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7 IN THE SUPERIOR COURT FOR THE STATE OF WASHINGTON  
IN AND FOR THE COUNTY OF KING

8 STACY IRWIN and KIMBERLY FERREIRO,

9 Plaintiffs,

10 v.

11 CITY OF SEATTLE, WASHINGTON, a  
12 municipal corporation under the laws of the State  
13 of Washington,

14 Defendant.

KING COUNTY SUPERIOR  
COURT NO. 21-2-11739-9 SEA

COURT OF APPEALS NO.  
84843-7-I

**PLAINTIFFS' SECOND AMENDED  
NOTICE OF DISCRETIONARY  
REVIEW TO THE COURT OF  
APPEALS, DIVISION I**

15  
16 On January 3, 2023, Plaintiffs Stacy Irwin and Kimberly Ferreiro (hereinafter "Plaintiffs")  
17 sought review by the Court of Appeals, Division I, of the King County Superior Court's Revised  
18 and Updated Order Granting City of Seattle's Motion for Privilege Determination entered  
19 November 16, 2022 and Order Denying Plaintiffs' Motion to Reconsider Determination of Privilege  
20 entered December 2, 2022. On January 12, 2023, Plaintiffs filed an Amended Notice of  
21 Discretionary Review of the King County Superior Court's Order Denying Plaintiffs' Revised  
22 Motion to Compel Discovery and for an *In Camera* Review and the Appointment of a Special  
23 Master entered January 6, 2023.

24 Pursuant to RAP 5.3 (h)(ii), Plaintiffs again amend their Notice of Discretionary Review to  
25 include the King County Superior Court's Order Granting City of Seattle's Motion to Compel  
26 Deposition of Plaintiff Kimberly Ferreiro entered January 6, 2023. Copies of said orders are

1 attached hereto.  
2

3 DATED this 17th day of January 2023.

4 By: /s/ Susan B. Mindenbergs  
5 Susan B. Mindenbergs, WSBA #20545  
6 Law Office of Susan B. Mindenbergs  
7 705 Second Avenue, Suite 1050  
8 Seattle, WA 98104  
9 Telephone: (206) 447-1560  
10 Facsimile: (206) 447-1523  
11 Email: susanmm@msn.com

12 By: /s/ Jeffrey L. Needle  
13 Jeffrey L. Needle, WSBA #6346  
14 Law Office of Jeffrey L. Needle  
15 705 Second Avenue, Suite 1050  
16 Seattle, WA 98104  
17 Telephone: (206) 447-1560  
18 Facsimile: (206) 447-1523  
19 Email: jneedle@jneedlelaw.com  
20 *Attorneys for Plaintiffs*

1 **CERTIFICATE OF SERVICE**

2 I hereby certify that on January 17, 2023, the undersigned caused a true and correct copy of  
3 the foregoing document to be served in the manner indicated below upon the following  
4 individual(s):

5 James P. Savitt, WSBA #16847  
6 Brandi B. Balanda, WSBA #48836  
7 Sarah Gohmann Bigelow, WSBA #43634  
8 SAVITT BRUCE & WILLEY LLP  
9 1425 Fourth Avenue, Suite 800  
10 Seattle, WA 98101-2272  
11 Telephone: (206) 749-0500  
12 Facsimile: (206) 749-0600  
13 Email: [jsavitt@sbwllp.com](mailto:jsavitt@sbwllp.com)  
14 Email: [bbalanda@sbwllp.com](mailto:bbalanda@sbwllp.com)  
15 Email: [sgohmannbigelow@sbwllp.com](mailto:sgohmannbigelow@sbwllp.com)  
16 *Attorneys for Defendant*

- Legal Messenger
- Facsimile
- Electronic Mail
- USPS First Class Mail
- UPS Shipping
- Court eFiling/eService

17 The foregoing statement is made under the penalty of perjury under the laws of the State of  
18 Washington and is true and correct.

19 DATED this 17th day of January 2023.

20 By: /s/ Christine A. Tobin  
21 Christine A. Tobin, *Paralegal*  
22 Law Office of Susan B. Mindenbergs  
23 705 Second Avenue, Suite 1050  
24 Seattle, WA 98104  
25 Telephone: (206) 447-1560  
26 Facsimile: (206) 447-1523  
Email: [christine@sbmlaw.net](mailto:christine@sbmlaw.net)

SUPERIOR COURT FOR THE STATE OF WASHINGTON  
IN AND FOR THE COUNTY OF KING

STACY IRWIN and KIMBERLY FERREIRO,

Plaintiffs,

v.

