendants”) respectfully request imposition of sanctions under Rule 11 against each Plaintiff
7 personally.

8 II. FACTS

9 Seeking to perpetuate the “Big Lie” that has recently infected American civic life,²
10 Plaintiffs’ complaint alleges that Elections Director Julie Wise and King County engaged in a
11 nefarious plot to rig the 2020 general election. Throughout their conspiracy-laden complaint,
12 Plaintiffs allege that Director Wise used “an uncertified voting system, allowing or facilitating
13

14
15 ¹ The complaint identifies certain legal claims as being brought by “Citizen Plaintiffs v.
16 Director,” while the claim under Washington’s Public Records Act (“PRA”), chapter 42.56
17 RCW is brought solely by “Plaintiff WEICU v. Director and County.” Although Plaintiff
18 WEICU does not join the legal claims raised by the individual Plaintiffs, it does specifically join
19 all factual averments made in the complaint. Dkt. 1-1 at 12 (Complaint ¶49). WEICU Director
20 Tamborine Borrelli, signed the entire complaint and personally swore to its veracity. *Id.* at 20,
21 23. WEICU attorney Virginia Shogren confirmed during the meet and confer that her client had
22 joined the factual allegations in the complaint. Dkt. ___ (Hackett Decl. ¶4). Ms. Shogren has
23 actively argued those allegations and has not filed an amended complaint since joining the case.
See Dkt. 12 (WEICU remand motion), 12-1 (Shogren declaration). As such, this motion is
brought against all Plaintiffs in this action.

² The Big Lie refers to efforts by former President Trump and others to claim that the 2020
election was stolen from him despite overwhelming evidence to the contrary. *See generally*
Zachary B. Wolf, *The 5 Key Elements of Trump’s Big Lie and How It Came to Be*, CNN (May
19, 2021) (last accessed on 10/15/2021 at <https://www.cnn.com/2021/05/19/politics/donald-trump-big-lie-explainer/index.html>); Alison Durkee, “Big Lie” Election Audits Go On After
Arizona: Here’s What’s Happening in Wisconsin, Pennsylvania-And Now Texas,” *Forbes* (Sept.
26, 2021) (Last accessed on 10/18/2021 at <https://www.forbes.com/sites/alisondurkee/2021/09/26/big-lie-election-audits-go-on-after-arizona-heres-whats-happening-in-wisconsin-pennsylvania-and-now-texas/?sh=2d4fe6132f43>).

1 vote flipping, additions and/or deletions, and allowing or facilitating party preference tracking
2 and/or ballot identification.” Dkt. 1-1 at 3 (Complaint ¶5). None of Plaintiffs assert any
3 personal knowledge in support of the complaint’s rash allegations. Instead, they assert that that
4 they “are informed and believe and thereon allege” *E.g., id.* at ¶¶ 14, 15, 18, 25, 26, 34.

5 Despite a lack of any personal knowledge or other competent proof, Plaintiffs directly
6 accuse Director Wise of serious malfeasance, if not criminal offenses:

- 7 • “Plaintiffs are further informed and believe and thereon allege, that in November
8 2020, Director personally certified the County’s tabulation results generated by
9 Uncertified Voting System for the Election, and that such act was in further error
10 or neglect under state and federal law.” *Id.* at ¶15.
- 11 • “Plaintiffs are informed and believe and thereon allege, that Director engaged in
12 wrongful acts, errors and/or neglect of duty by allowing and/or facilitating
13 electronic manipulation of the voting results from the Election.” *Id.* at ¶25
- 14 • “Plaintiffs are informed and believe and thereon allege, based on official
15 electronic tallies recorded and electronically reported and captured in real time,
16 that approximately 6,000 votes were flipped, over 400,000 votes were added,
17 and/or thousands of votes were removed in one or more state-wide races before,
18 during, and/or after the Election. *Plaintiffs are informed and believe and thereon*
19 *allege, that a portion of the state-wide vote flipping, additions and/or deletions*
20 *occurred in the County’s Election overseen by Director.” Id.* at ¶26 (emphasis
21 added).
- 22 • “Plaintiffs are informed and believe and thereon allege, that Director engaged in
23 wrongful acts, errors and/or neglect of duty by allowing and/or facilitating: 1)

1 maintaining a record of County elector party preference in violation of RCW
2 29A.08.166; and/or 2) identifying ballots cast by County electors in the Election
3 by Party preference.” *Id.* at ¶34.

