



99-2-13911-4 2572403 DIS 04-28-03

HON. KAREN L. STROMBOM

2 I hereby certify that on 6/3/00 I deposited
 3 in the mails of the United States of America and/or
 4 placed with Legal Messengers and/or faxed a copy of the
 document to which this certificate is attached, for
 delivery to all counsel of record.
 5 S. De Franco
 Messina Law Firm

FILED
 IN COUNTY CLERK'S OFFICE
 A.M. JUN - 7 2000 P.M.
 PIERCE COUNTY, WASHINGTON
 BY TED RUTT, COUNTY CLERK
 DEPUTY

8 IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON

9 IN AND FOR THE COUNTY OF PIERCE

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

No. 99 2 13911 4

13 vs.)

PLAINTIFFS' DISCLOSURE
OF PRIMARY WITNESSES

14 THE CITY OF TACOMA, a municipal)
 corporation; RAY CORPUZ and)
 15 "JANE DOE" CORPUZ, husband and)
 wife; PHILIP ARREOLA and "JANE)
 16 DOE" ARREOLA, husband and)
 wife; WILLIAM WOODARD and)
 17 CATHERINE WOODARD, husband and)
 wife; RAYMOND ROBERTS and "JANE)
 18 DOE" ROBERTS, husband and wife;)
 DAVID BRAME and "JANE DOE")
 19 BRAME, husband and wife; and)
 JAMES HAIRSTON and "JANE DOE")
 20 HAIRSTON, husband and wife,)
 21 Defendants.)

22
 23
 24 COME NOW the plaintiffs, by and through their attorneys of
 25 record, and provide the following list of primary witnesses.

2 JUN - 8 2000

MESSINA • BULZOMI

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

1 | 1. Joseph Kirby
2 | 11808 Seminole Road SW
3 | Tacoma, WA 98499

4 | Joseph Kirby is a plaintiff in this cause of action.

5 | 2. Deborah A. Kirby
6 | 11808 Seminole Road SW
7 | Tacoma, WA 98499

8 | Deborah Kirby is a plaintiff in this cause of action.

9 | 3. Ray Corpuz
10 | City of Tacoma
11 | Tacoma, WA

12 | Ray Corpuz is City Manager of Tacoma and is a defendant
13 | in this cause of action.

14 | 4. Philip Arreola

15 | Philip Arreola is a former Chief of Police in Tacoma and
16 | is a defendant in this cause of action.

17 | 5. William R. Woodard
18 | Tacoma Police Department

19 | William Woodard is Assistant Chief of Police and is a
20 | defendant in this cause of action.

21 | 6. Raymond Roberts
22 | Tacoma Police Department

23 | Raymond Roberts is Assistant Chief of the Tacoma Police
24 | Department and is a defendant in this cause of action.

25 | 7. David Brame
26 | Tacoma Police Department

27 | David Brame is an employee of the Tacoma Police
28 | Department and is a defendant in this cause of action.

29 | 8. James Hairston
30 | Tacoma Police Department

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

33 |

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(253) 472-6000

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

3 9. Anthony Abuan
4 Lieutenant 4103

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

8 10. John W. Bair
9 Detective #383

10 John W. Bair is an employee of the Tacoma Police
11 Department and has knowledge of the alleged facts in this
12 incident.

13 11. Edward L. Baker
14 Detective #339

15 Edward L. Baker is an employee of the Tacoma Police
16 Department and has knowledge of the alleged facts in this
17 incident.

18 12. Jimmy D. Bass
19 Sergeant # 181

20 Jimmy D. Bass is an employee of the Tacoma Police
21 Department and has knowledge of the alleged facts in this
22 incident.

23 13. Wayne J. Beals
24 Police Patrol Officer #423

25 Wayne J. Beals is an employee of the Tacoma Police
Department and has knowledge of the alleged facts in this
incident.

Douglas R. Billman
Police Patrol Officer #309

Douglas R. Billman is an employee of the Tacoma Police
Department and has knowledge of the alleged facts in this
incident.

15. Robert R. Blystone
Sergeant #334

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1 Robert R. Blystone is a former union president and
2 employee of the Tacoma Police Department, and has knowledge of
the alleged facts in this incident.

3 16. Stuart J. Bracken
4 Police Patrol Officer #242

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

7 17. John M. Branham
8 Sergeant #368

9 John M. Branham is an employee of the Tacoma Police
10 Department and has knowledge of the alleged facts in this
incident.

