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6 **POLLUTION CONTROL HEARINGS BOARD**  
7 **STATE OF WASHINGTON**

8 WILL AND ANDRA EDWARDS,

PCHB No. 21-011

9 Appellants,

10 v.

RESPONDENT STATE OF WASHINGTON,  
DEPARTMENT OF ECOLOGY'S FIRST  
INTERROGATORIES AND REQUESTS  
FOR PRODUCTION OF DOCUMENTS TO  
APPELLANTS

11 STATE OF WASHINGTON,  
12 DEPARTMENT OF ECOLOGY,

13 Respondent.

14 TO: Will and Andra Edwards, Appellants;

15 AND TO: Toni Meacham, Attorney for Appellants.

16 In accordance with WAC 371-08-300 and Civil Rule 33, you are directed to answer the  
17 following interrogatories, separately and fully under oath, within thirty (30) days of service of  
18 them upon you. Type the answers in the space provided, adding pages if additional space is  
19 required. An electronic version of these interrogatories and requests for production has been  
20 provided to you to assist in this regard. Please return the original of the answered interrogatories  
21 to counsel for the Department of Ecology, Julian Beattie, P.O. Box 40117, Olympia, WA  
22 98504-0117.

23 In addition, pursuant to WAC 371-08-300 and Civil Rule 34, you are directed to produce  
24 for Ecology's inspection and copying the documents hereinafter described. The documents should  
25 be produced for inspection and copying at 2425 Bristol Court S.W., Olympia, WA 98504-0117. In  
26 lieu of producing the documents for inspection, you may mail the documents or copies to the  
ECOLOGY'S FIRST INTERROGATORIES AND REQUESTS FOR PRODUCTION TO

APPELLANTS

1

ATTORNEY GENERAL OF WASHINGTON

Ecology Division  
PO Box 40117  
Olympia, WA 98504-0117  
360-586-6770

1 above address with instructions specifying whether you wish them to be copied and returned or to  
2 be retained. In accordance with WAC 371-08-146 and Civil Rule 34(b), you must serve your  
3 written responses hereto, separately, and in writing, within thirty (30) days of service of this  
4 request.

5 **Supplemental Answers.** These interrogatories and requests for production are to be  
6 treated as continuing. In the event you discover further information or documents that are  
7 responsive to these interrogatories and requests for production of documents, you are to  
8 supplement the answers by additional answers or the production of additional documents. If  
9 additional information is discovered between the time of making these answers and the time of  
10 hearing, these interrogatories and requests for production are directed to that information. If  
11 such information is not promptly furnished, Ecology will move to exclude from evidence any  
12 information requested and not furnished.

13 **Reliance Upon Answers.** Take notice that Ecology will rely upon the accuracy and  
14 completeness of the answers given in response to these interrogatories and requests for  
15 production of documents and will presume that they have been supplemented as required.  
16 Claims and witnesses not supported by your answers will be objected to.

17 **Sources of Knowledge.** In answering these interrogatories and requests for  
18 production, include all information, including hearsay, that is within your custody, possession,  
19 or control, including, but not limited to, knowledge or documents in your custody, possession,  
20 or control, or that of associated or related organizations, or that of those under common  
21 control, predecessors, or successors in interest, consultants, accountants, attorneys,  
22 investigators or other agents or independent contractors.

23 When facts set forth in answers or portions thereof are supplied upon information and  
24 belief, rather than actual knowledge, so state, and specifically describe or identify the source or  
25 sources of such information and belief. Should you be unable to answer any interrogatories or  
26

1 requests for production or portion thereof by either actual knowledge or upon information and  
2 belief, describe your efforts to obtain such information.

3 **Objections.** If you contend the answer to any interrogatory or request for production is  
4 privileged in whole or in part, or otherwise object to any part of any interrogatory or request  
5 for production, or maintain that a document would be excludable from production to Ecology  
6 in discovery regardless of its relevance, identify the document and describe the reasons for  
7 each objection or ground for exclusion, and identify each person having knowledge of the  
8 factual basis, if any, on which the privilege or other ground is asserted.

9 CR 33 states in part:

10  
11 An interrogatory otherwise proper is not necessarily objectionable merely because  
12 an answer to the interrogatory involves an opinion or contention that relates to fact  
13 or the application of law to fact, but the court may order that such an interrogatory  
14 need not be answered until after designated discovery has been completed or until  
15 a pretrial conference or other later time.

