

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

COLIN MAYCOCK, et al.,

Plaintiff(s),

v.

CHRISTOPHER DUGOVICH, et al.,

Defendant(s).

Case No.: 2:19-cv-00562-TSZ

DECLARATION OF CHRIS DUGOVICH
IN RESPONSE TO DECLARATION OF
LOCAL 114

I, Chris Dugovich, declare and states as follows:

1. Jael Komac testified in a sworn declaration that her subsequent December 21, 2018 letter to Council 2 requested "identical and substantially similar information" as that requested by Colin Maycock's June 21, 2018 letter. *See* Dkt. 10 (Komac Decl.), at ¶ 1.5.

2. Council 2 subsequently offered to make the information requested by Mr. Maycock available, via the letter I sent on June 11, 2019. *See* Dkt. 15 (Dugovich Decl.), at ¶¶ 5-6 & Exhs. B-C. Ms. Komac was sent a copy of that June 11, 2019 letter, which made clear that "any member" may view the information at Council 2's offices. *See* Dkt. 15 (Dugovich Decl.), at ¶ 6 & Exh. C.

3. To the extent that Ms. Komac now contends that the information she requested in her December 21, 2018 letter was not "identical and substantially similar information" as that

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IN SUPPORT OF MOTION TO DISMISS - 1
CASE NO. 2:19-cv-00562-TSZ

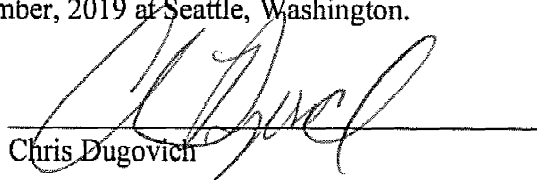
18 WEST MERCER ST., STE. 400 BARNARD
SEATTLE, WASHINGTON 98119 IGLITZIN &
TEL 800.338.4231 | FAX 206.378.4132 LAVITT LLP

1 requested by Mr. Maycock's June 21, 2018 letter, Dkt. 10 (Komac Decl.), at ¶ 1.5, neither she
2 nor Local 114 ever attempted to exhaust through the internal union appeals procedure the failure
3 to provide the information requested by Ms. Komac's December 21, 2018 letter that may have
4 been different from that requested in Mr. Maycock's June 21, 2018 letter. To date, Ms. Komac
5 has never filed a charge pursuant to Article X of AFSCME's constitution challenging the denial
6 of any requested information.

7
8 4. To date, neither Ms. Komac nor Mr. Maycock has responded to my June 11, 2019
9 letter or requested to make arrangements to view the information requested in Mr. Maycock's
10 June 21, 2018 letter.

11 I declare under penalty of perjury under the laws of the United State of America that the
12 foregoing statements are true and correct.

13 Signed this 4 day of September, 2019 at Seattle, Washington.

14
15 
Chris Dugovich

CERTIFICATE OF SERVICE

I hereby certify that on the date noted below, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to those attorneys of record registered on the CM/ECF system.

Attorney for Plaintiffs

Nicholas Power
The Law Office of Nicholas Power
540 Guard St., Suite 150
Friday Harbor, WA 98250
nickedpower@gmail.com

James P. Grifo
The Law office of James P. Grifo, LLC
164 Dougherty Ln
Friday Harbor, WA 98250
jpg@Grifolaw.com

Signed this 12th day of September, 2019



Esmeralda Valenzuela, Paralegal