

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26

The Honorable Robert J. Bryan

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE**

Brian P. Carr,

Plaintiff,

v.

Sam Reed, in his official capacity as
Secretary of the State of Washington,
Wanda Briggs in her official capacity as
Chair of the State of Washington
Commission of Judicial Conduct, and Rob
McKenna, in his official capacity as
Attorney General of the State of
Washington and, separately, as private
individuals the Honorable Robert L.
Harris, John F. Nichols, Barbara D.
Johnson, Kenneth Eisland, Rich Melnick,
John Hagensen, Kelli E. Osler, Joel
Penoyar, (J.)C.C. Bridgewater, J. Robin
Hunt, Gerry L. Alexander, Barbara
Madsen, Mary E. Fairhurst, Susan Owens
and James M. Johnson as well as other
currently unnamed parties as determined
by the Court,

Defendants.

NO. C07-5260RJB

DECLARATION OF WILLIAM G.
CLARK

I, WILLIAM G. CLARK, declare as follows:

1 1. I am one of the attorneys representing defendants Reed, McKenna, Penoyar,
2 Bridgewater, Hunt, Alexander, Madsen, Fairhurst, Owens and Johnson (“the State
3 Defendants”) and testify to the matters herein based on my personal knowledge.

4 2. Attached to this Declaration are true and correct copies of the following:

5 **Exhibit A** First Amended Complaint in *Carr v. Reed, et al.*, USDC-Seattle
6 No. C07-5260RJB (pp. 4-29)

7 **Exhibit B** Plaintiff’s Initial Disclosures in *Carr v. Reed, et al.*, USDC-Seattle
8 No. C07-5260RJB (pp. 30-32)

9 **Exhibit C** Appellant’s Brief, *Carr v. Karyn*, Court of Appeals, Division II
10 No. 32671-0-II (pp. 33-54)

11 **Exhibit D** Unpublished Opinion, *Carr v. Karyn*, Court of Appeals, Division II
12 No. 32671-0-II/32811-9-II (pp. 55-62)

13 **Exhibit E** Order, *Carr v. Karyn*, Supreme Court of Washington, No. 78768-9
14 (p. 63)

15 These documents were obtained from court files and from documents maintained and available
16 on plaintiff’s website.

17 WILLIAM G. CLARK declares under penalty of perjury of the laws of the state of
18 Washington that the foregoing is true and correct.

19 DATED this 30th day of August, 2007.

20
21 ROB MCKENNA
22 Attorney General

23 ss/William G. Clark
24 WILLIAM G. CLARK, WSBA #9234
25 Assistant Attorney General
26 Office of the Attorney General
800 Fifth Avenue, Suite 2000
Seattle, WA 98104-3188
Telephone: (206) 389-2794
Facsimile: (206) 587-4229
e-mail: billc2@atg.wa.gov
Attorneys for State Defendants

CERTIFICATE OF SERVICE

I hereby certify that on this 30th day of August, 2007, I electronically filed the foregoing **Declaration of William G. Clark** with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following CM/ECF participants:

Bernard Veljacic
Clark County Prosecutor
Bernard.Veljacic@clark.wa.gov

Brian P. Carr
brian@brian.carr.name

ROBERT M. MCKENNA
Attorney General

/s/ William G. Clark
WILLIAM G. CLARK, WSBA # 9234
Attorney General of Washington
800 Fifth Avenue, Suite 2000
Seattle, WA 98104-3188
Telephone: (206) 464-7352
Facsimile: (206) 587-4229
E-Mail: BillC2@atg.wa.gov
Attorneys for State Defendants