CITY OF SEATTLE, a municipal corporation  
under the laws of the State of Washington,

Defendant.

NO. 21-2-11739-9 SEA

**REVISED AND UPDATED ORDER  
GRANTING CITY OF SEATTLE'S  
MOTION FOR PRIVILEGE  
DETERMINATION**

THIS MATTER came before the Court on Defendant City of Seattle's Motion for Privilege Determination (the "Motion"), and the Court having considered:

- (a) The Pleadings and files in this matter;
- (b) The Motion;
- (c) The Documents submitted *in-camera*;
- (d) Declaration of Brandi Balanda in Support of the Motion and exhibits thereto;
- (e) Declaration of Joseph Groshong in Support of the Motion;
- (f) Plaintiffs' Opposition to the Motion;
- (g) Declaration of Jeffrey Needle in Opposition to Motion to Determine Privilege with exhibits;
- (h) Defendant's Reply; and

1 (i) having considered oral argument on August 31, 2022;  
2 and having been familiar with the files and records in this case is fully advised.

3 NOW, THEREFORE, the Motion is **GRANTED** in part as follows:

4 1. For the following Documents, the City's asserted attorney-client and/or work  
5 product privilege is sustained:

- 6 a. COS\_00007164-COS\_00007176 (IRWIN\_0000659-IRWIN\_0000671);
- 7 b. COS\_00007180 (IRWIN\_0000725);
- 8 c. COS\_00007046-COS\_00007047 (FERREIRO\_000094-  
9 FERREIRO\_000095);
- 10 d. COS\_00007048-COS\_00007050 (FERREIRO\_000099-  
11 FERREIRO\_0000101);
- 12 e. COS\_00007052 (FERREIRO\_0000105);
- 13 f. COS\_00007117 (IRWIN\_0000269);
- 14 g. COS\_00007141-COS\_00007143 (IRWIN\_0000329-IRWIN\_0000331);
- 15 h. COS\_00007154-COS\_00007156 (IRWIN\_0000377-IRWIN\_0000379);
- 16 i. COS\_00007039-COS\_00007040 (FERREIRO\_000085-  
17 FERREIRO\_000086);
- 18 j. COS\_00007051 (FERREIRO\_0000104);
- 19 k. COS\_00007070-COS\_00007071 (FERREIRO\_0000238-  
20 FERREIRO\_0000239);
- 21 l. COS\_00007032-COS\_00007034 (FERREIRO\_000078-  
22 FERREIRO\_000080);
- 23 m. COS\_00007053-COS\_00007054 (FERREIRO\_0000108-  
24 FERREIRO\_0000109);
- 25 n. COS\_00007055-COS\_00007056 (FERREIRO\_0000116-  
26 FERREIRO\_0000117);

- 1 o. COS\_00007072-COS\_00007073 (FERREIRO\_0000240-  
2 FERREIRO\_0000241);
- 3 p. COS\_00007118-COS\_00007119 (IRWIN\_0000273-IRWIN\_0000274);
- 4 q. COS\_00007120 (IRWIN\_0000275);
- 5 r. COS\_00007121-COS\_00007124 (IRWIN\_0000276-IRWIN\_0000279);
- 6 s. COS\_00007125-COS\_00007128 (IRWIN\_0000280-IRWIN\_0000283);
- 7 t. COS\_00007133-COS\_00007135 (IRWIN\_0000297-IRWIN\_0000299);
- 8 u. COS\_00007139-COS\_00007140 (IRWIN\_0000326-IRWIN\_0000327);
- 9 v. COS\_00007144-COS\_00007146 (IRWIN\_0000332-IRWIN\_0000334);
- 10 w. COS\_00007147 (IRWIN\_0000335);
- 11 x. COS\_00007148-COS\_00007149 (IRWIN\_0000350-IRWIN\_0000351);
- 12 y. COS\_00007150-COS\_00007153 (IRWIN\_0000373-IRWIN\_0000376);
- 13 z. COS\_00007157-COS\_00007159 (IRWIN\_0000384-IRWIN\_0000386);
- 14 aa. COS\_00007029 (FERREIRO\_000045);
- 15 bb. COS\_00007030-COS\_00007031 (FERREIRO\_000046-  
16 FERREIRO\_000047);
- 17 cc. COS\_00007038 (FERREIRO\_000084);
- 18 dd. COS\_00007041-COS\_00007042 (FERREIRO\_000089-  
19 FERREIRO\_000090);
- 20 ee. COS\_00007043 (FERREIRO\_000091);
- 21 ff. COS\_00007044 (FERREIRO\_000092);
- 22 gg. COS\_00007045 (FERREIRO\_000093);
- 23 hh. COS\_00007066 (FERREIRO\_0000232);
- 24 ii. COS\_00007067-COS\_00007068 (FERREIRO\_0000233-  
25 FERREIRO\_0000234);
- 26 jj. COS\_00007069 (FERREIRO\_0000235);
- 27 kk. COS\_00007109 (IRWIN\_0000261);

