Hearing Examiner Galt

BEFORE THE HEARING EXAMINER OF THE CITY OF MERCER ISLAND

In Re The Appeal of:

JEFF GREENFIELD, as Owner of dog named Buster,

Petitioners,

v.

CITY OF MERCER ISLAND,

Respondent.

No. APL23-006

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 October 17, 2023:

Exhibit No.	Description	Date	Bates No.
1	Notice of Potentially Dangerous Dog	July 30, 2023	MI_0001 -
			MI_0002
2	Updated Violation	Undated	MI_0003 -
			MI_0010
3	Email Subject: Another	July 26, 2023	MI_0011 -
			MI_0012
4	Email Subject: Another mark	July 27, 2023	MI_0013 -
			MI_0018
5	Email Subject: Case #A23-004616	July 25, 2023	MI_0019 -
			MI_0032
6	Email Subject: Dog bite photos	July 25, 2023	MI_0033 -
			MI 0046

CITY OF MERCER ISLAND'S FILE PRODUCED UNDER HEARING EXAMINER RULE 224 - 1



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

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Exhibit No.	Description	Date	Bates No.
7	Email Subject: Dog bite	July 25, 2023	MI_0047 -
			MI_0060
8	Email Subject: Photo	July 26, 2023	MI_0061 -
	-	-	MI_0062
9	Email Subject: PP-38174: Maria	July 25, 2023	MI_0063 -
	Toro just completed Regional		MI_0065
	Animal Services of King County		
	(RASKC) Online Complaint Form		
10	Email Subject: RE: Dog bite photos	July 26, 2023	MI_0066 -
			MI_0078
11	Email Subject: Ring camera footage	July 26, 2023	MI_0079
	re:Buster Greenfield		
12	Email Subject: Stomach area	July 26, 2023	MI_0080 -
			MI_0081
13	Email Subject: Stomach bite	July 26, 2023	MI_0082 -
			MI_0083
14	Digital copy of packet for A23-	Various dates	MI_0084 -
	004616		MI_0165
15	Video 38b8afcf-65e9-4fde-8711-	July 22, 2023	MI_0166
	6054a5a91832		
16	Video 5d531303-5580-43e9-bf4e-	July 22, 2023	MI_0167
	3ed622f16877		
17	Video 726a7291-9050-49c8-aeeb-	July 22, 2023	MI_0168
	1e347cb30bb3		
18	Video a2c864cc-832e-47a2-a415-	July 22, 2023	MI_0169
	bb6ddeac1902		
19	Video ccee075b-fb61-4e93-96ec-	July 22, 2023	MI_0170
	b75322df7ba4		
20	Screen Recording 2023-07-25 at	July 22, 2023	MI_0171
	4.09.26 PM		
21	Appeal of Jeff Greenfield	Aug. 18, 2023	MI_0172 -
			MI_0175
22	City Staff Report	Oct. 6, 2023	MI_0176 -
			MI_0182
23	Declaration of Public Notice	Sept. 20, 2023	MI_0183 -
			MI_0185

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.

MADRONA

1	DATED this 10th day of October 2022	
2	DATED this 10th day of October, 2023.	
3	M	IADRONA LAW GROUP, PLLC
4	By	y: <u>/s/ Eileen M. Keiffer</u> ileen M. Keiffer, WSBA No. 51598
5	14	4205 SE 36 th Street
6		uite 100, PMB 440 ellevue, WA 98006
7	Te Er	elephone: (425) 201-5111 mail: <u>eileen@madronalaw.com</u>
8		
9		CITY OF MERCER ISLAND OFFICE OF THE CITY ATTORNEY
10		STREE OF THE CITT ATTORNET
11		By: /s/ Bio Park
12	9	Bio Park, WSBA No. 36994 9611 SE 36 th Street
13		Mercer Island, WA 98040 Γelephone: (206) 275-7652
14		Email: bio.park@mercerisland.gov
15	At	ttorneys for the City of Mercer Island
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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 10th day of October, 2023, 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			
8	of record using the method of service indicated below:		
9 10	Jeff Greenfield ☐ First Class, U.S. Mail, Postage Prepaid 8014 Avalon PL ☐ Legal Messenger Mercer Island, WA 98040 ☐ Overnight Delivery ☐ Facsimile		
11 12	Appellant		
13	I declare under penalty of perjury under the laws of the State of Washington that the		
14	foregoing is true and correct.		
15 16 17	DATED this 10th day of October, 2023, at Seattle, Washington.		
18	Tori Harris		
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