11 18. Paul A. Brown
12 Police Patrol Officer #383

13 Paul A. Brown is an employee of the Tacoma Police
14 Department and has knowledge of the alleged facts in this
incident.

15 19. Barbara E. Buchholz
16 Police Secretary #932

17 Barbara E. Buchholz is an employee of the Tacoma Police
18 Department and has knowledge of the alleged facts in this
incident.

19 20. Joseph A. Bundy
20 Police Patrol Officer # 158

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

23 21. Alvis I. Calitis
24 Police Patrol Specialist #018

25 Alvis I. Calitis is an employee of the Tacoma Police
Department and has knowledge of the alleged facts in this
incident.

22. Richard N. Caron
Sergeant #375

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1 Richard N. Caron is an employee of the Tacoma Police
2 Department and has knowledge of the alleged facts in this
incident.

3 23. Rhonda J. Carter
4 Police Secretary #943

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

7 24. Norman Conaway
8 Detective #307

9 Norman Conaway is an employee of the Tacoma Police
10 Department and has knowledge of the alleged facts in this
incident.

11 25. Tracy D. Conaway
12 Police Patrol Officer #285

13 Tracy D. Conaway is an employee of the Tacoma Police
14 Department and has knowledge of the alleged facts in this
incident.

15 26. Rodney D. Cook
16 Police Patrol Officer #265

17 Rodney D. Cook is an employee of the Tacoma Police
18 Department and has knowledge of the alleged facts in this
incident.

19 27. Peter M. Cribbin
20 Sergeant #217

21 Peter M. Cribbin is an employee of the Tacoma Police
22 Department and has knowledge of the alleged facts in this
incident.

23 28. Michael J. Darland
24 Deputy Chief #212

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

26 29. Timothy A. Deccio
27 Police Patrol Officer #294

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

3 30. Mary E. Eby
4 Police Secretary #950

5 Mary E. Eby is an employee of the Tacoma Police Depart-
ment and has knowledge of the alleged facts in this incident.

6 31. Leona J. Ellis
7 Detective #298

8 Leona J. Ellis is an employee of the Tacoma Police
Department and has knowledge of the alleged facts in this
9 incident.

10 32. David P. Engstrom
Police Patrol Officer #348

11 David P. Engstrom is an employee of the Tacoma Police
12 Department and has knowledge of the alleged facts in this
incident.

13 33. William A. Foster
14 Detective #079

15 William A. Foster is an employee of the Tacoma Police
Department and has knowledge of the alleged facts in this
16 incident.

17 34. David A. Frost
Sergeant #080

18 David A. Frost is an employee of the Tacoma Police
19 Department and has knowledge of the alleged facts in this
incident.

20 35. Mark W. Fulghum
21 Police Patrol Officer #209

22 Mark W. Fulghum is an employee of the Tacoma Police
Department and has knowledge of the alleged facts in this
23 incident.

24 36. Daniell L. Griswold
Sergeant #495

25

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1 Daniell L. Griswold is an employee of the Tacoma Police
2 Department and has knowledge of the alleged facts in this
incident.

3 37. Peter M. Habib
4 Sergeant #026

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

7 38. Gayle M. Hall
8 Police Secretary #942

9 Gayle M. Hall is an employee of the Tacoma Police
10 Department and has knowledge of the alleged facts in this
incident.

11 39. Kenneth R. Hall
12 Police Patrol Officer #024

13 Kenneth R. Hall is an employee of the Tacoma Police
14 Department and has knowledge of the alleged facts in this
incident.

15 40. Tanya Hannon
16 Administrative Services Manager #971

17 Tanya Hannon is an employee of the Tacoma Police
18 Department and has knowledge of the alleged facts in this
incident.

19 41. Barton J. Hayes
20 Police Patrol Officer #438

21 Barton J. Hayes is an employee of the Tacoma Police
22 Department and has knowledge of the alleged facts in this
incident.

23 42. Mary K. Herrman
24 Police Patrol Officer #278

25 Mary K. Herrman is an employee of the Tacoma Police
Department and has knowledge of the alleged facts in this
incident.

43. Daryl C. Higgins
Detective #230

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1 Daryl C. Higgins is an employee of the Tacoma Police
2 Department and has knowledge of the alleged facts in this
incident.