1 ll. COS\_00007110-COS\_00007111 (IRWIN\_0000262-IRWIN\_0000263);  
2 mm. COS\_00007112 (IRWIN\_0000264);  
3 nn. COS\_00007113-COS\_00007114 (IRWIN\_0000265-IRWIN\_0000266);  
4 oo. COS\_00007058-COS\_00007061 (FERREIRO\_0000205-  
5 FERREIRO\_0000208);  
6 pp. COS\_00007077-COS\_00007080 (FERREIRO\_0000247-  
7 FERREIRO\_0000250);  
8 qq. COS\_00007092-COS\_00007093 (IRWIN\_0000149-IRWIN\_0000150);  
9 rr. COS\_00007094 (IRWIN\_0000163);  
10 ss. COS\_00007115-COS\_00007116 (IRWIN\_0000267-IRWIN\_0000268);  
11 tt. COS\_00007095-COS\_00007096 (IRWIN\_0000173-IRWIN\_0000174);  
12 uu. COS\_00007107-COS\_00007108 (IRWIN\_0000187-IRWIN\_0000188);  
13 vv. COS\_00007181-COS\_00007184 (IRWIN\_0000734-IRWIN\_0000737);  
14 ww. COS\_00007185-COS\_00007189 (IRWIN\_0000738-IRWIN\_0000742);  
15 xx. COS\_00007100-COS\_00007106 (IRWIN\_0000180-IRWIN\_0000186);  
16 yy. COS\_00007090 (IRWIN\_0000141);  
17 zz. COS\_00007130 (IRWIN\_0000294);  
18 aaa. COS\_00007131 (IRWIN\_0000295).

19 2. For the following Documents, the City's asserted attorney-client and/or work  
20 product privilege is overruled:

21 a. COS\_00007160-COS\_00007163 (IRWIN\_0000602-IRWIN\_0000605);  
22 b. COS\_00007035-COS\_00007037 (FERREIRO\_000081-  
23 FERREIRO\_000083);  
24 c. COS\_00007074-COS\_00007076 (FERREIRO\_0000242-  
25 FERREIRO\_0000244).

26 3. For the following Documents, the City's asserted attorney-client and/or work  
27 product privilege is sustained in part:

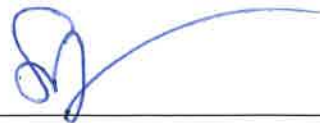
- 1 a. COS\_00007062-COS\_00007065 (FERREIRO\_0000220-  
2 FERREIRO\_0000223): The asserted privilege on COS\_00007062 is  
3 overruled; the asserted privilege on COS\_00007064 and COS\_00007065 is  
4 sustained.
- 5 b. COS\_00007097-COS\_00007099 (IRWIN\_0000177-IRWIN\_0000179): On  
6 Irwin 0000177, the first asserted privilege is sustained. The second which  
7 begins with “pretty soon ...” is not privileged. The blue highlighted privilege  
8 on Irwin 0000178 is sustained.

9 4. Plaintiffs shall not disclose or use any of the information ruled by this Court to  
10 be the City’s privileged attorney-client information and/or protected work product (collectively,  
11 the “Privileged Information”) in any way.

12 5. Plaintiffs shall destroy any and all documents, whether electronic or hard copy,  
13 that contain any portion of the Privileged Information within ten business days of entry of this  
14 Court’s November 1, 2022 Preliminary Order Granting City of Seattle’s Motion for Privilege  
15 Determination and shall confirm their compliance in writing to the City.