- 4 • “Plaintiffs are informed and believe and thereon allege, that Director engaged in
5 wrongful acts, errors, and/or neglect of duty by allowing and/or facilitating
6 loosely connected zip ties on ballot collection and/or storage boxes preventing a
7 secure chain of custody and allowing, *inter alia*, space for insertion and/or
8 removal of original ballots.” *Id.* at ¶ 42.

9 Based on these allegations, Plaintiffs seek damages and injunctive relief on various federal and
10 state constitutional theories, as well as damages under 42 U.S.C. §1983.

11 Plaintiffs essentially admit that they chose to file their complaint without evidence to
12 support their allegations even though such evidence might very well refute their claims:

13 Plaintiff WEICU issued a records request for ballots ***to confirm or deny*** the
14 conduct and seeks a Court order compelling release of the public records, including a
15 Court order unsealing ballots under RCW 29A.60.110, for a full forensic audit conducted
16 by Jovan Hutton Pulitzer, inventor of kinematic artifact detection and Maricopa County
17 Arizona ballot auditor of approximately 2.1 million ballots.

18 Dkt. 1-1 at 3 (Complaint ¶5; emphasis added). In later portions of their complaint, Plaintiffs aver
19 that they have not received these ballots (*Id.* at 12-13 (Complaint ¶¶50-55), but apparently opted
20 to file the lawsuit anyway.

21 Likewise, all Plaintiffs decided to verify their complaint under penalty of perjury. Each
22 Plaintiff has filed the same verification form, which plainly indicates the limits of their
23 knowledge and the inadequacy of their inquiry despite the serious circumstances of this case.
Importantly, they admit that they have no personal knowledge apart from what they have been
told: “I am informed and believe that the matters stated [in the complaint] are true and correct

1 and on that ground I allege that the matters stated therein are true.” *Id.* (Complaint at pp. 22-27).
2 In essence, Plaintiffs swear to the allegations in the complaint merely because someone told
3 them that the allegations were true and they believed that person.

4 On November 15, 2021, Defendants scheduled and participated in a meet and confer
5 videoconference with Plaintiffs before filing this motion. Dkt. ___ (Hackett Decl. ¶3). In accord
6 with the 21-day “safe harbor” provision in Rule 11(c), King County Defendants provided an
7 advance copy of this Rule 11 motion by mail to Plaintiffs on October 22, 2021. *Id.* at ¶2. One
8 Plaintiff, Amy Behope, dismissed her claims by stipulation, but the remaining Plaintiffs have
9 opted to continue with this matter and not amend any legal claims or factual averments in the
10 complaint.

11 III. ISSUES

12 Should this Court impose sanctions against each Plaintiff personally under Rule 11 for
13 the non-PRA claims in the complaint when each plaintiff signed and verified the complaint in
14 violation of Rule 11(b)?³

15 IV. LEGAL ARGUMENT

16 A. **RULE 11 APPLIES TO PRO SE PARTIES.**

17 By its terms, Rule 11 applies to both attorneys and “unrepresented parties” who sign and
18 file pleadings and other papers with the court. Fed. R. Civ. P. 11(b). As such, courts have
19 applied Rule 11 “to *pro se* plaintiffs in assessing both the reasonableness of the behavior and the
20 appropriate measure of sanctions.” *Warren v. Guelker*, 29 F.3d 1386, 1390 (9th Cir. 1994). *See*

21
22
23 ³ To be clear, the King County Defendants do not seek sanctions arising from Plaintiff WEICU’s
PRA claims. Although incorrect as a matter of law, the PRA claims do not meet the Rule 11
standards of legal frivolity. WEICU’s violation of the rule is solely the result of incorporating
the factual claims in the complaint that are unrelated to the PRA claim.