3 44. Myla Hoffman-Hite
4 Former City of Tacoma EEO

5 Myla Hoffman-Hite is an employee of the Tacoma Police
6 Department and has knowledge of the alleged facts in this
incident.

7 45. Heath W. Holden
8 Police Patrol Officer #424

9 Heath W. Holden is an employee of the Tacoma Police
10 Department and has knowledge of the alleged facts in this
incident.

11 46. Corina E. Hopkins
12 Police Patrol Officer #499

13 Corina E. Hopkins is an employee of the Tacoma Police
14 Department and has knowledge of the alleged facts in this
incident.

15 47. Charles Howard
16 Lieutenant (retired)

17 Charles Howard is a former employee of the Tacoma Police
18 Department and has knowledge of the alleged facts in this
incident.

19 48. Darell Hughes
20 Lieutenant

21 Darell Hughes is an employee of the Tacoma Police
22 Department and has knowledge of the alleged facts in this
incident.

23 49. Steve Kirby
24 address to be provided

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

50. Manuela M. Loth
Police Patrol Officer #263

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(253) 472-6000

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

3 51. Gary H. Loyd
4 Police Patrol Officer #325

5 Gary H. Loyd is an employee of the Tacoma Police
6 Department and has knowledge of the alleged facts in this
incident.

7 52. Mark K. Mann
8 Sergeant #283

9 Mark K. Mann is an employee of the Tacoma Police
Department and has knowledge of the alleged facts in this
incident.

10 53. Barry N. McColeman
11 Detective #144

12 Barry N. McColeman is an employee of the Tacoma Police
Department and has knowledge of the alleged facts in this
incident.

13 54. Richard D. McCrea
14 Lieutenant #163

15 Richard D. McCrea is an employee of the Tacoma Police
16 Department and has knowledge of the alleged facts in this
incident.

17 55. Helen E. McKinney
18 Police Patrol Officer #150

19 Helen E. McKinney is an employee of the Tacoma Police
Department and has knowledge of the alleged facts in this
incident.

20 56. Charles E. Meinema
21 Captain #238

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

24 57. Joseph M. Mettler
25 Police Patrol Officer 113

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

3 58. Paul Mielbrecht
4 Captain

5 Paul Mielbrecht is an employee of the Tacoma Police
6 Department and has knowledge of the alleged facts in this
incident.

7 59. Gene E. Miller
8 Detective #329

9 Gene E. Miller is an employee of the Tacoma Police
10 Department and has knowledge of the alleged facts in this
incident.

11 60. Alan R. Morris
12 Police Patrol Officer #057

13 Alan R. Morris is an employee of the Tacoma Police
14 Department and has knowledge of the alleged facts in this
incident.

15 61. Paul L. Nielsen
16 Police Patrol Officer #276

17 Paul L. Nielsen is an employee of the Tacoma Police
18 Department and has knowledge of the alleged facts in this
incident.

19 62. David T. Olsen
20 Captain (Retired)

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

23 63. Philip F. Pavey
24 Detective #379

25 Philip F. Pavey is an employee of the Tacoma Police
Department and has knowledge of the alleged facts in this
incident.

64. Thomas C. Peltier
Lieutenant (Retired)

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1 Thomas C. Peltier is a former employee of the Tacoma
2 Police Department and has knowledge of the alleged facts in
this incident.

3 65. InCha Poindexter
4 Police Secretary #949

5 InCha Poindexter is an employee of the Tacoma Police
6 Department and has knowledge of the alleged facts in this
incident.

7 66. Martin L. Price
8 Police Patrol Officer #324

9 Martin L. Price is an employee of the Tacoma Police
Department and has knowledge of the alleged facts in this
incident.

10 67. Dennis W. Quillio
11 Police Patrol Specialist #394

12 Dennis W. Quillio is an employee of the Tacoma Police
13 Department and has knowledge of the alleged facts in this
incident.

14 68. Jennifer R. Quillio
15 Police Patrol Officer #107

16 Jennifer R. Quillio is an employee of the Tacoma Police
Department and has knowledge of the alleged facts in this
incident.

17 69. Charles N. Howard
18 Lieutenant (Retired) #359

19 Charles N. Howard is a former employee of the Tacoma
20 Police Department and has knowledge of the alleged facts in
this incident.

21 70. James R. Howatson
22 Lieutenant #336

23 James R. Howatson is an employee of the Tacoma Police
Department and has knowledge of the alleged facts in this
incident.