16 Accordingly, in the absence of a protective order, you are required to answer those  
17 interrogatories and requests for production which seek to discover your contentions.

18 **Information Contained In Documents.** A question that seeks information contained  
19 in, or information about, or identification of, any documents may be answered by providing a  
20 copy of such document without a request for production. If in response to any of these  
21 interrogatories and requests for production you make reference to and/or produce specific  
22 documents, please label the document as relating to the specific interrogatory or request for  
23 production involved and point out the portion of such document that specifically answers the  
24 interrogatory or request for production presented.

25 **Document Format.** All documents produced pursuant to the interrogatories and  
26 requests for production are to be produced in the form, order, and manner in which they are  
maintained in your files. Documents are to be produced in the file folders and file cartons in  
which they have been maintained or stored, clipped, stapled, or otherwise arranged in the same

1 form and manner as they are found by you. If any documents requested herein were at one time  
2 in existence, but are no longer, for each document please describe:

- 3
- 4 (a) The document type;
- 5 (b) The date upon which it ceased to exist;
- 6 (c) How it ceased to exist;
- 7 (d) The names of all persons having knowledge of the circumstances under which it  
8 ceased to exist; and
- 9 (e) The names of all persons with any familiarity of the contents of each such  
10 document.

11 **Definitions.** The following definitions shall apply throughout these interrogatories and  
12 requests for production.

13 For the purpose of these interrogatories and requests for production, the term  
14 “**Administrative Order**” means Administrative Order Docket No. 19584 issued by the  
15 Department of Ecology.

16 For the purpose of these interrogatories and requests for production, the term  
17 “**describe**” means to specify in detail and to particularize the content of the answer to the  
18 question and not merely to state the reply in summary or outline fashion.

19 For the purpose of these interrogatories and requests for production, the term  
20 “**Property**” means the parcel(s) that include the land identified as the Site Location in the  
21 Administrative Order—viz., WA-272 – Palouse, WA; Upstream end of operations Lat 46°  
22 55’55.1” Long -117° 07’32.0”; Downstream end of operations Lat 46° 55’46.1” Long  
23 -117°07’02.8”.

24 For the purpose of these interrogatories and requests for production, the term “**you**” or  
25 “**your**” refers to Will and Andra Edwards, individually or collectively, or any agent thereof. If  
26

1 your answer or response refers to Will Edwards or Andra Edwards, but not to both, please  
2 specify the person to whom you are referring.  
3

#### 4 **INTERROGATORIES AND REQUESTS FOR PRODUCTION**

5 **INTERROGATORY NO. 1:** Identify all persons answering or providing information  
6 with regard to these interrogatories and requests for production, providing as to each, their full  
7 name and the number(s) of the interrogatories or requests for production answered, or for  
8 which information was provided.

#### 9 **ANSWER:**

10 Dr. Andra Edwards

11 Dr. William Edwards  
12

13 **INTERROGATORY NO. 2:** Identify each person you intend to use as an expert  
14 witness at the hearing in the present appeal before the Pollution Control Hearings Board, and  
15 for each such person:

- 16 (a) State the subject matter on which the expert is expected to testify.  
17 (b) State the substance of the facts and opinions to which the expert is expected to  
testify.  
18 (c) Summarize the basis or grounds for each such opinion.  
19 (d) Identify each report, summary, study, or other document prepared by the expert  
relating to the subject matter on which the expert is expected to testify.  
20 (e) State the compensation to be paid to the expert for preparation and testimony.  
21 (f) Provide a complete list of all publications authored by the expert within the  
preceding ten years.  
22 (g) Provide a complete list of all cases in which the expert has testified in an expert  
capacity at trial, hearing, or deposition within the preceding ten years.

#### 23 **ANSWER:**

24 Dr. Erin Kennedy

25 Owner of Success in Motion Veterinary Services, PLLC

26 3523 W Woolard Rd

1 Colbert, WA 99005

2 (509) 995-5103

3 a) Dr. Kennedy is a primarily equine veterinarian and will discuss equine health, overall  
4 wellness, and nutrition.

