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SUPERIOR COURT OF WASHINGTON, COUNTY OF SAN JUAN

CLARE LINN WELKER and ABIGAIL
METZGER WELKER, Trustees of the Big
Sky Trust UDT 11-14-2002,
Plaintiffs,

v.

MOUNT DALLAS ASSOCIATION, a
Washington non-profit corporation; PETER
and KIMBERLY ALBERT; TIMOTHY
and SUSAN ALLEN; DAVID and
NANCY AUTH; ANITA BAILOR;
PATRICK and JOANN BALENGER;
MICAJAH BIENVENU and AMY
ANDERSON; CONSTANCE
BLACKMER; HENRY J. BORYS and
KESHA EWERS; JOHN and SHARON
BOYD; PATRICIA T. CASEY; KYLE
CHAPMAN and LADD JOHNSON;
WENDY CRAWFORD; PETER DAVIS
and SUSAN CRAMPTON DAVIS;
CYNTHIA and MARK DEARFIELD;
DAVID DUGGINGS and MEGAN
DETHIER; ROBERT T. EICHLER;
ROBERT J. ERSKINE, JR. and PEGGY
ERSKINE; JAMES L. and WENDY
FRANCIS; JAMES FRITZ; GREG and
JANE GERHARDSTEIN; GARY GERO;
JAMES GIMLETT and MAGGIE
GALLIVAN; CRAIG and JEAN
GRAHAM; JAMES and MARY GUARD;

NO. 15-2-05069-0

**DECLARATION OF
DEFENDANT L. CURTIS
WIDDOES, JR., IN RESPONSE
TO PLAINTIFFS' MOTION FOR
SUMMARY JUDGMENT**

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NASH R. GUBELMAN and LINDA
SOFTING-GUBELMAN; STERLING
TRUST COMPANY FBO; THOMAS and
COLLEEN HAVERMAN; RONALD and
ASHLEY HURST HENNEMAN;
HENNEMAN IRREVOCABLE TRUST;
LISA LYNN HILL; PAUL A. and
JENNIFERHOHENLOHE; GLENN and
DIANE KAUFMAN; FRED KEELER;
JANE B. KROESCHE; GORDON
LAGERQUIST; MAURICE and MOLLY
LIEBMAN; MADRONA RIDGE, LLC;
FLORENCE MCALARY; ROBERT and
SARA MCCLELLAN; J. ROYCE
MEYEROTT and LEE M. BRYAN;
JEROME S. and ANN MOSS; MOSS
TRUST; DIANNA PADILLA; MARK
PRZYBYLSKI and MAUREEN KAY
KOSHI; ROGER and JILL RATH;
PATRICIA ROBERTS; BENJAMIN
TROUTMAN and KARLA SABIN;
THOMAS SCHILLING; FLORENT
SCHOEBEL and JESSICA FARRER;
ERIK and ELAINE SCHUMY; WILLIAM
and LAURA SEVERSON; MARK
SHEPPARD; FRED and ELEANOR
SILVERSTEIN; SAN JUAN
PRESERVATION TRUST; DONALD E.
STRAUTON and MARIA SIKORSKI;
GREGORY A. and JANE SWANSON;
RIKKI SWIN; ROBERT TAUSCHER and
SANDRA HAWLEY; JOHN TAYLOR;
BRUCE D. TWOOMEY; CARTER and
JENNIFER WHALEN; L. CURTIS
WIDDOES; SILVERSTEIN-GERSTON
MOUNT DALLAS LLC; SP
INVESTMENTS II LLC;
Defendants.

1
2 I, L. Curtis Widdoes, Jr., declare under penalty of perjury under the laws of the State of
3 Washington as follows:

4 1. I am over the age of 18 and I am competent to be a witness in this lawsuit. I make
5 the following statements based upon my personal knowledge.
6

7 2. I am a Defendant named in this lawsuit.

8 3. I have joined in the Answer of the Mount Dallas Association ("the Association").

9 4. Since 2001, I have owned real property consisting of four tax parcels on Mount
10 Dallas Road, and I have resided there since 2006.

11 5. Since 2001, I have witnessed the way the Association has managed the roads at
12 issue.
13

14 6. I strongly approve of the way the Association has managed the roads. For
15 example, the Association successfully managed the initial paving of Mount Dallas Road in 2005
16 and successfully managed maintenance of the paved roadway for ten years following. Primarily
17 because of the efforts of the Association, the paved roadway now exists and is in good condition.
18

19 7. Having the Association continue to manage maintenance of the roads is in the
20 best interest of all the owners of properties served by the roads: Over the past 26 years, the
21 Association has accumulated substantial knowledge necessary to properly maintain the roads; the
22 Association is fair, frugal, responsible and effective in the way it maintains the roads; and the
23 Association minimizes costs by recruiting and utilizing a substantial amount of volunteer labor.
24


25 8. While this lawsuit is pending, I prefer that the Association perform all normal
26 maintenance of the roads as well as any other necessary maintenance of the roads.

27 9. At the conclusion of this lawsuit, I prefer that the Association be the entity to
28

1 manage future maintenance of the roads.

2
3 DATED THIS 14 day of OCTOBER, 2015.

4
5 L. Curtis Widdoes, Jr.

6 

7 signature