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COUNTY CLERKS OFFICE  
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DEC 29 2016  
JOAN P. WHITE  
SAN JUAN COUNTY, WASHINGTON

**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; et  
al.,

Defendants.

**NO. 15-2-05069-0**

**DECLARATION OF  
SANDRA J. HAWLEY**

I, Sandra J. Hawley declare as follows:

1. I am one of the defendants in the above-referenced matter and a member of the Mount Dallas Association (MDA). I have served on the Board of the MDA as Treasurer and/or Director every year since January 2012.
2. I have attached hereto as Exhibit "A", a true and correct copy of a list of signed and notarized Joinders in Road Maintenance Agreement ("Joiinders") for property owners whose properties benefit from easements along Mount Dallas Road. The MDA has now received signed Joinders for 54 (64%) of the 84 parcels owned by Mount Dallas property owners. I have personally verified that each and every Joinder on the list has been signed and notarized. Each Joinder references the

1 MDA's Road Maintenance Agreement recorded under AFN 2016-0302026. Each  
2 Joinder contains a provision that the agreement runs with the legally described  
3 property. Each Joinder on the list was delivered to the property owner(s) who  
4 signed the Joinder together with a true and correct copy of the Road  
5 Maintenance Agreement referenced by the Joinder.  
6

7 3. I have attached hereto as Exhibit "B", true and correct copies of seven lists of  
8 signed and notarized Joinders in Road Maintenance Agreement ("Jinders") for  
9 property owners who access their properties via the following seven side roads  
10 connecting to Mount Dallas Road: Lower No Name Road, Kiya Way, Tumac  
11 Road, Rascal Road, Stormridge Road, Rockledge Road and Skylark Lane. I  
12 have personally verified that each and every Joinder on the list has been signed  
13 and notarized. Each Joinder references the specific Side Road Maintenance  
14 Agreement which is attached to the new Declaration of Robert Tauscher. Each  
15 Joinder contains a provision that the agreement runs with the legally described  
16 property. Each Joinder on the list was delivered to the property owner(s) who  
17 signed the Joinder together with a true and correct copy of the Side Road  
18 Maintenance Agreement referenced by the Joinder.  
19  
20  
21

22 I declare under penalty of perjury under the laws of the state of  
23 Washington that the foregoing is true and correct and that this Declaration was  
24 executed at Friday Harbor, Washington on December 22, 2016  
25

26   
27 SANDRA J. HAWLEY  
28

# ROAD MAINTENANCE AGREEMENT JOINDERS FOR MOUNT DALLAS ROAD

<u>TPN</u>	<u>NAME</u>	<u>SIGNED</u>
451414002	Peter & Kimberly Albert	4-6-2016
452414001	James Timothy Allen & Susan D. Allen	3-2-2016
452411002	James Timothy Allen & Susan D. Allen	3-2-2016
451331002	David C. Auth	3-30-2016
452414002	Patrick James Ballenger, Trustee	3-9-2016
451322003	Micajah Ishmeal Bienvenu & Amy Christine Bienvenu	3-10-2016
451113005	Constance G. Blackmer	3-10-2016
451343006	Henry J. Borys & Keesha Ewers	11-11-2016
451113007	John W. Boyd and Sharon F. Boyd	3-8-2016
451144002	Peter A. Davis and Susan Crampton Davis	3-11-2016
451113001	Peter A. Davis and Susan Crampton Davis	3-11-2016
451114001	Peter A. Davis and Susan Crampton Davis	12-7-2016
451114004	Peter A. Davis and Susan Crampton Davis	12-7-2016
451332002	Mark G. Dearfield and Cynthia S. Dearfield	3-10-2016
451313001	David Duggins & Megan Dethier	3-10-2016
451343002	Robert J. Erskine, Jr. and Peggy R. Erskine	3-9-2016
451144001	James K. Fritz	3-18-2016
451324004	Craig E. Graham & Jean E. Graham	3-16-2016
451324003	Craig E. Graham & Jean E. Graham	12-13-2016
451332004	James Lawrence Gimlett	3-12-2016
452411001	James L. Guard & Mary B. Guard	3-2-2016
452442004	Nash Gubelman & Linda Softing Gubelman	3-29-2016
451414005	Thomas S. Haberman & Colleen M. Haberman, Trustees Of the Sterling Trust	3-10-2016
451343004	Paul Hohenloke & Jennifer Hohenlohe, Trustees of the Hohenloke Living Trust	3-14-2016