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18 **IT IS SO ORDERED.**

19 DATED this 16<sup>th</sup> day of November, 2022.

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The Honorable Suzanne R. Parisien



1 PRESENTED BY:

2 **SAVITT BRUCE & WILLEY LLP**

3  
4 By: s/ James P. Savitt

5 James P. Savitt, WSBA #16847

6 Sarah Gohmann Bigelow, WSBA #43634

7 1425 Fourth Avenue Suite 800

8 Seattle, Washington 98101-2272

9 Telephone: 206.749.0500

Facsimile: 206.749.0600

Email: [jsavitt@sbwLLP.com](mailto:jsavitt@sbwLLP.com)

Email: [sgohmannbigelow@sbwLLP.com](mailto:sgohmannbigelow@sbwLLP.com)

10 *Attorneys for Defendant City of Seattle*

1 **CERTIFICATE OF SERVICE**

2 I hereby declare under penalty of perjury under the laws of the State of Washington that  
3 on this date, I caused a true and correct copy of the foregoing document to be served on the  
4 following in the manner(s) indicated:

5 Susan B. Mindenbergs, WSBA #20545  
6 Law Office of Susan B. Mindenbergs  
7 705 Second Avenue, Suite 1050  
8 Seattle, WA 98104  
9 Telephone: (206) 447-1560  
10 Facsimile: (206) 447-1523  
11 Email: [susanmm@msn.com](mailto:susanmm@msn.com)

- Via E-Filing
- Via Legal Messenger
- Via Email
- Via U.S. Mail
- Via Fax

12 *Attorney for Plaintiffs*

13 Jeffrey L. Needle, WSBA #6346  
14 Law Office of Jeffrey L. Needle  
15 705 Second Avenue, Suite 1050  
16 Seattle, WA 98104  
17 Telephone: (206) 447-1560  
18 Facsimile: (206) 447-1523  
19 Email: [jneedle@wolfenet.com](mailto:jneedle@wolfenet.com)  
20 [jneedle@jneedlelaw.com](mailto:jneedle@jneedlelaw.com)

- Via E-Filing
- Via Legal Messenger
- Via Email
- Via U.S. Mail
- Via Fax

21 *Attorney for Plaintiffs*

22 SIGNED on this 14th day of November, 2022 at Seattle, Washington.

23 

24 Rondi A. Greer

IN THE SUPERIOR COURT FOR THE STATE OF WASHINGTON  
IN AND FOR THE COUNTY OF KING

STACY IRWIN and KIMBERLY FERREIRO,	)	
	)	NO. 21-211739-9 SEA
Plaintiffs,	)	<del>GRANTING</del> DENYING
	)	ORDER <del>GRANTING</del> MOTION TO
V.	)	RECONSIDER DETERMINATION
	)	OF PRIVILEGE
CITY OF SEATTLE, a municipal corporation,	)	
	)	
Defendant.	)	

THIS MATTER having come on before the undersigned judge of the above-entitled court and the Court having read all pleadings filed in support and in opposition, and being <sup>fully</sup> fully advised.

IT IS HEREBY ORDERED that the Plaintiffs' Motion to Reconsider the Revised and Updated Order granting the City of Seattle's Motion for a Determination of Privilege entered on November 16, 2022 is <sup>DENIED</sup> GRANTED.

Dated this <sup>2<sup>nd</sup></sup> day of December, 2022.

Judge Suzanne R. Parisien

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Presented by:

          /s/ Jeffrey Needle            
Jeffrey Needle, WSBA #6346  
Susan Mindenbergs, WSBA #20545  
Attorneys for Plaintiffs

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SUPERIOR COURT FOR THE STATE OF WASHINGTON  
IN AND FOR THE COUNTY OF KING

STACY IRWIN and KIMBERLY FERREIRO,  
  
Plaintiffs,  
  
v.  
  
CITY OF SEATTLE, a municipal corporation  
under the laws of the State of Washington,  
  
Defendant.