5 b) Dr. Kennedy can testify to the importance of adequate space, water, and forage as it  
6 pertains to the health and welfare of horses. She can verify that the space the two horses  
7 currently occupy is appropriate for healthy grazing practices pertaining to the two horses in  
8 question. Dr. Kennedy can also discuss the fact that adult horses do not share many of the  
9 same diseases found in young cattle as insinuated by Chad Atkins in the document titled  
10 "Declaration of Chad Atkins," specifically leptospirosis, cryptosporidium, anthrax,  
11 brucellosis, and salmonella, and that the two horses currently occupying the space do not  
12 pose a substantial risk of spreading leptosporosis, cryptosporidium, anthrax, brucellosis, or  
13 salmonella.

14 c) Dr. Kennedy has been practicing equine medicine since 2005 and has extensive experience  
15 and knowledge regarding equine health and wellness.

16 d) Unknown

17 e) Dr. Kennedy is not being compensated for her testimony.

18 f) None

19 g) None

20 **REQUEST FOR PRODUCTION NO. 1:** Produce all documents identified in your  
21 answer to Interrogatory No. 2, including, but not limited to, any reports, studies, notes, data,  
22 and working papers.

23 **RESPONSE:**

1           **REQUEST FOR PRODUCTION NO. 2:** Produce a current curriculum vitae for each  
2 expert and/or individual identified in answer to Interrogatory No. 2.

3           **RESPONSE:**

4           **INTERROGATORY NO. 3:** Identify the parcel(s) that contain the Property.

5           **ANSWER:**

6 Parcel #200004517342690

7           **INTERROGATORY NO. 4:** State the approximate dimensions and acreage of the  
8 Property.

9           **ANSWER:**

10 Approximately 8 acres

11 Approximately 200 feet wide by 2200 ft long

12           **INTERROGATORY NO. 5:** Describe Will Edwards' legal interest(s) in the Property  
13 from 2013 to present.

14           **ANSWER:**

15 Co-owner

16           **INTERROGATORY NO. 6:** Identify all parcels adjacent to the Property that are  
17 owned by Will Edwards.

18           **ANSWER:**

19 None

20           **INTERROGATORY NO. 7:** Describe Andra Edwards' legal interest(s) in the  
21 Property from 2013 to present.

22           **ANSWER:**

23 Co-owner

24           **INTERROGATORY NO. 8:** Identify all parcels adjacent to the Property that are  
25 owned by Andra Edwards.

1 **ANSWER:**

2 None

3 **INTERROGATORY NO. 9:** Identify all other person(s) having a legal interest in the  
4 Property from 2013 to present, including lessees/tenants, and describe each person's interest.

5 **ANSWER:**

6 None

7 **INTERROGATORY NO. 10:** State the type of livestock and the maximum number of  
8 each type kept on the Property in 2021, whether you owned the livestock or not.

9 **ANSWER:**

10 Two Equines resided on the property in 2021, "Miller," a 16 year old sorrel paint  
11 gelding, and "Kirsi," a 16 year old sorrel mare.

12 **INTERROGATORY NO. 11:** Describe Will Edwards' legal interest(s) in the livestock  
13 identified in your answer to Interrogatory No. 10.

14 **ANSWER:**

15 These two horses are family pets used for non-competitive pleasure riding and companionship.

16 **INTERROGATORY NO. 12:** Describe Andra Edwards' legal interest(s) in the  
17 livestock identified in your answer to Interrogatory No. 10.

18 **ANSWER:**

19 These two horses are family pets used for non-competitive pleasure riding and companionship.

20  
21 **INTERROGATORY NO. 13:** Identify any other person(s) having a legal interest in the in the  
22 livestock identified in your answer to Interrogatory No. 10, and describe each person's interest.

23 **ANSWER:**

24 Lola Edwards, age 16, daughter of William and Andra Edwards  
25  
26



1 The sorrel mare, "Kirsi," belongs to Lola, and is primarily used by Lola for  
2 companionship and non-competitive pleasure riding.

3 **INTERROGATORY NO. 14:** State the approximate date on which you began  
4 keeping livestock on the Property.

5 **ANSWER:**

6 June, 1997

7 **INTERROGATORY NO. 15:** State the type of livestock and the maximum number of  
8 each type kept on the Property for each year from 2013 to 2020, whether you owned the  
9 livestock or not.