1 also *W.V. ex rel. N.V. v. Encinitas Union Sch. Dist.*, 289 F.R.D. 308, 312 (S.D. Cal. 2012) (pro se
2 litigants subject to sanctions). Application of Rule 11 sanctions to pro se plaintiffs is especially
3 appropriate in cases that advance election conspiracy claims in order to prevent pro se plaintiffs
4 from operating as “cat’s paws” for unscrupulous attorneys.⁴

5 When signing a pleading, a person “certifies that to the best of the person's knowledge,
6 information, and belief, *formed after an inquiry reasonable under the circumstances*” that:

- 7 (1) it is not being presented for any improper purpose, such as to harass, cause
unnecessary delay, or needlessly increase the cost of litigation;
8 (2) *the claims, defenses, and other legal contentions are warranted by existing
law or by a nonfrivolous argument for extending, modifying, or reversing existing law or
9 for establishing new law;*
10 (3) *the factual contentions have evidentiary support or, if specifically so
identified, will likely have evidentiary support after a reasonable opportunity for further
investigation or discovery;* and
11 (4) the denials of factual contentions are warranted on the evidence or, if
specifically so identified, are reasonably based on belief or a lack of information.

12 *Id.* (emphasis added). Each person who signs a complaint has a “personal, nondelegatable
13 responsibility’ to comply with the requirements of Rule 11 before signing a
14 complaint.” *O’Rourke*, 2021 WL 3400671, at *11 (*quoting Pavelic & LeFlore v. Marvel
15 Entertainment Group*, 493 U.S. 120, 127, 110 S.Ct. 456, 107 L.Ed.2d 438 (1989)).

16 If a person signs and files a pleading in violation of Rule 11, “the court may impose an
17 appropriate sanction on any . . . party that violated the rule or is responsible for the violation.”
18 Rule 11(c)(1). However, Rule 11 provides the opportunity for an offending party to correct their
19 error without facing a sanction. In accord with Rule 11(c) “safe harbor” provisions, King
20

21 _____
22 ⁴ Attorneys who have advanced similar complaints in court have faced disciplinary proceedings.
23 For example, attorney Rudolph Giuliani has been suspended from the practice of law in New
York state for communicating “demonstrably false and misleading statements to courts,
lawmakers and the public at large in his capacity as a lawyer . . . in connection with [former
President] Trump’s failed effort at reelection in 2020.” *In re the matter of Giuliani*, No. 2021-
00506 at p. 2 (N.Y App. Div. May 3, 2021).

1 County Defendants served each Plaintiff with an advance copy of this motion and waited 21 days
2 before filing the motion with the court. Dkt. ____ (Decl. of Hackett ¶2). Each Plaintiff had the
3 opportunity to avoid sanctions by bringing themselves into compliance with Rule 11.⁵ See
4 *Sneller v. City of Bainbridge Island*, 606 F.3d 636, 638–39 (9th Cir. 2010) (“Rule 11 sanctions
5 may not be imposed if the challenged claim is withdrawn within 21 days after service of the
6 sanctions motion.”).

7 The Ninth Circuit has explained the test for determining when a *complaint* is filed in
8 violation of Rule 11:

9 When, as here, a “complaint is the primary focus of Rule 11 proceedings, a
10 district court must conduct a two-prong inquiry to determine (1) whether the complaint is
11 legally or factually baseless from an objective perspective, and (2) if the attorney has
12 conducted a reasonable and competent inquiry before signing and filing it.” *Christian v.*
13 *Mattel, Inc.*, 286 F.3d 1118, 1127 (9th Cir.2002) (internal quotations and citation
14 omitted). As shorthand for this test, we use the word “frivolous” “to denote a filing that
15 is *both* baseless *and* made without a reasonable and competent inquiry.” *Moore v.*
16 *Keegan Mgmt. Co (In re Keegan Mgmt. Co., Sec. Litig.)*, 78 F.3d 431, 434 (9th Cir.1996).
17 *Holgate v. Baldwin*, 425 F.3d 671, 675–76 (9th Cir. 2005). Rule 11 sanctions are governed by
18 “an objective standard of reasonable inquiry.” *de Borja v. Razon*, 336 F.R.D. 620, 631 (D. Or.
19 2020). “Not all of a complaint’s claims must be frivolous for Rule 11 sanctions to be
20 appropriate.” *Chao v. Westside Drywall, Inc.*, 709 F. Supp. 2d 1037, 1080 (D. Or. 2010). Here,
21 Plaintiff’s complaint violates this standard.