NO. 21-2-11739-9 SEA

**ORDER DENYING PLAINTIFFS’  
REVISED MOTION TO COMPEL  
DISCOVERY AND FOR *IN CAMERA*  
REVIEW AND THE APPOINTMENT  
OF A SPECIAL MASTER**

THIS MATTER came before the Court on Plaintiffs’ Revised Motion to Compel  
Discovery and for *In Camera* Review and the Appointment of a Special Master (the “Motion”),  
and the Court having considered:

- (a) The Pleadings and files in this matter;
- (b) The Motion;
- (c) Declaration of Stacy Irwin;
- (d) Declaration of Kimberly Ferreiro;
- (e) The Revised Declaration of Jeffrey Needle ISO the Motion;
- (f) Defendant City of Seattle’s Opposition to the Motion;
- (g) Declaration of Sarah Gohmann Bigelow ISO Opposition to the Motion;
- (h) Plaintiffs’ Reply;

1 and having been familiar with the files and records in this case is fully advised.

2 NOW, THEREFORE, the Court rules as follows:

3 Plaintiffs' Motion is hereby **DENIED**. It is so **ORDERED**.

4 DATED: \_\_\_\_\_, 2022.

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The Honorable Suzanne R. Parisien

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11  
12 PRESENTED BY:

13 **SAVITT BRUCE & WILLEY LLP**

14  
15 By: s/James P. Savitt

16 James P. Savitt, WSBA #16847  
17 Sarah Gohmann Bigelow, WSBA #43634  
18 1425 Fourth Avenue Suite 800  
19 Seattle, Washington 98101-2272  
20 Telephone: 206.749.0500  
21 Facsimile: 206.749.0600  
22 Email: [jsavitt@sbwLLP.com](mailto:jsavitt@sbwLLP.com)  
23 Email: [sgohmannbigelow@sbwLLP.com](mailto:sgohmannbigelow@sbwLLP.com)

24  
25 *Attorneys for Defendant City of Seattle*

1 **CERTIFICATE OF SERVICE**

2 I hereby declare under penalty of perjury under the laws of the State of Washington that  
3 on this date, I caused a true and correct copy of the foregoing document to be served on the  
4 following in the manner(s) indicated:

5 Susan B. Mindenbergs, WSBA #20545  
6 Law Office of Susan B. Mindenbergs  
7 705 Second Avenue, Suite 1050  
8 Seattle, WA 98104  
9 Telephone: (206) 447-1560  
10 Facsimile: (206) 447-1523  
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- Via E-Filing
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- Via U.S. Mail
- Via Fax

12 *Attorney for Plaintiffs*

13 Jeffrey L. Needle, WSBA #6346  
14 Law Office of Jeffrey L. Needle  
15 705 Second Avenue, Suite 1050  
16 Seattle, WA 98104  
17 Telephone: (206) 447-1560  
18 Facsimile: (206) 447-1523  
19 Email: [jneedle@wolfenet.com](mailto:jneedle@wolfenet.com)  
20 [jneedle@jneedlelaw.com](mailto:jneedle@jneedlelaw.com)

- Via E-Filing
- Via Legal Messenger
- Via Email
- Via U.S. Mail
- Via Fax

21 *Attorney for Plaintiffs*

22 DATED this 29<sup>th</sup> day of November, 2022 at Seattle, Washington.

23  
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Meghan Parker

King County Superior Court  
Judicial Electronic Signature Page

Case Number: 21-2-11739-9  
Case Title: IRWIN ET ANO VS SEATTLE CITY OF  
Document Title: ORDER RE MOTION FOR IN CAMERA REVIEW  
Signed By: Suzanne Parisien  
Date: January 06, 2023



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Judge: Suzanne Parisien

This document is signed in accordance with the provisions in GR 30.

Certificate Hash: C500F9769F1E11AD3B962C5FEC95F1413821C70B  
Certificate effective date: 7/16/2018 2:19:35 PM  
Certificate expiry date: 7/16/2023 2:19:35 PM  
Certificate Issued by: C=US, E=kcscefiling@kingcounty.gov, OU=KCDJA,  
O=KCDJA, CN="Suzanne Parisien:  
VMmj0wrS5hGRAa/2AFk6yQ=="



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SUPERIOR COURT FOR THE STATE OF WASHINGTON  
IN AND FOR THE COUNTY OF KING

STACY IRWIN and KIMBERLY FERREIRO,  
  
Plaintiffs,  
  
v.  
  
CITY OF SEATTLE, a municipal corporation  
under the laws of the State of Washington,  
  
Defendant.

