

1  
2  
3  
4  
5  
6  
7  
8 IN THE SUPERIOR COURT OF WASHINGTON FOR BENTON COUNTY  
9 STATE OF WASHINGTON,

10 Plaintiff,

11 v.

12 ARLENE'S FLOWERS, INC., d/b/a  
13 ARLENE'S FLOWERS AND GIFTS; and  
14 BARRONELLE STUTZMAN,

15 Defendants.

16 ROBERT INGERSOLL AND CURT FREED,

17 Plaintiffs,

18 V.  
19

20 ARLENE'S FLOWERS, INC., D/B/A  
21 ARLENE'S FLOWERS AND GIFTS; AND  
22 BARRONELLE STUTZMAN,

23 Defendants.

No. 13-2-00871-5

(Consolidated with No. 13-2-00953-3)

**DECLARATION OF CURT FREED  
IN SUPPORT OF OPPOSITION TO  
DEFENDANTS' MOTION FOR  
PARTIAL SUMMARY JUDGMENT ON  
CPA CLAIM BY INGERSOLL AND  
FREED**

24 Pursuant to RCW 9A.72.085, the undersigned hereby declares that:

25 1. I am one of the plaintiffs in this action. I have personal knowledge of the facts  
26 set forth in this declaration and am fully competent to testify in this matter.  
27  
28

*Declaration of Curt Freed - 1*

**HILLIS CLARK MARTIN & PETERSON P.S.**  
1221 Second Avenue, Suite 500  
Seattle, Washington 98101-2925  
Telephone: (206) 623-1745  
Facsimile: (206) 623-7789

1           2.       From 1994 until 2013, I was employed at Columbia Basin College in various  
2 capacities, including faculty member, administrator, dean, and most recently as Vice President  
3 of Instruction.  
4

5           3.       I am currently completing a Ph.D. at Washington State University in higher  
6 education management.  
7

8           4.       I am a gay man, and I have been in a romantic relationship with plaintiff  
9 Robert Ingersoll since 2004.  
10

11          5.       I proposed marriage to Robert in December 2012 and we made plans to marry  
12 on our anniversary in September 2013.  
13

14          6.       Robert and I planned to buy flowers for the wedding from Arlene's Flowers.  
15 We had purchased flowers from Arlene's Flowers many times over the years, and we  
16 considered Arlene's Flowers to be our florist. I had ordered flowers from Arlene's Flowers  
17 for special occasions over the years, including birthdays, Valentine's Day, and Mother's Day.  
18

19          7.       After Arlene's Flowers and Barronelle Stutzman refused to sell Robert and me  
20 flowers for our wedding, we needed to make alternative arrangements to buy flowers. The  
21 refusal caused us to postpone a big celebration and we decided to host a small wedding  
22 ceremony at our home instead. After taking time to consider our options, we decided to buy  
23 flowers from two other sources: Carol Travis and Lucky Flowers in Kennewick. Robert  
24 made most of the arrangements with Carol. The day before our wedding, I drove in my car  
25 from our home in Kennewick to Lucky Flowers and bought a large arrangement for our  
26 wedding. I had heard that Lucky Flowers was supportive of the gay community in the Tri-  
27 Cities.  
28

*Declaration of Curt Freed - 2*

**HILLIS CLARK MARTIN & PETERSON P.S.**  
1221 Second Avenue, Suite 500  
Seattle, Washington 98101-2925  
Telephone: (206) 623-1745  
Facsimile: (206) 623-7789

8. I own my car and buy the gas that is consumed by driving my car.

I hereby declare, under penalty of perjury under the laws of the State of Washington,  
that the foregoing is true and correct.

DATED this 23<sup>rd</sup> day of September, 2013 at Kennewick, Washington.

  
CURT FREED

ND: 99994.022 4814-9148-5718v1