

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26

BEFORE THE HEARING EXAMINER OF THE CITY OF MERCER ISLAND

In Re The Appeal of:

CAROL ANN COOK REVOCABLE  
LIVING TRUST,

Appellant,

v.

CITY OF MERCER ISLAND,

Respondent.

No. APL21-004

(Ref. No. CAO 20-004)

DECLARATION OF JEFF THOMAS IN  
SUPPORT OF CITY OF MERCER  
ISLAND’S MOTION TO EXCLUDE  
CERTAIN EXHIBITS

I, Jeff Thomas, declare and state:

1. I am over the age of eighteen year, not a party to this action, and competent to testify herein.

2. I am the Interim Community Planning & Development Director with the City of Mercer Island and have been employed there since September 2020.

3. I issued a letter declining the request for Code Interpretation made by Appellant’s attorney Kristen Reid on October 23, 2020. That letter is the same as the one that Appellant is attempting to offer as exhibit 1004.

4. There was no appeal to the City Hearing Examiner of the decision I made on October 23, 2020.

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


DECLARATION OF JEFF THOMAS IN SUPPORT OF  
CITY OF MERCER ISLAND’S MOTION TO EXCLUDE  
CERTAIN EXHIBITS - 1



14205 SE 36th Street  
Suite 100, PMB 440  
Bellevue, WA 98006  
Phone: 425-201-5111  
www.MadronaLaw.com

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26

DATED this 22<sup>ND</sup> day of April, 2021, at MERCER ISLAND, Washington.

By:  \_\_\_\_\_  
Jeff Thomas

DECLARATION OF JEFF THOMAS IN SUPPORT OF  
CITY OF MERCER ISLAND'S MOTION TO EXCLUDE  
CERTAIN EXHIBITS - 2



14205 SE 36th Street  
Suite 100, PMB 440  
Bellevue, WA 98006  
Phone: 425-201-5111  
[www.MadronaLaw.com](http://www.MadronaLaw.com)

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 22nd day of April, 2021, I served a true copy of the foregoing Declaration  
6 of Jeff Thomas in Support of City of Mercer Island’s Motion to Exclude Certain Exhibits on  
7 the following counsel of record using the method of service indicated below:

8 Kristen C. Reid, WSBA No. 38723 9 Belcher Swanson, PLLC 10 900 Dupont Street 11 Bellingham, WA 98225 Counsel for Petitioner	<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: kristen@belcherswanson.com <input type="checkbox"/> EService pursuant to LGR
---	--

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 22nd day of April, 2021, at Seattle, Washington.

15 **MADRONA LAW GROUP, PLLC**

16 *Tori Harris*

17 \_\_\_\_\_  
18 Tori Harris