NO. 21-2-11739-9 SEA  
  
**ORDER GRANTING CITY OF  
SEATTLE’S MOTION TO COMPEL  
DEPOSITION OF PLAINTIFF  
KIMBERLY FERREIRO**

THIS MATTER came before the Court on Defendant City of Seattle’s Motion to  
Compel Deposition of Plaintiff Kimberly Ferreiro (the “Motion”), and the Court having  
considered:

- (a) The Pleadings and files in this matter;
- (b) The Motion;
- (c) Declaration of Sarah Gohmann Bigelow in Support of the Motion and exhibits  
thereto;
- (d) Plaintiffs’ Opposition to the Motion with supporting Declaration; and
- (e) Defendant’s Reply;

and having been familiar with the files and records in this case is fully advised.

1 NOW, THEREFORE, the Motion is **GRANTED** as follows:

2 1. The City is free to note and take depositions, subject to the applicable civil rules,  
3 including but not limited to the depositions of the named Plaintiffs, in whatever sequence it  
4 chooses and irrespective of who Plaintiffs have deposed. Plaintiffs are not permitted to control  
5 the sequence of the City's depositions.

6 2. Plaintiff Kimberly Ferreiro must appear for her video-taped deposition within  
7 fourteen (14) days of this Order at a mutually agreed upon time and date.

8 3. Plaintiffs shall pay the reasonable attorneys' fees and costs incurred by the City  
9 in making this motion. If the parties cannot agree on the amount of such fees and costs, then  
10 the City may apply for them to the Court by motion.

11 **IT IS SO ORDERED.**

12 DATED this \_\_\_\_ day of \_\_\_\_\_, 2022.

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15 \_\_\_\_\_  
The Honorable Suzanne R. Parisien

16  
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22  
23  
24 PRESENTED BY:

25 **SAVITT BRUCE & WILLEY LLP**

26  
27 By:  s/James P. Savitt

1 James P. Savitt, WSBA #16847  
2 Sarah Gohmann Bigelow, WSBA #43634  
3 1425 Fourth Avenue Suite 800  
4 Seattle, Washington 98101-2272  
5 Telephone: 206.749.0500  
6 Facsimile: 206.749.0600  
7 Email: [jsavitt@sbwLLP.com](mailto:jsavitt@sbwLLP.com)  
8 Email: [sgohmannbigelow@sbwLLP.com](mailto:sgohmannbigelow@sbwLLP.com)

9 *Attorneys for Defendant City of Seattle*  
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1 **CERTIFICATE OF SERVICE**

2 I hereby declare under penalty of perjury under the laws of the State of Washington that  
3 on this date, I caused a true and correct copy of the foregoing document to be served on the  
4 following in the manner(s) indicated:

5 Susan B. Mindenbergs, WSBA #20545  
6 Law Office of Susan B. Mindenbergs  
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9 Telephone: (206) 447-1560  
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12 *Attorney for Plaintiffs*

13 Jeffrey L. Needle, WSBA #6346  
14 Law Office of Jeffrey L. Needle  
15 705 Second Avenue, Suite 1050  
16 Seattle, WA 98104  
17 Telephone: (206) 447-1560  
18 Facsimile: (206) 447-1523  
19 Email: [jneedle@wolfenet.com](mailto:jneedle@wolfenet.com)  
20 [jneedle@jneedlelaw.com](mailto:jneedle@jneedlelaw.com)

- Via E-Filing
- Via Legal Messenger
- Via Email
- Via U.S. Mail
- Via Fax

21 *Attorney for Plaintiffs*

22 DATED this 18th day of November, 2022 at Seattle, Washington.

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Meghan Parker

King County Superior Court  
Judicial Electronic Signature Page

Case Number: 21-2-11739-9  
Case Title: IRWIN ET ANO VS SEATTLE CITY OF  
Document Title: ORDER RE MOTION TO COMPEL  
  
Signed By: Suzanne Parisien  
Date: January 06, 2023



---

Judge: Suzanne Parisien

This document is signed in accordance with the provisions in GR 30.

Certificate Hash: C500F9769F1E11AD3B962C5FEC95F1413821C70B  
Certificate effective date: 7/16/2018 2:19:35 PM  
Certificate expiry date: 7/16/2023 2:19:35 PM  
Certificate Issued by: C=US, E=kcscefiling@kingcounty.gov, OU=KCDJA,  
O=KCDJA, CN="Suzanne Parisien:  
VMmj0wrS5hGRAa/2AFk6yQ=="