

1 EXPEDITE
2 No hearing set
3 Hearing is set
4 Date: December 6, 2013
Time: 9:00 a.m.
Judge/Calendar: Hon. Erik Price

7 SUPERIOR COURT OF WASHINGTON FOR THURSTON COUNTY

8 JZK, INC., a Washington Corporation,
9 Plaintiff,
10 v.
11 THURSTON COUNTY, a municipal
12 corporation.
13 Defendant.

NO. 13-2-02177-1

DECLARATION OF JEFFREY GRANT
IN SUPPORT OF JZK, INC.'S MOTION
FOR SUMMARY JUDGMENT

14
15 Jeffrey Grant declares under penalty of perjury under the laws of the State of
16 Washington that the following is true.

17 1. I am an attorney with Skellenger Bender, PS, counsel of record for Plaintiff
18 JZK, Inc. in this action.

19 2. Attached to my Declaration and marked as Exhibit 2 is a one page document
20 containing two November 19, 2012 emails exchanged between Donald D. Krupp, Thurston
21 County Manager, and Tim Braniff, with the Thurston County Sheriff's Office. This
22 document was provided by Thurston County as part of its proposed Response to an August 5,
23 2013 Public Records Act Request.

24 Jeffrey Grant _____ s/ Jeffrey C. Grant

25 Date and Place of Execution November 8, 2013 at Seattle, WA

EXHIBIT

2

Fwd: Re: Health Concerns Letter you provided

From: Don Krupp
To: Commissioners and AssistantsDon SlomaDiana Yu
Date: 2012/11/19 13:43
Subject: Fwd: Re: Health Concerns Letter you provided

FYI - Regarding RSE

>>> Don Krupp 11/19/2012 13:41 >>>

Tim,

Thanks for looking in to this. I understand that Dr. Yu had advised Dr. Keay that she had forwarded the letter on to the Sheriff's Office, so it would probably be very appropriate to have someone from the Sheriff's Office call Dr. Keay to follow up.

Thanks,

Don

Donald D. Krupp
County Manager
360-786-5440
kruppd@co.thurston.wa.us

>>>Tim Braniff 11/19/2012 12:56 >>>

Don,

We reviewed the letter you provided addressed to Dr. Yu from Dr. Keay, and there is no current investigation pending on the individual mentioned, and without first-hand knowledge, we cannot continue our investigation.

I am asking since the letter was not addressed to our office, would you like us to call Dr. Keay to follow-up on the information he provided in the letter?

Tim