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HON. KATHERINE M. STOLZ

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FILED BY FAX  
IN COUNTY CLERK'S OFFICE  
JUL 29 2002 P.M.  
PIERCE COUNTY, WASHINGTON  
BOB SAN SOUCIE COUNTY CLERK  
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IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON  
IN AND FOR THE COUNTY OF PIERCE

JOSEPH J. KIRBY and DEBORAH A. )  
KIRBY, husband and wife, )  
Plaintiffs, )

No. 99 2 13911 4

vs. )  
THE CITY OF TACOMA, a municipal )  
corporation; RAY CORPUZ and )  
"JANE DOE" CORPUZ, husband and )  
wife; PHILIP ARREOLA and "JANE )  
DOE" ARREOLA, husband and )  
wife; WILLIAM WOODARD and )  
CATHERINE WOODARD, husband and )  
wife; RAYMOND ROBERTS and "JANE )  
DOE" ROBERTS, husband and wife; )  
DAVID BRAME and "JANE DOE" )  
BRAME, husband and wife; and )  
JAMES HAIRSTON and "JANE DOE" )  
HAIRSTON, husband and wife, )  
Defendants. )

PLAINTIFFS' DISCLOSURE  
OF PRIMARY WITNESSES

- 1. Joseph Kirby  
11808 Seminole Road SW  
Tacoma, WA 98499

Joseph Kirby is a plaintiff in this cause of action.

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5316 Orchard St. W.  
Tacoma, WA 98467-3633  
(253) 472-6000

1 2. Deborah A. Kirby  
 2 11808 Seminole Road SW  
 3 Tacoma, WA 98499

4 Deborah Kirby is a plaintiff in this cause of action.

5 3. Ray Corpuz  
 6 City of Tacoma  
 7 Tacoma, WA

8 Ray Corpuz is City Manager of Tacoma and is a defendant  
 9 in this cause of action.

10 4. Philip Arreola

11 Philip Arreola is a former Chief of Police in Tacoma and  
 12 is a defendant in this cause of action.

13 5. William R. Woodard  
 14 Tacoma Police Department

15 William Woodard is Assistant Chief of Police and is a  
 16 defendant in this cause of action.

17 6. Raymond Roberts  
 18 Tacoma Police Department

19 Raymond Roberts is Assistant Chief of the Tacoma Police  
 20 Department and is a defendant in this cause of action.

21 7. David Brame  
 22 Tacoma Police Department

23 David Brame is an employee of the Tacoma Police  
 24 Department and is a defendant in this cause of action.

25 8. James Hairston  
 Tacoma Police Department

James Hairston is the Chief of Police of Tacoma and is a  
 defendant in this cause of action.

The majority of the following witnesses are employees of  
 the Tacoma Police Department. Residential addresses and  
 telephone numbers are known to defendants:

9. Joseph A. Bundy  
 Police Patrol Officer # 158

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1 Joseph A. Bundy is an employee of the Tacoma Police  
2 Department and has knowledge of the alleged facts in this  
incident.

3 10. Michael J. Darland  
4 Deputy Chief #212

5 Michael J. Darland is an employee of the Tacoma Police  
6 Department and has knowledge of the alleged facts in this  
7 incident.

8 11. Peter M. Habib  
9 Sergeant #026

10 Peter M. Habib is an employee of the Tacoma Police  
11 Department and has knowledge of the alleged facts in this  
12 incident.

13 12. Steve Kirby  
14 address to be provided

15 Mr. Kirby is a City Councilman. He has knowledge of the  
16 alleged facts in this incident.

17 13. Charles E. Meinema  
18 Captain #238

19 Charles E. Meinema is a Police Captain and formerly  
20 Assistant Chief of Tacoma Police and has knowledge of the  
21 alleged facts in this incident.

22 14. David T. Olsen  
23 Captain (Retired)

24 David T. Olsen is a former employee of the Tacoma Police  
25 Department and has knowledge of the alleged facts in this  
incident.

15. Donald L. Ramsdell  
Lieutenant #347

Donald L. Ramsdell is an employee of the Tacoma Police  
Department and has knowledge of the alleged facts in this  
incident.

16. Ronald M. Rasmussen  
Police Patrol Officer #146

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1 Ronald M. Rasmussen is an employee of the Tacoma Police  
2 Department and has knowledge of the alleged facts in this  
incident.

3 17. Zachary T. Kirby  
4 11808 Seminole Rd SW  
Lakewood, WA 98499

5 Zachary Kirby is the plaintiffs' son and will testify  
6 regarding his observations of the effects of the incident on  
his parents.

7  
8 18. Lara N. Kirby  
11808 Seminole Road SW  
Lakewood, WA 98499

9  
10 Lara Kirby is the plaintiffs' daughter. She will testify  
regarding her observations of the effects of the incident on  
her parents.