19 **B. THE INDIVIDUAL PLAINTIFFS HAVE VIOLATED RULE 11 BECAUSE THEY
20 HAVE NO COLORABLE LEGAL BASIS FOR STANDING.**

20 The legal claims raised by individual Plaintiffs are baseless. They filed their claims
21 despite substantial authority that they lack standing. Any reasonable and competent Plaintiffs’
22

23 ⁵ The Court also has authority to sanction both litigants and attorneys under its inherent power.
de Borja v. Razon, 336 F.R.D. 620, 631 (D. Or. 2020).

1 inquiry should have revealed this authority. Even a cursory review of similar election conspiracy
2 cases quickly demonstrates that the claims presented in this case fail for lack of standing. As
3 pointed out in *O'Rourke* – a case that was available when Plaintiffs filed their complaint - “[t]he
4 most patent deficiency in Plaintiffs’ wide-ranging, scatter-shot Complaint was the individual
5 Plaintiffs’ lack of standing.” 2021 WL 3400671, at *6–7. *Accord King v. Whitmer*, 2021 WL
6 3771875, at *20 (plaintiffs’ claims barred by standing). Indeed, a ““veritable tsunami’ of adverse
7 precedent” precludes the individual Plaintiffs’ standing to bring their complaint, which raises
8 only generalized complaints about the 2020 general election that are equally applicable to every
9 registered voter and impacted individual Plaintiffs in the same way. *O'Rourke*, 2021 WL
10 3400671, at *8. Because individual Plaintiffs can claim no individualized injury different from
11 other voters, their complaint is legally deficient under Rule 11 for lack of standing and their lack
12 of any reasonable inquiry into the law merits sanctions.

13 **C. ALL PLAINTIFFS FAILED TO MAKE AN ADEQUATE FACTUAL INQUIRY**

14 Similarly, Plaintiffs’ complaint is factually baseless and unsupported by any reasonable
15 and competent inquiry into facts. Under Rule 11, a plaintiff is required to make an inquiry into
16 the factual basis of a complaint that is “reasonable under the circumstances.” As pointed out in
17 *O'Rourke*, a person making a reasonable inquiry into the facts should have been on notice that
18 generalized allegations of election rigging and fraud are suspect:

19 Plaintiffs’ counsel should have been on notice as to the serious, publicly reported doubts
20 as to the validity of election-rigging or election fraud allegations, and the associated
21 importance of conducting extensive, objective, and independent due diligence before
22 filing. Given the circumstances of this case, it was not enough to merely accept as true (or
23 potentially true) what might be stated in the media, what had been pushed out over the
Internet, or even what was included in other lawsuits filed around the country. *Some
effort at independent verification by the lawyers who signed the Complaint was required.*

1 2021 WL 3400671, at *15 (emphasis added). The “circumstances” surrounding conspiratorial
2 allegations toward the officials who conducted the 2020 general election involve a former
3 President who refused to concede an election that he lost, who actively worked with his allies to
4 undermine American democracy in order to disrupt and challenge future elections, and who
5 incited an insurrection at the Capitol. *Id.* at *22

