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PIERCE COUNTY, WASHINGTON
BOB SANSON COUNTY CLERK
BY _____ DEPUTY

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,

v.

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.

No. 99-2-13911-4

AFFIDAVIT OF MARY BROWN IN
SUPPORT OF DEFENDANTS'
MOTION FOR PARTIAL
SUMMARY JUDGMENT TO
DISMISS PHILIP ARREOLA,
DAVID BRAME AND RAYMOND
ROBERTS

NOTED FOR:
December 13, 2002

ASSIGNED:
Judge Katherine M. Stolz

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STATE OF WASHINGTON)
) ss.
COUNTY OF PIERCE)

MARY BROWN, being first duly sworn on oath, deposes and states as follows:

1. I am over the age of eighteen and competent to give testimony in this matter, and make this affidavit upon personal knowledge.

2. I am the Assistant Human Resources Director for the City of Tacoma, and have been so since 1990.

3. The promotional process for a Captain's position within the Tacoma Police Department is as follows: (1) a written examination is taken by interested employees; (2) an eligible list is prepared in order of score, however, everyone on that list is deemed to be qualified based on the successful passing of the written examination; (3) when there is a vacancy, the top three candidates are certified and interviewed; (4) the interview panel makes a recommendation to the Chief of Police, who then makes the ultimate promotional decision.

FURTHER YOUR AFFIANT SAYETH NAUGHT.

Mary L Brown
MARY BROWN

SUBSCRIBED and SWORN to before me this 13th day of November 2002.

M. J. Hughes
Printed Name: M. J. HUGHES
NOTARY PUBLIC in and for the State of
Washington, residing at: Tacoma
My commission expires: 11/11/03

