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

CHRISTOPHER A. NIEDERMAN and  
NICOLE L. NIEDERMAN, husband and  
wife, and the marital community  
composed thereof,

Plaintiffs,

v.

STEVE YANG and SOPHY YANG,  
husband and wife, and the marital  
community composed thereof; UMPQUA  
BANK, a foreign bank corporation.

Defendants.

NO. 20-2-08679-7 SEA

DECLARATION OF SOPHY YANG  
IN SUPPORT OF MOTION FOR  
PARTIAL SUMMARY JUDGMENT  
DISMISSING ALL OF PLAINTIFFS'  
REMAINING CLAIMS

Sophy Yang states and declares as follows:

1. I am over 18 years of age, a citizen of Washington State and am  
competent to make this declaration based on my personal knowledge.

2. I live at 9668 SE 68<sup>th</sup> St, Mercer Island, WA, 98040 with my husband,  
Steve Yang.

3. Attached hereto as **Exhibit A** are text messages exchanged between  
Nicole Niederman and me on the dates indicated on the messages between 2015-2018.

DECLARATION OF SOPHY YANG IN  
SUPPORT OF MOTION FOR PARTIAL  
SUMMARY JUDGMENT DISMISSING ALL  
OF PLAINTIFFS' REMAINING CLAIMS – 1  
303999.1 | 102493.2



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

Dated this 1 day of Sept 2021 at Mercer Island, WA.

  
\_\_\_\_\_  
Sophy Yang

DECLARATION OF SOPHY YANG IN  
SUPPORT OF MOTION FOR PARTIAL  
SUMMARY JUDGMENT DISMISSING ALL  
OF PLAINTIFFS' REMAINING CLAIMS – 2  
303999.1 | 102493.2

  
1325 4TH AVE SUITE 1850 SEATTLE, WA 98101-2573

# EXHIBIT A



Nicole >

NOV 3, 2015, 8:29 PM

So cute!!!

Nov 25, 2015, 12:15 PM

Sophy,  
We are out of town. I put the garbage out Sunday before we left. If Ethan wants to put the cans back in their spot on our driveway (by the wave runner trailer next to our compost bin), I'll give him \$5. If not, we'll be back next Monday. Have a happy Thanksgiving!!  
Xoxo,  
Nicole & Family 🙄

Well do!! Don't worry about paying him ;)

Dec 17, 2015, 11:42 PM

It's welcome to the neighborhood gift- not Christmas 🙄

Thank you so much!!! Now We don't have to drink wine out of mason jars! 🙄 Merry Christmas!!!!

Dec 19, 2015, 10:58 PM

The kids wanted to stay and watch



iMessage





Nicole >

Art & Architect...

Nov 22, 2016, 1:07 PM

Sophy,  
Happy Thanksgiving!! We are out of town until Sunday. Apparently, a package was delivered to our house. Was wondering if the kids could snag it and keep it safe until the 28th?? Thanks in advance and sorry for any inconvenience! 🙄🙄  
-Nic

Ok

Thx!

Nov 22, 2016, 10:59 PM

Chloe pulled your garbage and recycle to dump

Thank you!!

Jan 12, 2017, 3:41 AM



iMessage





Nicole >

See you at 3pm. Text if you get back sooner. Happy New Year! Thank you for letting us borrow it.



Steve is home!

May 10, 2018, 11:48 AM

The movers are coming today to pack. Is it okay for me to park my car on the north side of the stone wall? 😊

Loading the truck tomorrow and moving out. So the truck will be here again. 😘

Sure

Thx!!

I am in and out a lot today. Two soccer tryouts..... errands in the morning and their other activities. Yikes!!

May 17, 2018, 10:23 PM

**Thank you!!!**  
We were actually at an open house



iMessage

