THE HONORABLE LEROY MCCULLOUGH 1 Hearing Date: July 12, 2023 Without Oral Argument 2 3 4 5 6 7 SUPERIOR COURT OF WASHINGTON 8 **COUNTY OF KING** 9 10 Washington Election Integrity Coalition Case No. 21-2-12603-7 KNT United, et. al, 11 Plaintiffs, DECLARATION OF VIRGINIA P. SHOGREN v. 12 IN SUPPORT OF MOTION FOR RECONSIDERATION Julie Wise, et al., 13 Defendants, CR 59(a)(7) 14 and 15 Washington State Democratic Central Committee, 16 Intervenor Defendant; 17 Julie Wise, King County, 18 Counter-claimants, 19 20 Washington Election Integrity Coalition United. 21 Counterclaim Defendant. 22 23 24 I, Virginia P. Shogren, do hereby declare: 25 1. I am counsel for Plaintiff/Counterclaim-Defendant Washington Election Integrity Coa-

DECLARATION OF VIRGINIA P. SHOGREN IN SUPPORT OF MOTION FOR RECONSIDERATION

26

27

28

Virginia P. Shogren, P.C. 961 Oak Court Sequim WA 98382 360-461-5551

lition United ("WEiCU") in this matter and am fully familiar with all facts declared herein.

- 2. On September 22, 2021, in its capacity as a public records requestor (RCW 42.56), WEiCU along with individual plaintiffs filed a Verified Complaint in King County Superior Court, Case No. 21-2-12603-7 KNT. Cause of Action XVI of the Verified Complaint incorporates by reference paragraphs 1 through 48 of the complaint and was brought by WEiCU under, *inter alia*, the Public Records Act ("PRA") RCW 42.56.030 and RCW 42.56.550.
- 3. On October 13, 2021, the matter was removed by the Defendants to U.S. District Court, Western District of Washington. On October 17, 2021, I filed a Notice of Appearance for WEiCU in the federal action, a true and correct copy of which is attached hereto as Exhibit "A".
- 4. On October 22, 2021, WEiCU moved the District Court to sever and remand the action. Almost a year later, on September 30, 2022, WEiCU's motion to remand was granted.
- 5. On October 24, 2022, the Superior Court was provided official notification of the remand. On October 26, 2022, I filed a second Notice of Appearance for WEiCU in the remanded action, a true and correct copy of which is attached hereto as Exhibit "B".
- 6. In its Motion for Summary Judgment, Defendants separately moved the Court to strike the PRA cause of action on grounds that WEiCU originally signed the complaint. Defendants requested dismissal of the cause of action under Civil Rule 11(a).
- 7. On June 5, 2023, this Court stated that a "[c]omplaint filed by a corporate body must bear the signature of an attorney, and that's specifically laid out in CR 11. And to date, no such signature is attached to the complaint." June 5, 2023 Oral Decision, p. 19, ll. 22-25. This Court granted "[t]he defense motion to strike the pleadings. . . ." *Id*, p. 20, l. 25- p. 21, l. 1.
- 8. On June 15, 2023, the Court issued an Order Denying Plaintiff WEICU's Motion for Declaratory Judgment on the Meaning and Application of RCW 29A.08.161, an Order Denying Plaintiff WEICU's Motion to Show Cause Re Public Records Request, and an Order Granting De-

1	fendants/Counterclaimants Julie Wise and King County's Motion for Summary Judgment ("Orders").						
2	The Court's rulings with respect to CR 11 in the Orders are as follows:						
3	In the alternative, the Court finds that the [Public Records Act] PRA cause of action						
4	set forth in the verified complaint filed in this case failed to comply with CR 11. A complaint filed by a corporate body must bear the signature of a licensed attorney. In						
5	this matter, the verified complaint was not signed by an attorney.						
6	Orders: Declaratory Judgment p. 5, ll. 8-11, Show Cause p. 5, ll. 10-13, Motion for Summary Judg-						
7	ment p. 6, ll. 7-10.						
8	I declare under penalty of perjury that the foregoing is true and correct.						
9							
10	Dated: June 21, 2023						
11	Cigina P. Shogan						
12	Virginia P. Shogren, Esq.						
13							
14							
15							
16							
17							
18							
19							
20							
21							
22							
23							
24							
25							
26							

Virginia P. Shogren, P.C. 961 Oak Court Sequim WA 98382 360-461-5551

27

Exhibit A

HONORABLE JOHN C. COUGHENOUR

_-

UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF WASHINGTON AT SEATTLE

WASHINGTON ELECTION INTEGRITY)	Case No. 2:21-cv-01394-JCC
COALITION UNITED, a Washington State)	
Nonprofit Corporation; DOUG BASLER;)	
HOWARD FERGUSON; DIANA BASS;)	
TIMOFEY SAMOYLENKO; AMY)	NOTICE OF APPEARANCE
BEHOPE; MARY HALLOWELL;)	
SAMANTHA BUCARI; RONALD)	
STEWART; LYDIA ZIBIN; CATHERINE)	
DODSON,)	
)	
)	
Plaintiffs,)	
)	
v.)	
)	
)	
JULIE WISE, Director of King County)	
Elections; KING COUNTY, and DOES)	
1-30, inclusive,)	
, ,)	
Defendants.)	
	ĺ	