24 71. Darell S. Hughes
25 Lieutenant #259

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1 Darell S. Hughes is an employee of the Tacoma Police
2 Department and has knowledge of the alleged facts in this
incident.

3 72. Don L. Irvin
4 Sergeant #253

5 Don L. Irvin is an employee of the Tacoma Police
6 Department and has knowledge of the alleged facts in this
incident.

7 73. Paul A. Jagodinski
8 Police Patrol Officer #290

9 Paul A. Jagodinski is an employee of the Tacoma Police
10 Department and has knowledge of the alleged facts in this
incident.

11 74. Mark E. Jenkins
12 Sergeant #250

13 Mark E. Jenkins is an employee of the Tacoma Police
14 Department and has knowledge of the alleged facts in this
incident.

15 75. Colleen E. Johnson
16 Police Patrol Officer #432

17 Colleen E. Johnson is an employee of the Tacoma Police
18 Department and has knowledge of the alleged facts in this
incident.

19 76. Gary V. Johnson
20 Police Patrol Officer # 189

21 Gary V. Johnson is an employee of the Tacoma Police
22 Department and has knowledge of the alleged facts in this
incident.

23 77. Diana R. Judge
24 Police Patrol Officer #351

25 Diana R. Judge is an employee of the Tacoma Police
Department and has knowledge of the alleged facts in this
incident.

78. Shawn A. Kelstrup
Police Patrol Officer #459

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(253) 472-6000

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

3 79. Denise M. Kieffer
4 Sergeant #305

5 Denise M. Kieffer is an employee of the Tacoma Police
6 Department and has knowledge of the alleged facts in this
incident.

7 80. Dennis J. Kieffer
8 Sergeant #371

9 Dennis J. Kieffer is an employee of the Tacoma Police
10 Department and has knowledge of the alleged facts in this
incident.

11 81. Carol E. Krancich
12 Detective #479

13 Carol E. Krancich is an employee of the Tacoma Police
14 Department and has knowledge of the alleged facts in this
incident.

15 82. Patricia A. Larkin
16 Detective #244

17 Patricia A. Larkin is an employee of the Tacoma Police
18 Department and has knowledge of the alleged facts in this
incident.

19 83. Darell J. Larsen
20 Sergeant #052

21 Darell J. Larsen is an employee of the Tacoma Police
22 Department and has knowledge of the alleged facts in this
incident.

23 84. Roger L. Lawrence
24 Police Patrol Officer #306

25 Roger L. Lawrence is an employee of the Tacoma Police
Department and has knowledge of the alleged facts in this
incident.

85. Jewell E. Lerum
Sergeant #206

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1 Jewell E. Lerum is an employee of the Tacoma Police
2 Department and has knowledge of the alleged facts in this
incident.

3 86. Larry P. Lindberg
4 Detective #289

5 Larry P. Lindberg is an employee of the Tacoma Police
6 Department and has knowledge of the alleged facts in this
incident.

7 87. Gary G. Lock
8 Sergeant #366

9 Gary G. Lock is an employee of the Tacoma Police
10 Department and has knowledge of the alleged facts in this
incident.

11 88. Thomas Peltier
12 Lieutenant (Retired)

13 Thomas Peltier is a former employee of the Tacoma Police
14 Department and has knowledge of the alleged facts in this
incident.

15 89. Donald L. Ramsdell
16 Lieutenant #347

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

19 90. Ronald M. Rasmussen
20 Police Patrol Officer #146

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

23 91. Frank G. Richmond
24 Detective #328

25 Frank G. Richmond is an employee of the Tacoma Police
Department and has knowledge of the alleged facts in this
incident.

92. Barbara A. Salinas
Police Patrol Officer #321

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(253) 472-6000

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

3 93. Steven W. Shake
4 Detective #023

5 Steven W. Shake is an employee of the Tacoma Police
6 Department and has knowledge of the alleged facts in this
incident.

7 94. Robert Sheehan
8 Tacoma Police Union Local No. 6
901 South I St.
Tacoma, WA 98405

9 Robert Sheehan is Vice President of the Tacoma Police
10 Union Local No. 6.

11 95. James C. Smith
12 Sergeant #292

13 James C. Smith is an employee of the Tacoma Police
14 Department and has knowledge of the alleged facts in this
incident.

