

**FAX**

4200 23rd Avenue West  
 Seattle, WA 98199-1283  
 Tel: 206-285-6322  
 Fax: 800-238-7307



**\*\*\*PLEASE NOTE:** Our attorney-client needs these records **ON A RUSH BASIS**. Your help in expediting this request is greatly appreciated. We apologize for any inconvenience this may cause.

Please fax any correspondence to my **direct fax: 800-238-7307**. Thank you very much!

Date: **10/15/2021**

Order No: **19070204.20**

To: **Snohomish School District**

Attention: **Kim Radek**

Fax: \_\_\_\_\_

Phone: **(360) 563-7280**

From: **Katherine Wesch**

Email: **Katherine.Wesch@tscan.biz**

Number of pages (including cover): **9**

Comments:

**\*\*Please Note: Attached is a request for confidential records on [REDACTED]\*\***

**When processing a request for the State of Washington, a completed CERTIFICATION form is required to be returned with the records. For all other states, we ask for your cooperation, if regulations allow for the return of this form. If NO RECORDS exist, or you are not the custodian of a particular type of record requested, please indicate this on the CERTIFICATION form as well.**

**Please notify T-Scan if the cost of records will exceed \$150.00.**

THE INFORMATION CONTAINED IN THIS FACSIMILE IS CONFIDENTIAL ATTORNEY WORK PRODUCT AND MAY ALSO BE PRIVILEGED FROM DISCLOSURE UNDER THE ATTORNEY-CLIENT PRIVILEGE. THE INFORMATION IS INTENDED ONLY FOR THE NAMED ADDRESSEE. IF YOU ARE NOT THE INTENDED RECIPIENT OR MAKING DELIVERY TO THE INTENDED RECIPIENT, YOU ARE HEREBY NOTIFIED THAT ANY USE, DISSEMINATION, DISTRIBUTION OR COPYING OF THIS COMMUNICATION IS STRICTLY PROHIBITED. INADVERTENT DELIVERY DOES NOT WAIVE OUR PRIVILEGE AGAINST DISCLOSURE. IF YOU HAVE RECEIVED THE FACSIMILE IN ERROR, PLEASE DO NOT READ IT AND IMMEDIATELY NOTIFY US BY A COLLECT TELEPHONE CALL TO 206-285-6322, AND RETURN THE ORIGINAL MESSAGE TO US AT THE ADDRESS ABOVE VIA THE U.S. POSTAL SERVICE.

**ORDER NO: 19070204.20**

KATHERINE WESCH  
EMAIL: KATHERINE.WESCH@TSCAN.BIZ  
PHONE: (206) 285-6322  
FAX: (800) 238-7307



T-SCAN CORPORATION  
4200 23RD AVENUE WEST  
SEATTLE, WA 98199-1283



10/15/2021

Attn: Kim Radek  
Snohomish School District  
1601 Avenue D  
Snohomish, WA 98290

**PLEASE COMPLETE AS SOON AS POSSIBLE.**  
**Client Request Date: ASAP**

**\*\*\*PLEASE NOTE:** Our attorney-client needs these records **ON A RUSH BASIS**. Your help in expediting this request is greatly appreciated. We apologize for any inconvenience this may cause.

Please fax any correspondence to my **direct fax: 800-238-7307**. Thank you very much!

Dear Records Custodian:

T-Scan Corporation has been requested to obtain records for the below-named individual:

Request for Records of: [REDACTED]  
Date of Birth: [REDACTED]  
SSN: **xxx-xx-2412**  
Record Types: **Academic Records**  
Date Range: **Any and All Dates**

Enclosed please find:

1. A CERTIFICATION of records form. *This form must be filled out and returned either with the records, or to indicate that you have no records on the above-named individual.*
2. A signed HIPAA compliant authorization.
3. A resale certificate. *Billing: T-Scan does not pay sales tax on records, so it cannot be included on your invoice to T-Scan. This form accounts for the sales tax in your records. If there will be a charge for your services, please include an itemized bill with the records.*

Please send **1 Copy** of the **Academic Records** to the address above. If these records are maintained at different locations and require separate requests, please forward this request to obtain records as soon as possible from all locations. Please notify T-Scan of any radiographic films included in the records, as more than one copy of may be required.

**For any invoice amount over \$150.00**, please **fax** (F:(800) 238-7307), **e-mail** (Katherine.Wesch@tscan.biz), or **call** (P:(206) 285-6322) T-Scan with the full amount and page count before sending records.