6 These circumstances require a heightened degree of due diligence before alleging the
7 misconduct of election officials regarding a long-certified election: “Given the volatile political
8 atmosphere and highly disputed contentions surrounding the election both before and after
9 January 6, 2021, *circumstances mandated that Plaintiffs’ counsel perform heightened due*
10 *diligence, research, and investigation before repeating in publicly filed documents the*
11 *inflammatory, indisputably damaging, and potentially violence-provoking assertions about the*
12 *election having been rigged or stolen.” *Id.* at *23 (emphasis added). Plaintiffs, who
13 affirmatively chose to wade into these murky and fetid waters, failed a normal inquiry into the
14 facts, much less the heightened one that was reasonable and competent under the circumstances.
15 *See generally* Lewis and Sparks, *In Defense of the Foundation Stone: Deterring Post-Election*
16 *Abuse of the Legal Process*, 55 Ga L. Rev. 1649 (Summer 2021) (“Rule 11 sanctions, statutory
17 remedies, and other consequences must be employed when litigants baselessly challenge election
18 results, or the courts will find themselves regularly enlisted in efforts to confer false legitimacy
19 on misinformation campaigns.”).*

20 **1. Contrary to Rule 11, Plaintiffs Admit that they Lack Any Personal**
21 **Knowledge of Their Allegations.**

22 As noted above, Plaintiffs’ sworn verifications disavow any personal knowledge and
23 instead rely on what some unspecified and unnamed persons have told them. This is consistent
with the averments in the complaint, which similarly claim no instances of personal knowledge

1 by any Plaintiff. Without personal knowledge or any investigation into actual facts, Plaintiffs’
2 allegations amount to nothing more than rumor and innuendo. *See O’Rourke*, 2021 WL
3 3400671, at *28 (“Affidavits from one hundred fifty new plaintiffs who lacked personal
4 knowledge of any election fraud or conspiracy between Defendants, and who suffered no
5 particularized injury, added nothing to the lawsuit.”). An objectively reasonable factual inquiry
6 under Rule 11 requires far more than simply being told something by someone and believing that
7 it’s true.

8 **2. Rule 11 Does Not Allow a Plaintiff to Proceed on Their “Beliefs” Alone.**

9 Both in the complaint and in their verifications, Plaintiffs acknowledge that the
10 allegations in the complaint merely constitute their personal “beliefs.” However, “an ‘empty-
11 head’ but ‘pure-heart’ does not justify lodging patently unsupported factual assertions.” *King v.*
12 *Whitmer, supra*, 2021 WL 3771875 at *24. Plaintiffs have undertaken no factual inquiry, much
13 less a reasonable one. As a result, they should be sanctioned for filing a complaint in violation of
14 Rule 11. *See In re Kunstler*, 914 F.2d 505, 515–16 (4th Cir. 1990) (representing allegations in a
15 complaint as “beliefs” does not avoid Rule 11 sanctions.).

16 **3. Plaintiffs Violated Rule 11 By Filing a Complaint Where Factual Allegations**
17 **Are Based on a Planned Future Review of Ballots That is Foreclosed by**
Binding Precedent.

18 In their complaint, Plaintiffs freely admit that *they cannot prove their core allegations of*
19 *election fraud without access to the ballots* from the 2020 election. Dkt. 1-1 at 3 (Complaint at
20 ¶5). They cite non-Washington law to claim that the ballots “are public records and subject to
21 inspection.” *Id.* at ¶55. However, binding Washington precedent completely forecloses
22 Plaintiffs’ access to the ballots and their so-called “audit.”⁶ Tabulated ballots are not subject to
23

⁶ Subject to strict time limits, Washington law allows orderly challenges to election results. For

1 public disclosure under the PRA. *White v. Clark Cty.*, 199 Wash. App. 929, 934, 401 P.3d 375,
2 378 (2017), *rev. denied* 189 Wn.2d 1031 (2018). Because *White* is controlling law, Plaintiffs’
3 decision to make wild allegations of election fraud by Director Wise that they can only prove or
4 disprove with ballots that are unavailable to them is objectively unreasonable. *See In re*
5 *Kunstler*, 914 F.2d 505, 516 (4th Cir. 1990) (“The need for discovery to complete the factual
6 basis for alleged claims is not an excuse to allege claims with no factual basis.”).