15 96. Thomas C. Strickland
16 Lieutenant #083

17 Thomas C. Strickland is an employee of the Tacoma Police
18 Department and has knowledge of the alleged facts in this
incident.

19 97. Michael M. Taylor
20 Sergeant #007

21 Michael M. Taylor is an employee of the Tacoma Police
22 Department and has knowledge of the alleged facts in this
incident.

23 98. Samuel M. Thrall
24 Sergeant #237

25 Samuel M. Thrall is an employee of the Tacoma Police
Department and has knowledge of the alleged facts in this
incident.

99. Erik W. Timothy
Police Patrol Officer #133

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1 Erik W. Timothy is an employee of the Tacoma Police
2 Department and has knowledge of the alleged facts in this
incident.

3 100. Sylvia C. Trent
4 Police Secretary #925

5 Sylvia C. Trent is an employee of the Tacoma Police
6 Department and has knowledge of the alleged facts in this
incident.

7 101. Richard A. Warner
8 Police Patrol Officer #239
9 Richard A. Warner is an employee of the Tacoma Police
10 Department and has knowledge of the alleged facts in this
incident.

11 102. Gary L. Wiegand
12 Lieutenant #207

13 Gary L. Wiegand is an employee of the Tacoma Police
14 Department and has knowledge of the alleged facts in this
incident.

15 103. James A. Young
16 Sergeant #361

17 James A. Young is an employee of the Tacoma Police
18 Department and has knowledge of the alleged facts in this
incident.

19 104. Sergeant Yuhasz

20 Sergeant Yuhasz is employed in Internal Affairs for the
21 Tacoma Police Department and has knowledge of the alleged facts
22 in this incident.

23 105. Rebecca A. Zeutschel
24 Detective #268

25 Rebecca A. Zeutschel is an employee of the Tacoma Police
Department and has knowledge of the alleged facts in this
incident.

106. D. P. Van Blaricom
839 91st Lane NE
Bellevue, WA 98004
425-453-0082

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5316 Orchard St. W.
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(253) 472-6000

1 Mr. Van Blaricom is a Police Practices expert. A copy of
2 his curriculum vitae is attached. He will testify as an expert
3 witness regarding his knowledge of Police Department procedures
4 regarding promotions, admonishments, retaliatory activity
5 towards union members, and other issues related to the
6 discriminatory treatment of plaintiff by the Tacoma Police
7 Department and its actors, agents and employees. Further, Mr.
8 Van Blaricom will testify to other department procedures
9 including, but not limited to, an opinion on the specific
10 treatment of plaintiff.

11 107. Philip G. Lindsay, M.D.
12 1101 Madison Street, Suite 1260
13 Seattle, WA 98104

14 Doctor Lindsay is a physician specializing in Internal
15 Medicine and Psychiatry. A copy of Doctor Lindsay's curriculum
16 vitae is attached. Doctor Lindsay has the education, experi-
17 ence and knowledge to testify regarding his evaluation and
18 treatment of Joseph Kirby as it relates to the events in this
19 incident.

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

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

109. Dr. Berryman Edwards
address to be provided

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

110. Jerome Rad, M.D.
Allenmore Medical Center
South 19th & Union, Ste A206
Tacoma, WA

Doctor Rad is a physician. He has the education,
training and experience to testify regarding his treatment of
Joseph Kirby and the effect the events of this incident have
had on his health.

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Tacoma, WA 98467-3633
(253) 472-6000

1 111. Gary L. Hendricksen, M.D.
 2 Allenmore Hospital
 3 1901 S. Union Ave.
 4 Tacoma, WA 98411

5 Doctor Hendricksen is a physician specializing in
 6 occupational medicine. He has the education, training and
 7 experience to testify regarding his findings as a result of his
 8 examination of Joseph Kirby for the City of Tacoma.

9 112. Zachary T. Kirby
 10 11808 Seminole Rd SW
 11 Lakewood, WA 98499

12 Zachary Kirby is the plaintiffs' son and will testify
 13 regarding his observations of the effects of the incident on
 14 his parents.

15 113. Lara N. Kirby
 16 11808 Seminole Road SW
 17 Lakewood, WA 98499

18 Lara Kirby is the plaintiffs' daughter. She will testify
 19 regarding her observations of the effects of the incident on
 20 her parents.

21 114. Jolin Lowry
 22 PO Box 112496
 23 Tacoma, WA 98411

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

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 2nd day of June 2000.