Thank you for your prompt attention to this request. Should you have question or concerns in this regard, please do not hesitate to contact our office directly at (206) 285-6322.

Katherine Wesch  
Account Specialist

Enclosures \_\_\_\_\_

ORDER NO: 19070204.20

KATHERINE WESCH  
EMAIL: KATHERINE.WESCH@TSCAN.BIZ  
PHONE: (206) 285-6322  
FAX: (800) 238-7307



T-SCAN CORPORATION  
4200 23RD AVENUE WEST  
SEATTLE, WA 98199-1283



10/15/2021

## CERTIFICATION

The Records Custodian For: **Snohomish School District**

Answer the Following Questions Regarding: [REDACTED]

Date of Birth: [REDACTED] Social Security Number: **xxx-xx-2412**

1. Please state your name, name of business, address and telephone number:

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

2. Are you the authorized record custodian/librarian?

\_\_\_\_ YES \_\_\_\_ NO: Explain: \_\_\_\_\_

3. Are the attached documents the complete **Academic Records** of the above-named facility regarding the above named person from **Any and All Dates**?

\_\_\_\_ YES, the following questions (3.1) MUST be completed:

**3.1** How many pages of **Academic Records** are you providing T-Scan? \_\_\_\_\_

\_\_\_\_ NO. What documents have been omitted? \_\_\_\_\_

4. Were these records created, kept and maintained by the above-named entity in the regular course of business at or near the time of the act, condition or event recorded herein?

\_\_\_\_ YES \_\_\_\_ NO: Explain: \_\_\_\_\_

5. If photocopies have been made of the original records, were copies made under your direction and control and are they true and correct copies?

\_\_\_\_ YES \_\_\_\_ NO: Explain: \_\_\_\_\_

### MARK BELOW IF NO RECORDS EXIST:

\_\_\_\_ I certify that this facility **does not** have records pertaining to the above-named individual and/or time frame as requested, due to the following:

\_\_\_\_ No dates of service exist.

\_\_\_\_ The records have been destroyed in compliance under state laws.

\_\_\_\_ The records are maintained by the following facility: \_\_\_\_\_

\_\_\_\_ Other, Explain: \_\_\_\_\_

**I hereby certify and declare under the penalty of perjury in accordance with the laws of the State of Washington, that the foregoing is true and correct.**

X

\_\_\_\_\_  
Authorized Custodian or Representative Signature

Dated at \_\_\_\_\_, WA, this \_\_\_\_\_ of \_\_\_\_\_, 20\_\_\_\_.

KATHERINE WESCH  
EMAIL: KATHERINE.WESCH@TSCAN.BIZ

PHONE: (206) 285-6322  
FAX: (800) 238-7307

July 16, 2019

**Allison K. Krashan**

Admitted in Washington and Oregon

T: 206-689-1216

C: 206-334-5707

akrashan@schwabe.com

TO ALL MEDICAL, EMPLOYMENT,  
INSURANCE, ACADEMIC AND L&I  
CUSTODIANS

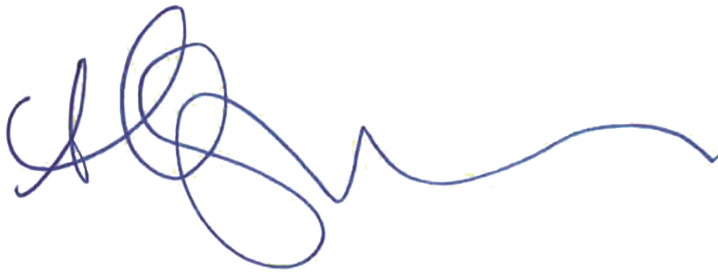
RE: [REDACTED], et al. v. Monsanto Company, et al.  
King County Superior Court No. 18-2-23255-4 SEA  
Our File No.: [REDACTED]

To Whom It May Concern:

Please be advised that Schwabe Williamson & Wyatt has retained T-Scan Record Retrieval Service as our agent for purposes of procuring medical, billing, employment, insurance, academic and L&I records. We request your cooperation in providing the records in a timely manner to T-Scan.

If you have any questions, please contact Kelly Hamilton at (206) 407-1590 or khamilton@schwabe.com.

