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**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WASHINGTON
AT SPOKANE**

ARLENE’S FLOWERS, INC. d/b/a
ARLENE’S FLOWERS AND GIFTS,
and
BARRONELLE STUTZMAN,
Plaintiffs,

v.

ROBERT W. FERGUSON, in his
official capacity as ATTORNEY
GENERAL for the STATE OF
WASHINGTON,

Defendant.

NO. 2:13-cv-05094-RMP

Declaration of Nickole Perry in
support of Motion for Summary
Judgment

1 fiancé and me a lot of questions about how we met, our likes and dislikes,
2 things we appreciated about each other, and unique aspect of our
3 relationship and personalities. I had the sense that Barronelle felt it was
4 important to get to know us well so that she could design arrangements that
5 celebrated our marriage. Honestly, I was surprised at how many questions
6 she asked and how engaged she was in learning about us a couple and our
7 wedding plans. When we left, there was no question that Barronelle was
8 really partnering with us to create a beautiful occasion.
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12 1.5 When I came to Arlene's Flowers, I saw a beautiful bridal
13 bouquet in a picture in the wedding room, and I knew I wanted something
14 similar. I loved the distinctive look Arlene's Flowers had created for the
15 bride in the picture, and I knew I was in good hands asking Barronelle to use
16 her skills and creativity to arrange the flowers for my wedding.
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18 1.6 In that first meeting, I told Barronelle that my wedding colors
19 were dark wine, green, and cream, and she recommended flower options to
20 go along with these. When I inspected the flowers the day before my
21 wedding, I loved every bit of Barronelle's work. She had listened to all of
22 my requests and had creatively and beautifully designed all of the flower
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1 arrangements, from my bouquet, to Aunt Kel's corsage, to the tall floral
2 centerpieces on the reception tables.

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4 1.7 For the ceremony alone, Barronelle came up with thirteen
5 different bouquets, boutonnieres, and corsages to outfit thirty-two people.
6 From the flower girl to the minister, everyone's flowers were beautiful and
7 exactly what I wanted.
8

9 1.8 For the reception, Barronelle created twenty tall table
10 centerpieces, cake table flower arrangements, large flower arrangements to
11 sit at the base of a gazebo, and another bouquet for me to throw. She also
12 acquired accent ferns and pillars and placed them around the large reception
13 venue. Everything was put together beautifully, and Barronelle made sure all
14 of the flowers were set up properly at the venue.
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17 1.9 Barronelle was prepared for her role on my wedding day. She
18 had come to the church with the delivery trucks to set up the flowers two
19 hours before the ceremony. She also set up all of the flowers at the reception
20 venue. Before the wedding, she helped all of the bridesmaids and
21 groomsmen to get their flowers pinned and ready, and she was prepared for
22 a floral mishap too. When my little brother destroyed his boutonniere before
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1 the wedding even started, Barronelle was ready with another one.

2 1.10 Barronelle was a fantastic florist, but she was more than that to
3 me on my wedding day. She was a calming presence. She helped my
4 bridesmaids and me to relax and laugh a little before we got in line to enter
5 the church sanctuary. Somehow I had a stain on my wedding dress, and
6 Barronelle even helped me clean it off just before I walked down the aisle.
7 She kept everything running on time, too. Throughout the day, Barronelle
8 was available to check on all of the flowers on tables, as I would expect a
9 florist to do. She went above and beyond by talking to the guests, helping
10 them feel comfortable, and even calming my nervous parents! Barronelle
11 also helped at the reception.
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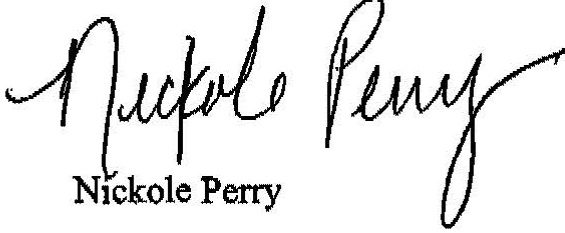
16 1.11 I don't know what I would have done without Barronelle on my
17 wedding day. We received many questions about who arranged the flowers
18 at the ceremony and reception. I suspected that selecting my florist was an
19 important decision, but I had no idea the important role Barronelle would
20 play in making the day beautiful and run smoothly, and I know she worked
21 hard to make sure I experienced love and happiness that day. She truly
22 invested herself and her artistic skills in designing the floral arrangements,
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but also in ensuring the wedding was a successful celebration of our union as
man and wife.

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1 I declare under the penalty of perjury that the foregoing is true and
2 correct to the best of my knowledge. Executed August 26, 2014.

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6 Nickole Perry

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