MESSINA BULZOMI

By  2736 For
 JOHN L. MESSINA 4440
 Attorneys for Plaintiffs

MESSINA • BULZOMI

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

D. P. VAN BLARICOM, INC.

MPA, FBI-NA, CHIEF OF POLICE (RET.)

POLICE PRACTICES EXPERT

835 - 91ST LANE N.E.

BELLEVUE, WASHINGTON 98004-4811

(425) 453-0082 FAX (425) 453-3263 E-Mail dvbinc@aol.com

SUMMARY OF QUALIFICATIONS:

- A. Retained as a police expert by both plaintiffs and defendants in over **850** lawsuits alleging police liability throughout the United States.
- B. Testified on numerous occasions in federal courts, state courts and arbitrations.
- C. Recognized as an expert on the issues of:
 1. **POLICE USE OF FORCE** (plaintiff's expert in the leading 9th Cir. case of Davis v. Mason County, WA 1991, a consultant to federal prosecution task force in United States v. Koon, et al. 1993 and a plaintiff's expert in Rodney King v. City of Los Angeles 1994, defendants' expert in 1st Cir. case of Roy v. City of Lewiston, ME 1994);
 2. **LESS-LETHAL ALTERNATIVES TO DEADLY FORCE IN BOTH EQUIPMENT AND TACTICS** (plaintiff's expert in the 9th Cir. case of Reed v. Hoy 1989 and ID S.Ct. case of Kessler v. Payette County and State of Idaho 1997);
 3. **POLICE K-9s AS USE OF FORCE** (quoted in Deadly Force: What We Know 1992);
 4. **CONTROL OF POLICE VEHICULAR PURSUIT and EMERGENCY DRIVING** (my policy was recommended by the Public Risk and Insurance Management Association of Washington, D.C. as being among the 4 best in the United States 1984, quoted by 2 CA Appellate Courts in Payne v. City of Perris 1993, Berman v. City of Daly City 1993, OR S.Ct. case of Lowrimore v. Marion County 1990 and MS S.Ct. case of Mosby v. Jeffries 1998);
 5. **POLICE ADMINISTRATION and POLICY**;
 6. **POLICE PRACTICES, PROCEDURES and STANDARDS of CARE** (plaintiff's expert in the 9th Cir. Case of Gulliford v. Pierce County);
 7. **SPECIAL DUTIES TO PROTECT and 911 RESPONSES** (plaintiffs' expert in WA S.Ct. cases of Bailey v. Town of Forks 1987 and Roy v. City of Everett 1992, AZ S.Ct. case Hutcherson v. City of Phoenix 1998, MT S.Ct. case of Nelson v. Driscoll 1999 and the leading 9th Cir. case of Wood v. Ostrander 1988);
 8. **DOMESTIC VIOLENCE** (quoted by the National Law Enforcement Policy Center in their model policy 1991);
 9. **CIVIL RIGHTS VIOLATIONS** (under 42 U.S.C. § 1983);

- H. Maintain an extensive and current library of standards, policies, procedures, references, depositions and information on other experts with subscription services to update professional and legal developments in my areas of expertise.

EDUCATION:

University of Washington - bachelor of arts degree with magna cum laude honors in 1973

Seattle University - master of public administration degree in 1976

University of Washington - certificate in forensics

Graduate of the FBI's National Academy and Law Enforcement Executive Development programs

Numerous and continuing professional training courses

TEACHING AND TRAINING EXPERIENCE:

Admitted as an adjunct faculty member at City University. Taught law enforcement courses at the Bellevue Police Academy, Washington Criminal Justice Education and Training Center, Bellevue Community College, Seattle University, Northwestern University's Traffic Institute and International City Management Association's Training Institute. Lectured on police-related issues before the University of Washington School of Law and Graduate School of Public Affairs, Simon Fraser University, American Civil Liberties Union, Washington State Bar, Seattle-King County Bar, Washington State Court Administrators, Washington Association of Legal Secretaries, American G. I. Forum, United States Justice Department Community Relations Service, National Institute of Law Enforcement and Criminal Justice, U. S. Attorney General's Task Force on Family Violence, Montana Department of Social and Rehabilitation Services, Washington Advisory Committee to the U.S. Commission on Civil Rights, American Society of Criminology, debated California Highway Patrol Commissioner on police pursuit before National Association of Police Planners and International Association of Police Planning and Research Officers in 1990, Labor Relations Information System, City of Bellevue's Management Certificate Training Program, lectured for Association of Trial Lawyers of America's Civil Rights Section and the National College of Advocacy on excessive force from the expert's perspective in 1994 and domestic violence litigation liability arising from failure of prevention and response in 1995, lectured on loss prevention civil liability to Nordstrom Washington/Alaska Region in 1997. Additionally, served on the Law Enforcement Education Advisory Committee to the Washington State Board for Community College Education in developing their statewide curriculum and also achieved the first college accreditation of a Basic Law Enforcement Academy in the State of Washington.

