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IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON
IN AND FOR THE COUNTY OF PIERCE

FILED
PIERCE COUNTY CLERK'S OFFICE
JUL 30 2001 P.M.
PIERCE COUNTY WASHINGTON
TED RUTT, COUNTY CLERK
DEPUTY

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

No. 99 2 13911 4

Plaintiffs,

DEFENDANTS' DISCLOSURE OF
PRIMARY WITNESSES

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.

Pursuant to PCLR 5, defendants hereby disclose the following fact and expert witnesses:

FACT WITNESSES

- 1. Ray Corpuz
Tacoma City Manager
747 Market Street
Tacoma, WA 98402

Ray Corpuz is a defendant in this cause of action.

DEFENDANTS' DISCLOSURE
OF PRIMARY WITNESSES - 1

ORIGINAL

Tacoma City Attorney
Civil Division
747 Market Street, Room 1120
Tacoma, Washington 98402-3767
(253) 591-5885/FAX 591-5755

2 JUL 31 2001

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2. Philip Arreola
2322 South Leyden
Denver, CO 80222

Philip Arreola is a defendant in this cause of action.

3. William Woodard.

William Woodard is a defendant in this cause of action.

4. Capt. Catherine Woodard.
Tacoma Police Department
930 Tacoma Avenue S.
Tacoma, WA 98402

Catherine Woodard is a defendant in this cause of action.

5. Assistant Chief Raymond Roberts.
Tacoma Police Department
930 Tacoma Avenue S.
Tacoma, WA 98402

Raymond Roberts is a defendant in this cause of action.

6. Assistant Chief David Brame
Tacoma Police Department
930 Tacoma Avenue S.
Tacoma, WA 98402

David Brame is a defendant in this cause of action.

7. Chief James Hairston
Tacoma Police Department
930 Tacoma Avenue S.
Tacoma, WA 98402

Chief Hairston is a defendant in this cause of action.

- 1 8. Captain Paul Mielbrecht
2 Tacoma Police Department

3 Captain Mielbrecht may testify concerning his interactions with
4 Joseph Kirby, in a supervisory capacity.

- 5 10. Deputy Chief Michael Darland
6 Tacoma Police Department

7 Deputy Chief Darland may testify concerning his interactions with
8 Joseph Kirby, in a supervisory capacity; and his participation in interviewing
9 applicants for the position of Captain.

- 10 11. Kenneth Monner
11 (Retired from Tacoma Police Department)
12 Address will be provided

13 Mr. Monner may testify concerning his knowledge of one or more
14 of the allegations contained in the plaintiffs' Second Amended Complaint.

- 15 12. Lt. Michael Miller
16 Tacoma Police Department

17 Lt. Miller may testify concerning his knowledge of one or more of
18 the allegations contained in the plaintiffs' Second Amended Complaint.

- 19 13. Sgt. Corey Darlington
20 Tacoma Police Department

21 Sgt. Darlington may testify concerning his knowledge of one or
22 more of the allegations contained in the plaintiffs' Second Amended Complaint.

- 1 14. Captain William Meeks
 Tacoma Police Department

2 Captain Meeks may testify concerning his interactions with
3 Joseph Kirby, in a supervisory capacity; as well as the hiring process for the
4 position of Captain.

- 5 15. Lt. Stanly Fisk
 Tacoma Police Department

6 Lt. Fisk may testify concerning his knowledge of one or more of
7 the allegations contained in the plaintiffs' Second Amended Complaint; and his
8 interactions with the plaintiff in the workplace.
9

- 10 16. Philip Gainey
 (Retired Tacoma Police Department)
 Address will be provided

11 Mr. Gainey may testify concerning his interactions with the plaintiff
12 in the workplace.
13

- 14 17. Lt. Richard D. McCrea
 Tacoma Police Department

15 Lt. McCrea may testify concerning his knowledge of one or more
16 of the allegations contained in the plaintiffs' Second Amended Complaint.
17

- 18 18. Sgt. Robert Sheehan
 Tacoma Police Department

19 St. Sheehan may testify concerning his knowledge of one or more
20 of the allegations contained in the plaintiffs' Second Amended Complaint.
21

1 19. Sgt. Robert Blystone
2 Tacoma Police Department

3 Sgt. Blystone may testify concerning his knowledge of one or
4 more of the allegations contained in the plaintiffs' Second Amended Complaint.

5 20. Tonya Harmon
6 Administrative Services Manager
7 Tacoma Police Department

8 Ms. Harmon may testify concerning her knowledge of one or more
9 of the allegations contained in the plaintiffs' Second Amended Complaint.

10 21. Sgt. Eugene Brame
11 Tacoma Police Department

12 Sgt. Brame may testify concerning his knowledge of one or more
13 of the allegations contained in the plaintiffs' Second Amended Complaint.

14 22. Beverly Palmer
15 Tacoma Police Department

16 Ms. Palmer may testify concerning her knowledge of one or more
17 of the allegations contained in the plaintiffs' Second Amended Complaint.

18 23. Alex McIntyre
19 (address will be provided)

20 Mr. McIntyre may testify regarding his former position with
21 Norman Roberts & Associates, and his participation in the screening and
22 interviewing of the applicants for the City of Tacoma Chief of Police..

23 24. Gary L. Henriksen, M.D.
24 1901 South Union Avenue
25 Tacoma, WA 98405

1 Dr. Henriksen may testify concerning his fitness-for-duty
2 examinations of Joseph Kirby on September 9, 1998 and February 21, 1999.

3 25. H. Berryman Edwards, M.D.
4 1811 ML King Jr Way
5 Tacoma, WA 98405

6 Dr. Edwards may testify concerning his independent medical
7 examinations of Joseph Kirby on April 30, 1999 and December 9, 1999.

8 **EXPERT WITNESSES**

9
10 1. Gerald M. Rosen, Ph.D.
11 Eastlake Center, Suite 205
12 2825 Eastlake Avenue East
13 Seattle, WA 98102

14 Dr. Rosen will testify concerning his record review and his
15 independent examination/evaluation of the plaintiff, Joseph Kirby.


16 **Reservation of Rights**

17 This defendant reserves the right to call at trial any and all lay witnesses
18 and expert witnesses disclosed or identified by any party to this action. This
19 defendant reserves the right to call at trial any and all other parties to this
20 action, whether or not disclosed or identified by any other party as a lay or
21 expert witness, including all witnesses discovered through on-going discovery
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procedures. This defendant reserves the right to elicit expert testimony from
any and all witnesses to the extent permitted by the applicable rules of
evidence.

DATED this 30th day of July, 2001.

ROBIN S. JENKINSON, City Attorney
ELIZABETH A. PAULI, Ch. Asst. City Atty.



SHELLEY M. KERSLAKE, WSB #21820
Assistant City Attorney

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