10 **ANSWER:**

11 2013: One bovine, four equine

12 2014 : One bovine, 4 equine

13 2015: One bovine, 4 equine

14 2016: Three equine

15 2017: Three equine

16 2018: Four equine

17 2019: Two equine

18 2020: Two equine

19 2021: Two equine

20 Present: Two equine

21  
22 **INTERROGATORY NO. 16:** State Al Bruns' full legal name, current mailing  
23 address, current phone number, and job title.

24 **ANSWER:**

25 Al Bruns

1  
2 Retired

3  
4 **INTERROGATORY NO. 17:** State Al Bruns' relationship to Will Edwards and to  
5 Andra Edwards.

6 **ANSWER:**

7 Friend and neighbor

8 **INTERROGATORY NO. 18:** State the subject(s) on which you expect Al Bruns to  
9 present evidence at hearing.

10 **ANSWER:**

11 Al Bruns was present during the site visit and conversation with Chad Atkins and Steve  
12 Hummel June 27th, 2017. He was witness to the conversation in which Steve Hummel stated  
13 that the Department of Ecology would "make an example of us (William and Andra Edwards)  
14 because we are on the highway" as well as the conversation in which Steve Hummel stated to  
15 William and Andra Edwards that the Conservation District "had no right to make  
16 recommendations." Mr. Bruns was also present when we (William and Andra Edwards) asked  
17 Steve Hummel to produce technical assistance and WAC references, neither of which were  
18 provided. Mr. Bruns can attest to the fact that no technical assistance was given regarding  
19 WAC inquiries, only financial assistance was offered with the added suggestion that William  
20 and Andra Edwards purchase neighboring farmland to expand the pasture size.

21 **INTERROGATORY NO. 19:** State Janelle Parsons' full legal name, current mailing  
22 address, current phone number, and job title.

23 **ANSWER:**

24 Janelle Rae Parsons

25 202 Koenig Road  
26

1 Palouse, WA 99161

2 (509) 878-1615

3 Retired

4  
5  
6 **INTERROGATORY NO. 20:** State Janelle Parsons' relationship to Will Edwards and  
7 to Andra Edwards.

8 **ANSWER:**

9 Janelle Parsons is Andra Edwards' mother and William Edwards' mother in law. The  
10 farmland directly adjacent to William and Andra Edwards' property is owned by Janelle  
11 Parsons, her husband Reggie Parsons and the two siblings and mother of Reggie Parsons.

12 **INTERROGATORY NO. 21:** State the subject(s) on which you expect Janelle  
13 Parsons to present evidence at hearing.

14 **ANSWER:**

15 Janelle Parsons was present during the site visit and conversation with Chad Atkins and  
16 Steve Hummel June 27th, 2017. She was witness to the conversation in which Steve Hummel  
17 stated that the Department of Ecology would "make an example of us (William and Andra  
18 Edwards) because we are on the highway" and told William and Andra Edwards that the  
19 Conservation District "had no right to make recommendations." Janelle Parsons was also  
20 present when we (William and Andra Edwards) asked Steve Hummel to produce technical  
21 assistance and WAC references. Janelle Parsons can attest to the fact that no technical  
22 assistance was given regarding WAC inquiries, only financial assistance was offered with the  
23 added suggestion that William and Andra Edwards purchase neighboring farmland to expand  
24 the pasture size. The neighboring farmland is owned by Janelle Parsons and her husband  
25  
26

1 Reggie Parsons and is not for sale, which she informed Steve Hummel during that  
2 conversation.

3  
4 **INTERROGATORY NO. 22:** State Anna Pfeiffer’s full legal name, current mailing  
5 address, current phone number, and job title.

6 **ANSWER:**

7 Dr. Anna Marie Pfeiffer  
8 5612 North Post Street  
9 Spokane, WA 99205  
10 (509) 339-3078

11 Veterinarian and Owner, Cougar Veterinary Services, LLC

12 **INTERROGATORY NO. 23:** State the subject(s) on which you expect Anna Pfeiffer  
13 to present evidence at hearing.

14 **ANSWER:**

15 Dr. Pfeiffer can speak to the health and disease free status of the two equine housed in  
16 the pasture (“Kirsi” and “Miller”), the appropriateness of the size and forage availability of the  
17 pasture in regards to the animals housed there, and the negative health, wellness and quality of  
18 life impacts that will result from restriction of access to space and natural roughage for the  
19 animals in question.