PUBLICATIONS:

"Recruitment and Retention of Minority Race Persons as Police Officers" in September 1976 issue of The Police Chief magazine, "An Overview of Police Service Today" in the April 18th and May 2nd, 1978 issues of Law Enforcement News, "Kids Meet Cops Through Basketball Trading Card Program" in the July 9th, 1979 issue of Law Enforcement News, "A Police Chief's View of Deadly Force" in the

National Institute of Law Enforcement & Criminal Justice January 1979 booklet on Police Use of Deadly Force, "Career Development: The Next Step to Police Professionalism" in the November 1979 issue of The Police Chief magazine, "Crime Prevention Cuts Insurance Cost" in the August 1980 issue of Center City Report, "A Sensible Alternative to Those High-Speed Chases" in the November 25, 1980 issue of The Seattle Times, "Chiefs Should Chase Sane Pursuit Driving Guidelines" in the December 22, 1980 issue of Law Enforcement News, "Commercial Crime Prevention Can Earn Discounts" in the February 1981 issue of the FBI Law Enforcement Bulletin, "Enforcing Malicious Harassment Laws" in the January 1983 edition of Washington Council on Crime and Delinquency News, "Reducing Crime, Traffic Accidents - Bellevue Shows It Can Be Done" in the May 10, 1983 issue of The Seattle Times and the June 27, 1983 issue of Law Enforcement News, "Carrying A Gun - It Depends On You" in the February 3, 1985 issue of the Journal-American, "When To Use Deadly Force" in the Winter 1985 issue of the Washington Law Enforcement Executive Journal, "Domestic Violence - A New Approach to an Old Problem" in the June 1985 issue of The Police Chief magazine, "In Pursuit Of The Pursuers - Police Pursuit Liability" in the 1987 issue of The Expert Witness Reporter, "It's Time for Police To Re-Examine Their Role In Society" in the October 1, 1989 issue of The Seattle Times, "Shaking The Pillars of Police Tradition" in the October 31, 1989 issue of Law Enforcement News, "Training-The First Hundred Years" in Law Enforcement In Washington State: The First Hundred Years 1889-1989, "K-9 Use of Force: A Biting Example of Questionable Policy" in the July/August 1992 issue of Law Enforcement News, "Police Pursuit: Uncontrolled Deadly Force" in the February 28, 1993 issue of Law Enforcement News, Bulletin Alert on a "Hair-raising Comb" in the June 1994 issue of the FBI Law Enforcement Bulletin, "Excessive Force - The Expert's Perspective" in the Association of Trial Lawyers of America July 1994 Annual Convention Reference Materials Volume I, "Domestic Violence Litigation: Liability Arising from Failure of Prevention and Response" in the Association of Trial Lawyers of America July 1995 Annual Convention Reference Materials Volume I, "Shades of Blue: What White Police Officers Can - and Must - Learn from Minority Officers" in the January/February 1996 of the Police Executive Research Forum's Subject to Debate, "Doing Something About Excessive Force" in the January 15, 1998 issue of Law Enforcement News, "The Consistent Law Enforcement Expert" in the November/December 1998 issue of The Forensic Examiner, "To Pursue or Not to Pursue: THAT is the Question" in the November 1998 issue of Police, "Handling the Mentally Ill" in the March 2000 issue of Police.

NATIONAL TELEVISION APPEARANCES:

NBC Nightly News special report on the dangers of police vehicular pursuit.

NBC Today Show:

1. Personal protection against criminal attack;
2. Misuse of pepper spray to punish.

NBC "You Be The Judge" on the dangers of police vehicular pursuit.

NATIONAL RADIO APPEARANCE:

NPR "Cops and the Mentally Ill".