11  
12 19. Jolin Lowry  
PO Box 112496  
Tacoma, WA 98411

13  
14 Jolin Lowry is a friend of plaintiffs and can testify  
regarding her observations of the effects of the incident on  
the lives of the plaintiffs.

15  
16 20. D. P. Van Blaricom  
839 91st Lane NE  
17 Bellevue, WA 98004  
425-453-0082

18  
19 Mr. Van Blaricom is a Police Practices expert. A copy of  
his curriculum vitae is attached. He will testify as an expert  
20 witness regarding his knowledge of Police Department procedures  
regarding promotions, admonishments, retaliatory activity  
21 towards union members, and other issues related to the  
discriminatory treatment of plaintiff by the Tacoma Police  
Department and its actors, agents and employees. Further, Mr.  
22 Van Blaricom will testify to other department procedures  
including, but not limited to, an opinion on the specific  
23 treatment of plaintiff.

24 Mr. Van Blaricom bases his opinions on his experience as  
well as specific review of the depositions, interrogatories,  
25

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1 and requests for production elicited, and to be elicited,  
2 through the discovery process.

3 Plaintiffs reserve the right to supplement Mr. Van  
4 Blaricom's opinions as they are refined and developed.

5 21. Philip G. Lindsay, M.D.  
6 1101 Madison Street, Suite 1260  
7 Seattle, WA 98104

8 Doctor Lindsay is a physician specializing in Internal  
9 Medicine and Psychiatry. A copy of Doctor Lindsay's curriculum  
10 vitae is attached. Doctor Lindsay has the education,  
11 experience and knowledge to testify regarding his evaluation  
12 and treatment of Joseph Kirby as it relates to the events in  
13 this incident. Plaintiffs reserve the right to supplement Dr.  
14 Lindsay's opinions as they are refined and developed.

15 Dr. Lindsay's testimony is based upon his experience and  
16 expertise in psychiatry and his treatment and care of Mr.  
17 Kirby.

18 22. Douglas Robinson, M.D.  
19 Montlake Professional Building  
20 2200 24th Avenue East  
21 Seattle, WA 98112

22 Doctor Robinson is a physician. He has the education,  
23 training and experience to testify regarding his independent  
24 medical examination of plaintiff on or around 5/24/99.

25 Plaintiffs will supplement his curriculum vitae upon  
request by the defendants as it is plaintiffs' understanding  
that the medical examinations were conducted for and on behalf  
of the defendant Tacoma Police Department.

26 23. Dr. Barryman Edwards  
27 address to be provided

28 Dr. Edwards is a physician. He has the education,  
29 training and experience to testify regarding his independent  
30 medical examination of Joseph Kirby on December 12/2/99 and  
31 12/9/99.

32 Plaintiffs will supplement his curriculum vitae upon  
33 request by the defendants as it is plaintiffs' understanding  
34 that the medical examinations were conducted for and on behalf  
35 of the defendant Tacoma Police Department.

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1 24. Jerome Rad, M.D.  
 2 Allenmore Medical Center  
 3 South 19th & Union, Ste A206  
 4 Tacoma, WA

5 Doctor Rad is a physician. He has the education,  
 6 training and experience to testify regarding his treatment of  
 7 Joseph Kirby and the effect the events of this incident have  
 8 had on his health. Plaintiffs will supplement his curriculum  
 9 vitae upon receipt.

10 25. Gary L. Hendricksen, M.D.  
 11 Allenmore Hospital  
 12 1901 S. Union Ave.  
 13 Tacoma, WA 98411

14 Doctor Hendricksen is a physician specializing in  
 15 occupational medicine. He has the education, training and  
 16 experience to testify regarding his findings as a result of his  
 17 examination of Joseph Kirby for the City of Tacoma. Plaintiffs  
 18 will supplement his curriculum vitae upon receipt.

19 RESERVATION OF RIGHTS

20 These plaintiffs reserve the right to call, at trial, any  
 21 and all lay witnesses and expert witnesses disclosed or  
 22 identified by any party to this action. Plaintiffs further  
 23 reserve the right to call at trial any and all other parties to  
 24 this action, whether or not disclosed or identified by any  
 25 other party as a lay or expert witness, including all witnesses  
 discovered through ongoing discovery. These plaintiffs reserve  
 the right to elicit expert testimony from any and all witnesses  
 to the extent permitted by the applicable rules of evidence.

Plaintiffs reserve the right to supplement with those  
 witnesses identified and to be identified by defendant and with  
 additional witnesses identified through discovery and  
 investigation.

DATED this 22 day of July 2002.

MESSINA BULZOMI

By John L. Messina  
 JOHN L. MESSINA 4440  
 Attorneys for Plaintiffs

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