20 **INTERROGATORY NO. 24:** Describe Anna Pfeiffer’s education, professional  
21 experience, training, or certification in the subjects of water quality, pollution control, stream  
22 restoration, and riparian management.

23 **ANSWER:**

24 Dr. Pfeiffer is a mixed animal veterinarian with nearly 10 years of large animal  
25 experience. She graduated from Washington State University College of Veterinary Medicine  
26

1 in 2012, completing an internship in large animal medicine and surgery thereafter, also at  
2 Washington State University College of Veterinary Medicine. As a part of her curriculum and  
3 internship, Dr. Pfeiffer has had training in large animal nutrition and management of livestock  
4 resources such as pastures and water as they pertain to livestock and companion large animal  
5 herd health and wellness.

6 **INTERROGATORY NO. 25:** State the subject(s) on which you expect Drew Schuldt  
7 to present evidence at hearing.

8 **ANSWER:**

9 Drew Schuldt can discuss the site visit to William and Andra Edwards' property in  
10 April 2014. At that visit he made several suggestions that could help keep the pastured animals  
11 healthy while maintaining water quality health. At this visit he acknowledged to Andra  
12 Edwards that the extensive basalt near the drainage ditch would make planting vegetation and/  
13 or installing fence posts extremely difficult. He suggested alternative options, including  
14 feeding animals as far from the drainage ditch as possible, rotating feeding sites, moving the  
15 manure disposal pile out of the pasture, and providing an alternative water source.

16 **REQUEST FOR PRODUCTION NO. 3:** Produce all communications between you  
17 and Drew Schuldt, from 2013 to present, related to water quality or stream corridor  
18 management at the Property, or related to any technical assistance letter, warning letter, or  
19 order issued to you by the Department of Ecology.

20 **RESPONSE:**

21 See Exhibit 1: Email from Drew Schuldt to William Edwards sent 5/10/2018

22 **INTERROGATORY NO. 26:** State the subject(s) on which you expect Joe Schmick  
23 to present evidence at hearing.

24 **ANSWER:**

25 None  
26

1           **REQUEST FOR PRODUCTION NO. 4:** Produce all communications between you  
2 and Joe Schmick, from 2013 to present, related to water quality or stream corridor management  
3 at the Property, or related to any technical assistance letter, warning letter, or order issued to  
4 you by the Department of Ecology.

5           **RESPONSE:**

6 See Exhibit 3 (PDF file titled Heather DOE Letter Exhibit 3)

7 See Exhibit 4 (PDF file titled Joe Schmick DOE Letter Exhibit 4)

8           **INTERROGATORY NO. 27:** Do you allow non-owned animals on the Property  
9 during the operation of the business known as The Little Clinic Veterinary Services Inc., UBI  
10 Number 603 491 579? If yes, describe the types of animals that come to the Property, the  
11 circumstances under which they arrive, and how long they typically remain.

12           **ANSWER:**

13 No, The Little Clinic Veterinary Services Inc. (TLC Animal Care) does not allow client  
14 animals into the horse pasture.

15           **INTERROGATORY NO. 28:** Describe all business operations conducted on the  
16 Property.

17           **ANSWER:**

18 No business operations are conducted on the property.

19           **REQUEST FOR PRODUCTION NO. 5:** Produce all data, analytical results, lab  
20 reports, and other documents related to water samples or water quality tests taken at the  
21 Property from 2013 to present.

22           **RESPONSE:**

23 No water samples or water quality tests have been performed by William and/or Andra  
24 Edwards as of March 20, 2022.

1           **REQUEST FOR PRODUCTION NO. 6:** Produce the “Detailed Timeline of Events”  
2 identified as a potential hearing exhibit in your Proposed Exhibits filed with the Pollution  
3 Control Hearings Board in March 2020.

4           **RESPONSE:**

5 See Exhibit 5 (PDF file titled DOE 12 16 19 Letter Exhibit 5)

6 See Exhibit 6 (PDF file titled Edwards Letter 12 16 19 Exhibit 6)

7 See Exhibit 7 (PDF file titled DOE Timeline Exhibit 7)

8           **REQUEST FOR PRODUCTION NO. 7:** Produce all “Photos” identified as potential  
9 hearing exhibits in your Proposed Exhibits filed with the Pollution Control Hearings Board in  
10 March 2020.