Very truly yours,



Allison K. Krashan

AKM:kah  
Enclosure

The Honorable Regina Cahan

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

[REDACTED], individually and as legal  
guardian of minors [REDACTED] and [REDACTED]; [REDACTED]  
[REDACTED] and [REDACTED],  
individually and as legal guardians of minors  
[REDACTED] and [REDACTED]; [REDACTED]  
and [REDACTED], individually and  
as legal guardians of minors [REDACTED] and [REDACTED]  
and DOES 1-226,

Plaintiffs,

vs.

MONSANTO COMPANY, a Delaware  
corporation; SOLUTIA INC., a Delaware  
corporation; PHARMACIA LLC, a Delaware  
limited liability corporation; f/k/a Pharmacia  
Corporation; MONROE SCHOOL DISTRICT  
NO. 103 d/b/a MONROE PUBLIC SCHOOL;  
UNION HIGH SCHOOLS; UNION HIGH  
SCHOOL DISTRICT NO. 402;  
SNOHOMISH HEALTH DISTRICT; and  
ROES 1-10,

Defendants.

No. 18-2-23255-4

STIPULATION TO OBTAIN SCHOOL  
RECORDS OF MINOR PLAINTIFF  
[REDACTED].

IT IS HEREBY STIPULATED by and between the parties to this action and through  
their respective attorneys of record that all school records, including but not limited to  
complete copies of academic file, disciplinary file, attendance records, report cards, nurses'

STIPULATION TO OBTAIN SCHOOL RECORDS OF  
MINOR PLAINTIFF A.A.S. - 1

SCHWABE, WILLIAMSON & WYATT, P.C.  
Attorneys at Law  
1420 5th Avenue, Suite 3400  
Seattle, WA 98101-4010  
Telephone: 206 622.1711

1 notes, counseling records, psychology records, certificates of achievement, and  
2 correspondence in the school files, as well as any reports and/or correspondence from any  
3 treating physicians, counselors, psychologists, or other mental health professions, held by the  
4 schools listed on Page 3 of this document relating to [REDACTED], DOB: [REDACTED]; SSN: XXX-  
5 XX-2412, are to be copied and said copies sent to counsel for the parties as requested on the  
6 signature page of this document. Each party requesting records shall be responsible for costs  
7 relative thereto.

8 IT IS FURTHER STIPULATED that the records so produced shall be identified as the  
9 records of [REDACTED] herein and further identification at time of trial waived, but that objections  
10 as to competency, materiality, and relevancy are reserved until the time of trial.

11 Dated this 7th day of June, 2019.

12 Do you want a copy at your own expense?  
13 YES \_\_\_\_\_ NO XX

14 FRIEDMAN RUBIN PLLP

15 By: s/ Sean J. Gamble  
16 Sean J. Gamble, WSBA #41733  
17 Friedman Rubin PLLP  
18 1109 First Avenue, Suite 501  
19 Seattle, WA 98101  
20 *Attorneys for Plaintiffs*

21 Do you want a copy at your own expense?  
22 YES \_\_\_\_\_ NO \_\_\_\_\_

23 EVANS, CRAVEN & LACKIE, P.S.

24 By: \_\_\_\_\_  
25 Christopher J. Kerley, WSBA #16489  
26 Evans, Craven & Lackie, P.S.  
818 W. Riverside, Suite 350  
Spokane, WA 99201  
*Attorneys for Defendant Snohomish Health District*

Do you want a copy at your own expense?  
YES X NO \_\_\_\_\_

SCHWABE, WILLIAMSON & WYATT

By: /s/ Jennifer Campbell  
Jennifer Campbell, WSBA #31703  
Allison K. Krashan, WSBA #36977  
Schwabe, Williamson & Wyatt, P.C.  
1420 Fifth Avenue, Suite 3400  
Seattle, WA 98101 *Attorneys for*  
*Defendants Monsanto Company, Solutia*  
*Inc., and Pharmacia LLC*

Do you want a copy at your own expense?  
YES X NO \_\_\_\_\_

PATTERSON BUCHANAN FOBES &  
LEITCH, INC., P.S.

