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BEFORE THE HEARING EXAMINER OF THE CITY OF MERCER ISLAND

In Re The Appeal of:

BARCELO HOMES, INC.,

Petitioner,

v.

CITY OF MERCER ISLAND,

Respondent.

No. APL21-003

(Ref. No. CE20-0058)

CITY OF MERCER ISLAND’S FILE
PRODUCED UNDER HEARING
EXAMINER RULE 224

The City of Mercer Island submits the following exhibits in the above-referenced matter, currently set for hearing on April 8, 2021:

Exhibit No.	Description	Date
1	Site Visit Photos Including Stop Work Order	10/12/2020
2	Complaint Regarding Continuing Work in Violation of Stop Work Order	1/8/2021
3	Site Visit Photos	1/12/2021
4	Site Visit Video	1/12/2021
5	Notice to N. Maksimchuk of Continuing Work in Violation of Stop Work Order	1/14/2021
6	Site Visit Photos	1/27/2021
7	Notice from D. Cole to Maksimchuks regarding continuing work in violation of stop work order	1/27/2021
8	Complaint	3/23/2021
9	Site Visit Photos	3/23/2021
10	Notice of Violation	2/11/2021

Exhibit No.	Description	Date
11	Notice of Appeal	2/25/2021
12	Aerial Photo	3/2020
13	Submitted Plans for Permits	
14	Comparison of Plan and Previous Site Footprint	
15	Tax Assessor Record	
16	Premium Homes Secretary of State Record	
17	Barcelo Secretary of State Record	
18	Barcelo 2020 Annual Report	
19	Barcelo Online Roster	
20	Reroofing Permit and Application	11/16/2021
21	Notice of Violation and Civil Penalties, CE19-0007, 9104 SE 50th Street	3/4/2019
22	Notice of Violation and Order to Correct, CE19-0023, 9104 SE 50th Street	4/2/2019
23	Notice of Violation of Stop Work Order, CE20-0017, 4719 90th Ave SE	4/16/2020
24	Agenda Code Compliance Discussion with Barcelo Homes	2/22/2019
25	Declaration of Public Notice	

The City reserves the right to seek admission of rebuttal exhibits after review of the Appellants' exhibits. The City further reserves the right to utilize documents identified by Appellants, and to rely on and elicit testimony concerning any provision of the Revised Code of Washington, Washington Administrative Code, or Mercer Island City Code.

DATED this 25th day of March, 2021.

MADRONA LAW GROUP, PLLC

By: /s/ Eileen M. Keiffer
Eileen M. Keiffer, WSBA No. 51598

Attorneys for the City of Mercer Island

1 **DECLARATION OF SERVICE**

2 I, Tori Harris, declare and state:

3 1. I am a citizen of the State of Washington, over the age of eighteen years, not a party
4 to this action, and competent to be a witness herein.

5 2. On the 25th day of March, 2021, I served a true copy of the foregoing City of
6 Mercer Island’s File Produced Under Hearing Examiner Rule 224 on the following counsel
7 of record using the method of service indicated below:

<p>8 Dianne K. Conway, WSBA No. 28542 9 Gordon Thomas Honeywell LLP 10 1201 Pacific Avenue, Suite 2100 11 Tacoma, WA 98402 12 Counsel for Petitioner</p>	<p><input type="checkbox"/> First Class, U.S. Mail, Postage Prepaid <input type="checkbox"/> Legal Messenger <input type="checkbox"/> Overnight Delivery <input type="checkbox"/> Facsimile <input checked="" type="checkbox"/> E-Mail: dconway@gth-law.com <input type="checkbox"/> EService pursuant to LGR</p>
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12 I declare under penalty of perjury under the laws of the State of Washington that the
13 foregoing is true and correct.

14 DATED this 25th day of March, 2021, at Seattle, Washington.

15 **MADRONA LAW GROUP, PLLC**

16 *Tori Harris*

17 _____
18 Tori Harris