

99-2-13911-4 3419921 DIS 04-28-03

HON. KAREN STROMBOM

CERTIFICATION

I hereby certify that on 7/2/01 I deposited in the mails of the United States of America and/or 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.

Vickie A. DeFrances
Messina Law Firm

FILED
IN COUNTY CLERK'S OFFICE
A.M. JUL 02 2001 P.M.
PIERCE COUNTY WASHINGTON
TED RUTTA 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,)

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.

6 JUL 03 2001

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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
incident.

7 11. Peter M. Habib
8 Sergeant #026

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

11 12. Steve Kirby
12 address to be provided

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

15 13. Charles E. Meinema
16 Captain #238

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

20 14. David T. Olsen
21 Captain (Retired)

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

24 15. Donald L. Ramsdell
25 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. Berryman 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.

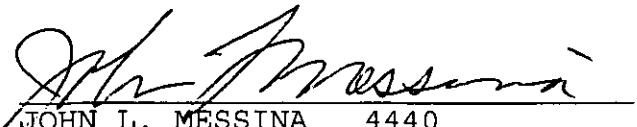
19 RESERVATION OF RIGHTS

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 2 day of July 2001.

MESSINA BULZOMI

By 
 JOHN L. MESSINA 4440
 Attorneys for Plaintiffs

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