

The Honorable Robert S. Lasnik

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UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

SUSAN SOTO PALMER, et al.,

Plaintiffs,

v.

STEVEN HOBBS, et al.,

Defendants.

And

JOSE TREVINO, ISMAEL CAMPOS, and
ALEX YBARRA,

Intervenor-Defendants

CASE NO. 3:22-cv-05035 RSL

DECLARATION OF JESSE L. TAYLOR
IN OPPOSITION TO PLAINTIFF’S
MOTION TO ENFORCE SUBPOENA
OF JIM TROYER OR
ALTERNATIVELY TO EXTEND
DISCOVERY DEADLINE FOR
COMPLIANCE AND PERMIT
DEPOSITION

Noted: January 27, 2023

I, Jesse L. Taylor, hereby declare as follows:

1. I am counsel for Chief of Staff James Troyer and the other non-party legislators and legislative staff who have been subject to subpoenas from Plaintiffs (the “Non-Parties”). I am over the age of 18 and am competent to testify as to the following based upon personal knowledge.

2. I supervised our law firm’s production of records from the Non-Parties in response to Plaintiffs’ subpoenas to our clients. I worked with each of the legislators who were the subjects of emailed subpoenas duces tecum from Plaintiffs’ counsel on April 5, 2022. Pursuant to my

1 direction, these legislators searched their personal records for, and produced, responsive records to
2 our law firm for Bates numbering and production. Our law firm produced to Plaintiffs all of those
3 records subject only to those that were withheld on the basis of privilege.

4 3. In addition, the Legislature and legislative staff voluntarily searched the legislative
5 systems for and produced records responsive to the April 5, 2022 emailed subpoenas excepting
6 those that were withheld on the basis of privilege.

7 I declare under penalty of perjury under all applicable law that, to the best of my
8 knowledge, information and belief, the foregoing is true and correct.

9 EXECUTED this 23rd day of January 2023, at Seattle, Washington.

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13 /s/ Jesse L. Taylor

Jesse L. Taylor