EXHIBIT     A

## ROAD MAINTENANCE AGREEMENT JOINDERS FOR MOUNT DALLAS ROAD

451343005	Paul Hohenloke & Jennifer Hohenlohe, Trustees of the Hohenloke Living Trust	3-14-2016
451323004	Glenn S. Kaufman & Diane L. Kaufman, Trustees	3-2-2016
451141003	Gordon F. Lagerquist	3-19-2016
451342003	Maurice Liebman & Molly Liebman	3-22-2016
451342004	Maurice Liebman & Molly Liebman	3-22-2016
451342001	Florence McAlary & Jean McFarland	3-15-2016
451342002	Florence McAlary & Jean McFarland	3-15-2016
451331003	J. Royce Meyerott & Lee M. Bryant	3-16-2016
452413002	J. Royce Meyerott & Lee M. Bryant	3-16-2016
451141002	Dianna K. Padilla	4-11-2016
451323002	Mark A. Przybylski & Maureen Kay Koski	3-11-2016
451334002	Roger & Jill Rath	3-29-2016
452421002	Roger & Jill Rath	3-29-2016
452421004	Roger & Jill Rath	3-29-2016
451322001	Patricia A. Roberts	3-29-2016
451322004	Patricia A. Roberts	3-29-2016
451113002	William A. Severson & Laura H. Severson	3-2-2016
451141001	Mark Sheppard	3-10-2016
451411001	Silverstein-Gerston Mt. Dallas LLC, Fred Silverstein	3-4-2016
451332001	SP Investments II, LLC, Timothy Overland, President	4-6-2016
451343003	Gregory A. Swanson & Jane Swanson	3-21-2016
452431002	John A. Taylor	3-10-2016
451144004	Robert C. Tauscher & Sandra J. Hawley	3-2-2016
451144003	Karla K. Sabin & Benjamin D. Troutman	3-8-2016

# ROAD MAINTENANCE AGREEMENT JOINDERS FOR MOUNT DALLAS ROAD

451322002	Bruce D. Twoomey	3-8-2016
452431004	L. Curtis Widdoes, Jr.	3-4-2016
452424001	L. Curtis Widdoes, Jr.	3-4-2016
452424002	L. Curtis Widdoes, Jr.	3-4-2016
452431003	L. Curtis Widdoes, Jr.	10-25-2016
452424004	L. Curtis Widdoes, Jr.	3-4-2016

**ROAD MAINTENANCE AGREEMENT JOINDERS FOR SIDE ROADS  
(With a Minimum 60% Consenting Property Owners)**

**LOWER NO NAME ROAD (2/3 or 66.7%)**

<u>TPN</u>	<u>NAME</u>	<u>SIGNED</u>
451332001	SP Investments II, LLC	4-6-2016
451332002	Mark G. & Cynthia S. Dearfield	3-10-2016

**KIYA WAY (14/16 or 87.5%)**

<u>TPN</u>	<u>NAME</u>	<u>SIGNED</u>
451144002	Peter A. Davis and Susan Crampton Davis	3-11-2016
451113001	Peter A. Davis and Susan Crampton Davis	3-11-2016
451114001	Peter A. Davis and Susan Crampton Davis	12-7-2016
451114004	Peter A. Davis and Susan Crampton Davis	12-7-2016
451113002	William A. & Laura H. Severson	3-2-2016
451113005	Constance G. Blackmer	3-10-2016
451113007	John W. & Sharon F. Boyd	3-24-2016
451141001	Mark Sheppard	3-10-2016
451141002	Dianna K. Padilla	4-11-2016
451141003	Gordon F. Lagerquist	3-23-2016
451144001	James K. Fritz	3-18-2016
451144003	Karla K. Sabin & Benjamin D. Troutman	3-8-2016
451144004	Robert C. Tauscher & Sandra J. Hawley	3-2-2016
451411001	Silverstein-Gerston Mount Dallas LLC	3-4-2016

**TUMAC ROAD (2/2 or 100%)**

<u>TPN</u>	<u>NAME</u>	<u>SIGNED</u>
451342001	Florence McAlary & Jean McFarland	3-15-2016
451342002	Florence McAlary & Jean McFarland	3-15-2016

EXHIBIT B  
1

**ROAD MAINTENANCE AGREEMENT JOINDERS FOR SIDE ROADS  
(With a Minimum 60% Consenting Property Owners)**

**RASCAL ROAD (2/2 or 100%)**

<u>TPN</u>	<u>NAME</u>	<u>SIGNED</u>
451343003	Gregory A. & Jane Swanson	3-21-2016
451343002	Robert J. & Peggy R. Erskine	3-9-2016

**STORMRIDGE ROAD (3/5 or 60%)**

<u>TPN</u>	<u>NAME</u>	<u>SIGNED</u>
452414001	James Timothy & Susan D. Allen	3-2-2016
452414002	Patrick James Ballenger, Trustee	3-9-2016
452413002	J. Royce Meyerott & Lee M. Bryan	3-16-2016

**ROCKLEDGE ROAD (6/10 or 60%)**

<u>TPN</u>	<u>NAME</u>	<u>SIGNED</u>
451343002	Robert J. Erskine, Jr. and Peggy R. Erskine	3-9-2016
452411001	James L. & Mary B. Guard	3-2-2016
451343003	Gregory A. & Jane Swanson	3-21-2016
451343004	Paul & Jennifer Hohenloe, Trustees	3-14-2016
451343005	Paul & Jennifer Hohenloe, Trustees	3-14-2016
451343006	Henry J. Borys & Keesha Ewers	11-11-2016

**SKYLARK LANE (3/4 or 75%)**

<u>TPN</u>	<u>NAME</u>	<u>SIGNED</u>
451343002	Robert J. Erskine & Peggy R. Erskine	3-9-2016
451343003	Gregory A. & Jane Swanson	3-21-2016
451343006	Henry J. Borys & Keesha Ewers	11-11-2016