

THE HONORABLE THOMAS O. RICE

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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON

ROGELIO MONTES and MATEO
ARTEAGA,

Plaintiffs,

vs.

CITY OF YAKIMA; MICAH
CAWLEY, in his official capacity as
Mayor of Yakima; and MAUREEN
ADKISON, SARA BRISTOL, KATHY
COFFEY, RICK ENSEY, DAVE ETTL,
and BILL LOVER, in their official
capacity as members of the Yakima City
Council,

Defendants.

NO. 12-cv-3108-TOR

DECLARATION OF JOHN A.
SAFARLI IN SUPPORT OF
DEFENDANTS' SUMMARY
JUDGMENT MOTION

1 I, John A. Safarli, hereby state and declare as follows:

2 1. I represent Defendants in this matter and have personal knowledge of
3 the matters stated herein.

4 2. Attached to my declaration as **Exhibit A** is a true and correct copy of
5 the Yakima City Charter effective August 20, 2013.

6 3. Attached to my declaration as **Exhibit B** is a true and correct copy of
7 an amendment to the Yakima City Charter signed December 6, 1976.

8 4. Attached to my declaration as **Exhibit C** is a true and correct copy of
9 the Declaration of Plaintiffs' expert William Cooper dated February 1, 2013.

10 5. Attached to my declaration as **Exhibit D** is a true and correct copy of
11 letter correspondence from Plaintiffs' counsel Ben Stafford dated February 21,
12 2013.

13 6. Attached to my declaration as **Exhibit E** is a true and correct copy of
14 the expertreport of Defendants' expert Dr. Peter Morrison.

15 7. Attached to my declaration as **Exhibit F** is a true and correct copy of
16 the Supplemental Declaration of Plaintiffs' expert William Cooper dated April 19,
17 2013.

18 8. Attached to my declaration as **Exhibit G** is a true and correct copy
19 of email correspondence from Plaintiffs' counsel Abha Khanna dated May 1,
20 2013, and an attachment to that email.

21 9. Attached to my declaration as **Exhibit H** is a true and correct copy
22 of the deposition transcript of Plaintiffs' expert William Cooper.
23

CERTIFICATE OF SERVICE

The undersigned hereby certifies under penalty of perjury under the laws of the State of Washington, that on the date noted below, a true and correct copy of the foregoing was delivered and/or transmitted in the manner(s) noted below:

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DATED this 1st day of July, 2014

s/ John A. Safarli
John A. Safarli, WSBA No. 44056