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IN COUNTY CLERK'S OFFICE

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PIERCE COUNTY, WASHINGTON
KEVIN STOCK, 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 SHELLEY M.
KERSLAKE IN SUPPORT OF
DEFENDANTS' REPLY
MEMORANDUM FOR PARTIAL
SUMMARY JUDGMENT TO
DISMISS PHILIP ARREOLA,
DAVID BRAME AND RAYMOND
ROBERTS

NOTED FOR:
January 10, 2003

ASSIGNED:
Judge Katherine M. Stolz

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STATE OF WASHINGTON)
) ss.
COUNTY OF PIERCE)

SHELLEY M. KERSLAKE, being first duly sworn on oath, deposes and states as follows:

1. That I am the attorney of record for the defendants in the above-captioned action, and am over the age of eighteen and competent to testify herein.

2. That attached to defendants' reply memorandum, and marked as Exhibit "1", is a true and accurate copy of the Affidavit of Mary Brown.

3. That attached to defendants' reply memorandum, and marked as Exhibit "2", is a true and accurate copy of the deposition excerpt of James Hairston, dated April 21, 2000.

4. That attached to defendants' reply memorandum, and marked as Exhibit "3", is a true and accurate copy of the deposition excerpt of Joseph Kirby, dated February 15, 2001.

5. That attached to defendants' reply memorandum, and marked as Exhibit "4", is a true and accurate copy of the documentation of verbal reprimand dated May 10, 1999.


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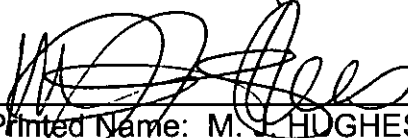
6. That attached to defendants' reply memorandum, and marked as Exhibit "5", is a true and accurate copy of the Tacoma Police Department Manual of Procedures Section 2.15.001, and the City of Tacoma's policy for electronic communication.

FURTHER YOUR AFFIANT SAYETH NAUGHT.



SHELLEY M. KERSLAKE

SUBSCRIBED and SWORN to before me this 6th day of January, 2003.



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

