



99-2-13911-4 3606600 DIS 04-28-03

2 SEP 18 2001

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

DEFENDANTS' DISCLOSURE
OF REBUTTAL WITNESSES

FILED
IN COUNTY CLERK'S OFFICE
A.M. SEP 17 2001 P.M.
PIERCE COUNTY WASHINGTON
TED RUT COUNTY CLERK
BY _____ DEPUTY

Pursuant to PCLR 5, defendants hereby disclose the following potential
rebuttal witnesses:

1. Lt. James Walker
Tacoma Police Department

Lt. Walker may testify concerning his interactions with Joseph
Kirby and his knowledge of one or more of the allegations contained in the
plaintiffs' Second Amended Complaint.

DEFENDANTS' DISCLOSURE
OF REBUTTAL WITNESSES - 1

ORIGINAL

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

- 1 2. Michael Moorehead
2 (Retired from Tacoma Police Department)
3 Address will be provided

4 Mr. Moorehead may testify concerning his interactions with
5 Joseph Kirby and his knowledge of one or more of the allegations contained in
6 the plaintiffs' Second Amended Complaint.

- 7 3. Lt. Donald L. Ramsdell
8 Tacoma Police Department

9 Lt. Ramsdell may testify concerning his interactions with Joseph
10 Kirby in the workplace, and his knowledge of one or more of the allegations
11 contained in the plaintiffs' Second Amended Complaint.

- 12 4. Thomas Peltier
13 (Retired from Tacoma Police Department)
14 Address will be provided

15 Mr. Peltier may testify concerning his interactions with Joseph
16 Kirby in the workplace.

- 17 5. Russell Hauge
18 Kitsap County Prosecutor
19 Port Orchard, WA

20 Mr. Hauge may testify concerning his knowledge of the Safeco
21 insurance investigation.

- 22 6. Jay Hugh Ehly, M.D.
23 825 Commerce St. #300
24 Tacoma, WA 98402

25 Dr. Ehly may testify concerning his treatment of plaintiff Joseph
26 Kirby.

- 1 7. Jessy Ang, M.D.
 2 Objective Medical Assessment
 3 South 19th and Union
 4 Tacoma, WA 98405

5 Dr. Ang may testify concerning his findings following his
 6 examination of Joseph Kirby on October 3, 1986.

- 7 8. William Bowlby
 8 Pierce County Chaplaincy Association
 9 Tacoma, WA

10 Chaplain Bowlby may testify concerning his interactions with
 11 Joseph Kirby and his observations of Mr. Kirby's actions in the workplace.

- 12 9. Angela Pointdexter
 13 Secretary
 14 Tacoma Police Department

15 Ms. Pointdexter may testify concerning the interactions between
 16 plaintiff Joseph Kirby and the department staff.

- 17 10. Patti Pedersen
 18 Secretary
 19 Tacoma Police Department

20 Ms. Pedersen may testify concerning the interactions between
 21 plaintiff Joseph Kirby and the department staff.

- 22 11. Phil-Ja H. Blakey
 23 Industrial Insurance Claims Technician
 24 Workers Compensation Division
 25 City of Tacoma
 26 747 Market St.
 Tacoma, WA 98402

 Ms. Blakey may testify concerning her knowledge of plaintiff
 Joseph Kirby's workers compensation claim

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12. Andy Michaels
Risk Manager
City of Tacoma
747 Market St.
Tacoma, WA 98402

Mr. Michels may testify regarding the City's Workers
Compensation program.

13. All persons necessary to authenticate documents for the purpose
of use at trial.

Reservation of Rights

This defendant reserves the right to call at trial any and all lay witnesses
and expert witnesses disclosed or identified by any party to this action.

DATED this 17th day of September, 2001.

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



SHELLEY M. KERSLAKE, WSB #21820
Assistant City Attorney