

1 2. On September 22, 2021, in its capacity as a public records requestor (RCW 42.56),
2 WEiCU along with individual plaintiffs filed a Verified Complaint in King County Superior Court,
3 Case No. 21-2-12603-7 KNT. Cause of Action XVI of the Verified Complaint incorporates by refer-
4 ence paragraphs 1 through 48 of the complaint and was brought by WEiCU under, *inter alia*, the Pub-
5 lic Records Act (“PRA”) RCW 42.56.030 and RCW 42.56.550.

6 3. On October 13, 2021, the matter was removed by the Defendants to U.S. District
7 Court, Western District of Washington. On October 17, 2021, I filed a Notice of Appearance for
8 WEiCU in the federal action, a true and correct copy of which is attached hereto as Exhibit “A”.

9 4. On October 22, 2021, WEiCU moved the District Court to sever and remand the ac-
10 tion. Almost a year later, on September 30, 2022, WEiCU’s motion to remand was granted.
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12 5. On October 24, 2022, the Superior Court was provided official notification of the re-
13 mand. On October 26, 2022, I filed a second Notice of Appearance for WEiCU in the remanded ac-
14 tion, a true and correct copy of which is attached hereto as Exhibit “B”.
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16 6. In its Motion for Summary Judgment, Defendants separately moved the Court to strike
17 the PRA cause of action on grounds that WEiCU originally signed the complaint. Defendants re-
18 quested dismissal of the cause of action under Civil Rule 11(a).
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20 7. On June 5, 2023, this Court stated that a “[c]omplaint filed by a corporate body must
21 bear the signature of an attorney, and that’s specifically laid out in CR 11. And to date, no such signa-
22 ture is attached to the complaint.” June 5, 2023 Oral Decision, p. 19, ll. 22-25. This Court granted
23 “[t]he defense motion to strike the pleadings. . . .” *Id*, p. 20, l. 25- p. 21, l. 1.

24 8. On June 15, 2023, the Court issued an Order Denying Plaintiff WEiCU’s Motion for
25 Declaratory Judgment on the Meaning and Application of RCW 29A.08.161, an Order Denying
26 Plaintiff WEiCU’s Motion to Show Cause Re Public Records Request, and an Order Granting De-
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1 defendants/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
5 complaint filed by a corporate body must bear the signature of a licensed attorney. In
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.

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10 Dated: June 21, 2023

11 
12 Virginia P. Shogren, Esq.

Exhibit A

**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.)	
)	

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

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:
4

5 Virginia P. Shogren
6 Virginia P. Shogren, P.C.
7 WEiCUattorney@protonmail.com
8 961 W. Oak Court
9 Sequim, WA 98382

10 Dated: October 17, 2021



11 Virginia P. Shogren
12 WA State Bar No. 33939
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1 CERTIFICATE OF SERVICE

2 I hereby certify that on October 17, 2021, I electronically filed the foregoing with the
3 Clerk of the Court using the CM/ECF system which will send notification of such filing to the
4 following counsel of record:

5 Ann M. Summers
6 David J.W. Hackett
7 Mari Isaacson

8 And I hereby certify that I caused to be served the document via email provided by the following
9 parties who are non CM/ECF participants:

10 Doug Basler
11 Howard Fersugon
12 Diana Bass
13 Timofey Samoylenko
14 Amy Behope
15 Mary Hallowell
16 Samantha Bucari
17 Ronald Stewart
18 Lydia Zibin
19 Catherine Dodson

20 Dated: October 17, 2021

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

Exhibit B

**SUPERIOR COURT FOR THE STATE OF WASHINGTON
KING COUNTY**

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

Case No. 21-2-12603-7 KNT

NOTICE OF APPEARANCE

(Clerk’s Action Required)

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 address below:

3 Virginia P. Shogren
4 Virginia P. Shogren, P.C.
5 961 W. Oak Court
6 Sequim, WA 98382
7 vshogren@gmail.com
8 360-461-5551

9 Dated: October 26, 2022



10 Virginia P. Shogren
11 WA State Bar No. 33939