With full reservation of rights, and without waiver or submission to the personal, subject matter jurisdiction and/or venue of this Court, notice is hereby given of entry of the undersigned

NOTICE OF APPEARANCE

1	as counsel for Washington Election Integrity Coalition United, a Washington State Nonprofit			
2	Corporation, in the above-entitled action. Pursuant to FRCP 5, all further notice and copies of			
3	pleadings, paper and other material relevant to this action should be directed to and served upon			
5	Virginia P. Shogren Virginia P. Shogren, P.C.			
6	WEiCUattorney@protonmail.com 961 W. Oak Court			
7	Sequim, WA 98382			
8 9	Dated: October 17, 2021 Lyina P. Shogun			
10	Virginia P. Shogren WA State Bar No. 33939			
11				
12				
13				
14				
15				
16				
17				
18				
19				
20				
21				
22				
23				
24				
25				
26				
27				

1 CERTIFICATE OF SERVICE 2 I hereby certify that on October 17, 2021, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the 3 following counsel of record: 4 Ann M. Summers 5 David J.W. Hackett Mari Isaacson 6 7 And I hereby certify that I caused to be served the document via email provided by the following parties who are non CM/ECF participants: 8 Doug Basler Howard Fersugon 10 Diana Bass Timofey Samoylenko 11 Amy Behope Mary Hallowell 12 Samantha Bucari 13 **Ronald Stewart** Lydia Zibin 14 Catherine Dodson 15 16 Dated: October 17, 2021 s/ Virginia P. Shogren Virginia P. Shogren 17 Virginia P. Shogren, P.C. 961 W. Oak Court 18 **Sequim, WA 98382** 19 360-461-5551 20 21 22 23 24

25

26

27

Exhibit B

HONORABLE LEROY MCCULLOUGH

NOTICE OF APPEARANCE

SUPERIOR COURT FOR THE STATE OF WASHINGTON

KING COUNTY

WASHINGTON ELECTION INTEGRITY)	Case No. 21-2-12603-7 KNT
COALITION UNITED, a Washington State	e)	
Nonprofit Corporation; DOUG BASLER;)	
HOWARD FERGUSON; DIANA BASS;)	
TIMOFEY SAMOYLENKO; AMY)	NOTICE OF APPEARANCE
BEHOPE; MARY HALLOWELL;)	
SAMANTHA BUCARI; RONALD)	
STEWART; LYDIA ZIBIN; CATHERINE)	(Clerk's Action Required)
DODSON,		
)	
)	
Plaintiffs,)	
)	
V.)	
)	
)	
JULIE WISE, Director of King County)	
Elections; KING COUNTY, and DOES)	
1-30, inclusive,)	
)	
Defendants)	

Please be advised that the undersigned hereby appears as attorney of record for Plaintiff Washington Election Integrity Coalition United, a Washington State Nonprofit Corporation, in the above-entitled action, and hereby requests that all further notice and copies of pleadings,

1	paper and other material relevant to this action be served upon the undersigned attorney at the			
2				
3	address below:			
4	Virginia P. Shogren Virginia P. Shogren, P.C.			
5	961 W. Oak Court			
6	Sequim, WA 98382 vshogren@gmail.com			
7	360-461-5551			
8	2			
9	Dated: October 26, 2022 Lising L. Shogan			
10	Virginia P. Shogren WA State Bar No. 33939			
11				
12				
13				
14				
15				
16				
17				
18				
19				
20				
21				
22				
23				
24				
25				
26				

1	DECLARATION OF SERVICE				
2 3	I declare under penalty of perjury under the laws of the State of Washington that on October 26, 2022, a true and correct copy of the foregoing document was served upon the particular transfer of the state of Washington that on				
4	listed below via the method indicated:				
5	Counsel for Defendants: Ann M. Summers				
6	Via email: ann.summers@kingcounty.gov				
7	David J.W. Hackett Via email: david.hackett@kingcounty.gov				
8	Mari Isaacson				
	Via email: mari.isaacson@kingcounty.gov				
9					
10	Counsel for Proposed Intervenor: Kevin Hamilton				
11	Via email: KHamilton@perkinscoie.com				
12	Reina Almon-Griffin				
13	Via email: RAlmon-Griffin@perkinscoie.com Amanda Beane				
14	Via email: ABeane@perkinscoie.com				
15	And I hereby certify that I caused to be served the document via email provided by the following				
16	pro se plaintiffs:				
17	Doug Basler Howard Fersugon				
18	Diana Bass				
19	Timofey Samoylenko				
	Mary Hallowell Samantha Bucari				
20	Ronald Stewart				
21	Lydia Zibin Catherine Dodson				
22					
23	Dated: October 26, 2022 s/ Virginia P. Shogren				
24	Virginia P. Shogren				
25	Virginia P. Shogren, P.C. 961 W. Oak Court				
26	Sequim, WA 98382 360-461-5551				
27	300-401-3331				