

THE HONORABLE LEROY MCCULLOUGH

SUPERIOR COURT OF THE STATE OF WASHINGTON
FOR KING COUNTY

WASHINGTON ELECTION INTEGRITY
COALITION UNITED, a Washington State
Nonprofit Corporation; DOUG BASLER;
HOWARD FERGUSON; DIANA BASS;
TIMOFEY SAMOYLENKO; MARY
HALLOWELL; SAMANTHA BUCARI;
RONALD STEWART; LYDIA ZIBIN;
CATHERINE DODSON,

Plaintiffs,

v.

JULIE WISE, King County Director of
Elections; KING COUNTY, and DOES 1-30,
inclusive,

Defendants,

and

WASHINGTON STATE DEMOCRATIC
CENTRAL COMMITTEE,

Proposed Intervenor
Defendant.

No. 21-2-12603-7 KNT

DECLARATION OF KEVIN J.
HAMILTON IN SUPPORT OF THE
WASHINGTON STATE
DEMOCRATIC CENTRAL
COMMITTEE'S MOTION TO
INTERVENE

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DECLARATION OF KEVIN J. HAMILTON

I, Kevin J. Hamilton, do hereby declare:

1. I am counsel for Proposed Intervenors the Washington State Democratic Central Committee (“WSDCC”) in this matter and am fully familiar with all facts declared herein.

2. Attached as Exhibit A is WSDCC’s Proposed Answer to the Complaint (to ensure compliance with CR 24(c)).

3. Attached as Exhibit B is a declaration from WSDCC Chair Tina Podlodowski.

4. Attached as Exhibit C is WSDCC’s Proposed Motion to Dismiss, which WSDCC seeks to file if it is granted intervention.

5. Attached as Exhibit D is a true and correct copy of the Lincoln County Superior Court’s February 14, 2022 Order granting WSDCC intervention as of right in that action.

6. Attached as Exhibit E is a true and correct copy of the Lincoln County Superior Court’s March 28, 2022 Order dismissing plaintiffs’ action.

7. Attached as Exhibit F is a true and correct copy of the Lincoln County Superior Court’s April 22, 2022 Order directing plaintiffs to pay sanctions.

8. Attached as Exhibit G is a true and correct copy of the Franklin County Superior Court’s December 13, 2021 Order dismissing plaintiffs’ action.

9. Attached as Exhibit H is a true and correct copy of the Washington Election Integrity Coalition United’s Petition to the Washington Supreme Court, filed October 4, 2021.

10. Attached as Exhibit I is a true and correct copy of the January 4, 2022 Order dismissing the Washington Election Integrity Coalition United’s Petition to the Washington Supreme Court.

1 11. Attached as Exhibit J is a true and correct copy of the May 17, 2022 Order
2
3 imposing sanctions on the Washington Election Integrity Coalition.

4 12. Attached as Exhibit K is a true and correct copy of the June 3, 2022 letter to
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6 the Office of Disciplinary Counsel of the Washington State Bar association from
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8 Washington's Solicitor General Noah Purcell.
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12 **I declare under penalty of perjury that the foregoing is true and correct.**
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16 Dated: March 30, 2023

/s Kevin J. Hamilton

Kevin J. Hamilton, WSBA No. 15648
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*Attorney for the Washington State Democratic
Central Committee*