By: s/ Michael T. Kitson  
Patricia K. Buchanan, WSBA #19892  
Michael T. Kitson, WSBA #41681  
Patterson Buchanan Fobes & Leitch  
2112 Third Avenue, Suite 500  
Seattle, WA 98121  
*Attorneys for Defendant Monroe School*  
*District d/b/a Monroe Public Schools*

STIPULATION TO OBTAIN SCHOOL RECORDS OF  
MINOR PLAINTIFF [REDACTED] - 2

SCHWABE, WILLIAMSON & WYATT, P.C.  
Attorneys at Law  
1420 5th Avenue, Suite 3400  
Seattle, WA 98101-4010  
Telephone: 206 622.1711



1                                    AUTHORIZATION OF HOPE M. SOLEY,  
2                                    AS LEGAL GUARDIAN OF MINOR A.A.S.

3                    I HEREBY AUTHORIZE RELEASE OF THE SCHOOL RECORDS FOR FROM  
4 THE SCHOOLS LISTED BELOW.

5                    DATED this 15 day of October 2021 at \_\_\_\_\_,  
6 Washington.

7                    [Redacted Signature]  
8                    [Redacted], as Legal Guardian for minor [Redacted]

9                    Full Name: [Redacted]  
10                    . DOB: [Redacted]  
11                    . SSN: XXX-XX-2412

12                                    SCHOOLS

13 Sky Valley Education Center  
14 351 Short Columbia Street  
15 Monroe, WA 98272

16 Dutch Hill Elementary School  
17 8231 131st Avenue SE  
18 Snohomish, WA 98290

19 Maltby Elementary School  
20 9700 212th Street SE  
21 Snohomish, WA 98296

22 HomeLink (homeschool)

23 Monroe Montessori  
24 733 Village Way,  
25 Monroe, WA 98272

26 Snohomish School District  
1601 Avenue D  
Snohomish, WA 98290

STIPULATION TO OBTAIN SCHOOL RECORDS OF  
MINOR PLAINTIFF [Redacted] - 3

SCHWABE, WILLIAMSON & WYATT, P.C.  
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Telephone: 206 622.1711

CERTIFICATION OF RECORDS CUSTODIAN

1. My name is \_\_\_\_\_.
2. I am employed by \_\_\_\_\_ as a \_\_\_\_\_  
and my business address is \_\_\_\_\_.
3. My duties include responsibility as custodian of records for \_\_\_\_\_  
at \_\_\_\_\_.
4. The records produced by our facility in accordance with this stipulation are the  
authentic and complete records of [REDACTED] and are kept in the regular course of our business.
5. I certify under penalty of perjury under the laws of the State of Washington that  
the foregoing is true and correct.

\_\_\_\_\_  
Date and Place

\_\_\_\_\_  
Records Custodian

STIPULATION TO OBTAIN SCHOOL RECORDS OF  
MINOR PLAINTIFF [REDACTED] . - 4

SCHWABE, WILLIAMSON & WYATT, P.C.  
Attorneys at Law  
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Seattle, WA 98101-4010  
Telephone: 206 622.1711





# RESELLER PERMIT

Washington State Department of Revenue  
PO Box 47476 • Olympia, WA 98504-7476 • 1-800-647-7706

602 216 698  
T-SCAN CORPORATION  
4200 23RD AVE W  
SEATTLE, WA 98199-1283

**Permit Number:** A08 5605 17

**Effective Date:** 01-01-2018  
**Expiration Date:** 12-31-2021

**Business Activities:**  
DOCUMENT PREPARATION SERVICES

**This permit can be used to purchase:**

- Merchandise and inventory for resale without intervening use
- Ingredients, components, or chemicals used in processing new articles of tangible personal property produced for sale
- Feed, seed, seedlings, fertilizer, and spray materials by a farmer
- Materials and contract labor for retail/wholesale construction
- Items for dual purposes (see Purchases for Dual Purposes on back)

**This permit cannot be used to purchase:**

- Items for personal or household use
- Promotional items or gifts
- Items used in your business that are not resold, such as office supplies, equipment, tools, and equipment rentals
- Materials and contract labor for public road construction or U.S. government contracting (see Definitions on back)
- Materials and contract labor for speculative building

**This permit is no longer valid if the business is closed.**

**The business named on this permit acknowledges:**

- It is solely responsible for all purchases made under this permit
- Misuse of the permit:
  - Subjects the business to a penalty of 50 percent of the tax due, in addition to the tax, interest, and penalties imposed (RCW 82.32.291)
  - May result in this permit being revoked

**Notes (optional):**

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**Important:** The Department of Revenue may use information from sellers to verify all purchases made with this permit were qualified.