QUOTED IN MAJOR NEWSPAPERS:

USA Today, Wall Street Journal, The New York Times, Los Angeles Times, San Francisco Examiner, The Seattle Times, The Oregonian, Toronto Sun.

PROFESSIONAL MEMBERSHIPS:

International Association of Chiefs of Police (Life Member), Police Executive Research Forum, Americans for Effective Law Enforcement, FBI National Academy Associates, Washington Association of Sheriffs & Police Chiefs (Life Member), Police Marksman Association, Law Enforcement Alliance of America, Police Writers Club, American College of Forensic Examiners Executive Advisory Board and Continuing Education Committee of the American Board of Law Enforcement Experts, American Society of Law Enforcement Trainers, International Police Association.

OTHER ACTIVITIES AND ASSOCIATIONS:

Present -

Washington State Retired Deputy Sheriffs/Police Officers Association, Retired Bellevue Police Officers Association, Pioneer Association.

Past -

Salvation Army's Metropolitan Seattle Advisory Board, Seattle University Alumni Association Board of Governors, Journal-American Board of Contributors, Historical Society of Seattle and King County Board of Trustees, Secretary of State's Advisory Group on Charitable Solicitations, King County Landmarks Commissioner, Bellevue Downtown Park Review Committee, Co-Chairman of Bellevue Chamber of Commerce Legislative Committee, Search and Screening Committee for Selection of Bellevue Community College President, Washington State Civil Air Patrol Citizens Advisory Council, Statewide City Employees Retirement System elected Trustee, City of Bellevue Disability Board, Municipal Employees Benefit Trust Retirement Committee, City of Bellevue Liaison to the Washington State Legislature, Bellevue Rotary Club, Aircraft Owners and Pilots Association as an FAA licensed commercial airplane and glider pilot with ratings for single engine land and sea, multi-engine land and instrument operations, elected Bellevue City Councilmember (did not run for re-election), Chairman of the Emerald City Flight Festival, Chairman of Wings Over Washington Centennial Celebration, Bellevue Repertory Theater Advisory Board, Woodland Park Zoo Bond Oversight Committee, United Olympic Life Insurance Company Board of Directors, Lakes Club

Board of Governors, Columbia Tower Club Founder Member, Wing Luke Asian Museum Advisory Board, National Defense Executive Reserve Emeritus, Vice President and Planning Committee Chairman of the Museum of Flight Board of Trustees Executive Committee, Bellevue Convention Center Authority Vice Chairman and Chairman of the Construction, Human Resources and Art Advisory Committees - Note: structure was selected as the "Best New Building" by the Puget Sound Business Journal, Eastside Journal Editorial Board, Advance Bellevue Advisory Board.

AWARDS:

USMC Expert Rifleman 1953-1956, FBI "Possible Club" 1970 (of the 19,130 police officers who attended the FBI National Academy during the 50 years from when it started to the year of my retirement in 1985, I was 1 of only 165/ .0086% who fired a perfect score on the PPC or TRC), Appreciation from the Drug Enforcement Administration 1977, Outstanding Community Service from Bellevue Jaycees 1979, Human Rights (Implementing Law and Order with Justice) from Baha'i Communities of Bellevue and Eastside 1980, Youth Service from the Chief Seattle Council of the Boy Scouts of America 1983, Program Innovation from the King County Domestic Violence Coalition 1983, Support and Service from Bellevue Cadet Squadron Auxiliary USAF 1984, Law Enforcement Appreciation from the Puget Sound Chapter of the American Society for Industrial Security (presented by the Governor of the State of Washington) 1984, Outstanding Volunteer Service from the Salvation Army 1984, Outstanding Service as a Public Official Citizenship Award from the Bellevue Kiwanis Club 1985, Appreciation from the United States Secret Service 1986, **Award for Public Service from The U.S. Department of Justice 1986**, Recognition for 30 Years of Public Service from the City of Bellevue 1986, Recognition and Commendation Resolution by the Municipality of Metropolitan Seattle 1988, Appreciation for Service from the Woodland Park Zoo Bond Oversight Committee 1990, Appreciation for Service from the King County Executive 1992, Appreciation for Personal Contribution to Developing Bellevue Convention Center from the City of Bellevue 1993, Outstanding Support of the Arts (jointly with wife) from the City of Bellevue Arts Commission 1993, ACFE Diplomate and Fellow: Board Certified Forensic Examiner 1995, Commendation for Outstanding Service from the City of Bellevue 1997.