

Honorable Ronald Castleberry
King County
No. 10-2-41119-4 SEA
Date Filed: April 29, 2011
CASE NUMBER: 10-2-41119-4 SEA
Time: 11:00 p.m.
Department 9

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SUPERIOR COURT OF WASHINGTON
FOR KING COUNTY

MARTIN RINGHOFER,)	No. 10-2-41119-4 SEA
)	
Petitioner and Plaintiff,)	
)	DECLARATION OF RICHARD M.
v.)	STEPHENS IN OPPOSITION TO
)	RESPONDENT'S MOTION FOR
LINDA K. RIDGE, in her official capacity as)	SUMMARY JUDGMENT
Deputy Chief Administrative Officer,)	DISMISSAL
)	
Respondent and Defendant.))	
)	
)	

I, Richard M. Stephens, declare as follows pursuant to GR 13 and RCW 9A.72.085:

1. I am an attorney employed by Groen Stephens & Klinge LLP, attorneys for Plaintiff in this matter. I am competent to be a witness in this matter and have personal knowledge of the facts stated herein.

2. On March 30, 2011, I served the Attorney General's office with a copy of the Petition for Writ of Mandate Complaint for Declaratory Relief and Petition Under GR 31 (Petition). Attached hereto as Exhibit 1 is a true and correct copy of a letter that accompanied the Petition.

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3. Attached hereto as Exhibit 2 is a true and correct copy of the response letter dated March 31, 2011 that I received from the Attorney General's office.

I declare under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct.

Executed this 18th day of April, 2011 at Bellevue, Washington.


Richard M. Stephens

EXHIBIT 1



GROEN
STEPHENS & KLINGE LLP
ATTORNEYS AT LAW

11100 N.E. 8TH STREET, SUITE 750
BELLEVUE, WASHINGTON 98004

JOHN M. GROEN
RICHARD M. STEPHENS
CHARLES A. KLINGE
SAMUEL A. RODABOUGH
BRIAN D. AMSBARY

TELEPHONE
(425) 453-6206
FACSIMILE
(425) 453-6224

March 30, 2011

Rob McKenna
Attorney General of Washington
PO Box 40100
Olympia, WA 98504-0100

**Re: Ringhofer v. Ridge
King County Superior Court Case No. 10-2-4119-4 SEA**

Dear Attorney General McKenna:

Pursuant to RCW 7.24.110, this is to notify that you that in the above-entitled case the issues include a claim for declaratory relief that RCW 2.36.072 and GR 18 of the Rules of Court are unconstitutional to the extent they prohibit the disclosure of information requested by my client. A copy of the original pleading is attached.

Sincerely,

GROEN STEPHENS & KLINGE LLP

Richard M. Stephens
stephens@GSKlegal.pro

RMS:lch
Enclosure

cc: Monique A. Miles

EXHIBIT 2



Rob McKenna

ATTORNEY GENERAL OF WASHINGTON

1125 Washington Street SE • PO Box 40100 • Olympia WA 98504-0100

March 31, 2011

Richard M. Stephens
Groen Stephens & Klinge LLP
11100 NE 8th Street, Suite 750
Seattle, WA 98004

Re: ***Ringhofer v. Ridge***
King County Sup. Ct. No. 10-2-4119-4 SEA

Dear Mr. Stephens:

Thank you for the copy of the Petition for Writ of Mandate Complaint for Declaratory Relief and Petition Under GR 31 in the above-captioned matter, which was mailed to this office pursuant to RCW 7.24.110.

The Attorney General's Office does not intend to participate in the superior court proceeding in this case and, therefore, you do not need to send our office any further pleadings. However, we do reserve the right to be heard in any appeal. Please serve the Attorney General with copies of any notice of appeal or notice of discretionary review in this matter.

Sincerely,

JEFFREY T. EVEN
Deputy Solicitor General
360-586-0728

JTE/rs