11           **RESPONSE:**

12 See Exhibit 8 (PDF file titled Photos)

13           **REQUEST FOR PRODUCTION NO. 8:** Produce the “Diagram of proposed fencing  
14 with impact of animal husbandry” identified as a potential hearing exhibit in your Proposed  
15 Exhibits filed with the Pollution Control Hearings Board in March 2020.

16           **RESPONSE:**

17 See Exhibit 9 (PDF file titled Area Available for Animals Currently)

18 See Exhibit 10 (PDF file titled Area Available for Animals with Proposed Restrictions)

19  
20           **REQUEST FOR PRODUCTION NO. 9:** Produce all communications from January  
21 1, 2013, to present between you and any employee or agent of the Palouse Conservation  
22 District related to water quality or stream corridor management at the Property, or related to  
23 any technical assistance letter, warning letter, or order issued to you by the Department of  
24 Ecology.

25           **RESPONSE:**

1 See Exhibit 1 (PDF file Drew Letter Exhibit 1)

2 See Exhibit 2 (PDF file Bradley DOE Letter Exhibit 2)

3  
4 **INTERROGATORY NO. 29:** Describe Will Edwards' education, professional  
5 experience, training, or certification in the subjects of water quality, pollution control, stream  
6 restoration, and riparian management.

7 **ANSWER:**

8 None

9 **INTERROGATORY NO. 30:** Describe Andra Edwards' education, professional  
10 experience, training, or certification in the subjects of water quality, pollution control, stream  
11 restoration, and riparian management.

12 **ANSWER:**

13 None

14 **INTERROGATORY NO. 31:** Describe the location and type of all off-stream  
15 watering facilities on the Property from 2019 to present.

16 **ANSWER:**

17 One 200 gallon watering trough in the far southwest corner of the pasture near the main pasture  
18 gate. Note there is also a 200 gallon watering trough located off the property in a temporary  
19 livestock pen to be used if pasture health warrants rotation. This area is used for pasture  
20 rotation intermittently.

21  
22 DATED this 31st day of January 2022.

23  
24 ROBERT W. FERGUSON  
25 Attorney General  
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JULIAN H. BEATTIE, WSBA #45586  
Assistant Attorney General  
*julian.beattie@atg.wa.gov*  
Attorneys for Respondent  
State of Washington Department of Ecology  
360-586-6749

1 **VERIFICATION**

2 STATE OF WASHINGTON )  
3 ) ss.  
4 COUNTY OF \_\_\_\_\_)

5 The undersigned, being first duly sworn on oath, deposes and says:

6 That he/she is the \_\_\_\_\_ for Will and Andra Edwards in the above-entitled  
7 matter; that he/she has read the foregoing answers and responses to Respondent Department of  
8 Ecology's First Interrogatories and Requests for Production of Documents, knows the contents  
9 thereof, and believes the same to be true.

10 By: \_\_\_\_\_  
11 for \_\_\_\_\_

12 Signed or attested before me on this \_\_\_\_\_ day of \_\_\_\_\_, 2022.

13 \_\_\_\_\_  
14 NOTARY PUBLIC, in and for the  
15 State of Washington.  
16 My commission expires: \_\_\_\_\_

17 **ATTORNEY CERTIFICATION**

18 The undersigned attorney for Will and Andra Edwards has read the foregoing answers  
19 to Respondent Department of Ecology's First Set of Interrogatories and Requests for  
20 Production of Documents and certifies that they are in compliance with CR 26(g).

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

22 \_\_\_\_\_  
23 TONI MEACHAM  
24 Attorney for Appellants Will and Andra Edwards  
25  
26

1  
2  
3 **CERTIFICATE OF SERVICE**

4 I certify that on the 31st day of January 2022 I caused to be served Respondent  
5 *Department of Ecology's First Set of Interrogatories and Requests for Production of*  
6 *Documents* in the above-captioned matter upon the parties herein as indicated below:

7 Toni Meacham [ ] U.S. Mail  
8 Attorney at Law [X] Email  
9 1420 Scootene Road toniperson@rocketmai  
10 Connell, Washington l.com  
11 99326

12 the foregoing being the last known address.

13 I certify under penalty of perjury under the laws of the State of Washington that the  
14 foregoing is true and correct.

15 DATED this 31st day of January 2022 in Olympia, Washington.

16  
17 \_\_\_\_\_  
18 CYNTHIA A. MEYER, Legal Assistant  
19  
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