7 **V. CONCLUSION**

8 Plaintiffs’ complaint alleging serious misconduct in the conduct of the 2020 general
9 election violates the requirements of Rule 11. This court should follow District Judges in
10 Colorado and Michigan by sanctioning this behavior. Plaintiffs should be held jointly and
11 severally liable for attorney fees and costs incurred by King County in this matter in defending
12 against Plaintiffs’ non-PRA claims.

13 DATED this 18th day of November, 2021.

14 DANIEL T. SATTERBERG
15 King County Prosecuting Attorney

16 By: s/ David Hackett
17 ANN SUMMERS, WSBA #21509
18 DAVID J. HACKETT, WSBA #21236
19 Senior Deputy Prosecuting Attorney
20 Attorneys for Defendants
1191 Second Avenue, Suite 1700
Seattle, WA 98101
Phone: (206) 296-0430/Fax: (206) 296-8819
david.hackett@kingcounty.gov

21 _____
22 example, a recount under statutory procedures may be requested within two business days after
23 the county canvassing board has declared the official results of an election. RCW 29A.64.011.
No later than 10 days following election certification, an elector may contest an election by
initiating a court proceeding by affidavit and claiming a wrongful act, neglect or error by
elections officials. RCW 29A.68.013. Plaintiffs’ request for their own “audit” falls well outside
these statutory procedures and statutory limitations periods.

1 **CERTIFICATE OF SERVICE**

2 I hereby certify that on November 18, 2021, I electronically filed the foregoing document
3 with the Clerk of the Court using the CM/ECF E-filing system which will send notification of
4 such filing to the following:

5
6 Virginia P. Shogren
7 Virginia P. Shogren, P.C.
8 961 W. Oak Court
9 Sequim, WA 98382
10 vshogren@gmail.com
11 WEiCUattorney@protonmail.com
12 Counsel for Washington Election Integrity Coalition United

13
14 Kevin J. Hamilton, WSBA No. 15648
15 Amanda J. Beane, WSBA No. 33070
16 Reina A. Almon-Griffin, WSBA No. 54651
17 Nitika Arora, WSBA No. 54084
18 Perkins Coie LLP
19 1201 Third Avenue, Suite 4900
20 Seattle, WA 98101-3099
21 KHamilton@perkinscoie.com
22 ABeane@perkinscoie.com
23 RAlmon-Griffin@perkinscoie.com
NArora@perkinscoie.com

Attorneys for Intervenor Washington State Democratic Central Committee

16 And I hereby certify that I sent a copy of the document via US Postal service to the
17 following:

18 Doug Basler
19 Plaintiff, Pro Se
20 1851 Central Place S. Suite 123
21 Kent, WA 98032

22 Howard Ferguson
23 Plaintiff, Pro Se
4537 13th Avenue S
Seattle, WA 98108

1 Diana Bass
2 Plaintiff, Pro Se
3 PO Box 7364
4 Bellevue, WA 98008

5 Timofey Samoylenko
6 Plaintiff, Pro Se
7 1921 R. Street NE
8 Auburn, WA 98002

9 Mary Hallowell
10 Plaintiff, Pro Se
11 17505 462nd Avenue SE
12 North Bend, WA 98045

13 Samantha Bucari
14 Plaintiff, Pro Se
15 3546 S. 244th Street
16 Kent, WA 98032
17 sbucari2108@gmail.com

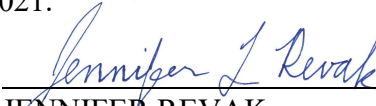
18 Ronald Stewart
19 Plaintiff, Pro Se
20 29506 51st Avenue South
21 Auburn, WA 98001

22 Lydia Zibin
23 Plaintiff, Pro Se
24 254 145th Place SE
25 Bellevue, WA 98007

26 Catherine Dodson
27 Plaintiff, Pro Se
28 42131 212th Avenue SE
29 Enumclaw, WA 98022

30 I declare under penalty of perjury under the laws of the United States and the State of
31 Washington that the foregoing is true and correct.

32 DATED this 18th day of November, 2021.

33 
JENNIFER REVAK
Legal Assistant – Litigation Section
King County Prosecuting Attorney's Office