

Andrea H. McNeely
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Via Facsimile 360-458-4220 &
ABC Legal Messenger Service

January 8, 2014

Brian Keay, MD
313 Yelm Avenue West
Yelm, WA 98597

RE: JZK, Inc. v. Thurston County
Thurston County Cause No. 13-2-02177-1

Dear Dr. Keay:

This office, along with Skellenger Bender P.S., represents JZK, Inc. and JZ Knight in connection with a November 8, 2012, letter you wrote to Diana Yu, M.D., regarding your patient, Ms. Knight.

In your November 8 letter, you repeatedly make false statements and inflammatory and damaging accusations about Ms. Knight. You include unauthorized disclosures of your professional medical opinions regarding Ms. Knight's health, her mental condition and her physical condition, despite no recent examination by you. This is particularly troubling because subsequent to writing the letter, you stated under oath that Ms. Knight was in fact your patient, you had no factual basis for your statements, and that you failed to investigate their accuracy in any way. Instead, your letter conflates hearsay and rumor coupled with your history as Ms. Knight's medical provider and based on this improperly discloses highly offensive and false health care information and medical opinions as to Ms. Knight's health and condition.

Your statements are particularly damaging disclosures because not only is the information false, you rely on your position in the community as a medical doctor in your letter and purport to be communicating with Dr. Yu as a medical colleague. Yet Dr. Yu has never treated Ms. Knight, and Ms. Knight did not authorize you to communicate with Dr. Yu or to disclose Ms. Knight's name or any health care information related to Ms. Knight.

Reply to:

Tacoma Office
1201 Pacific Ave., Suite 2100 (253) 620-6500
Tacoma, WA 98402 (253) 620-6565 (fax)

Seattle Office
600 University, Suite 2100 (206) 676-7500
Seattle, WA 98101 (206) 676-7575 (fax)

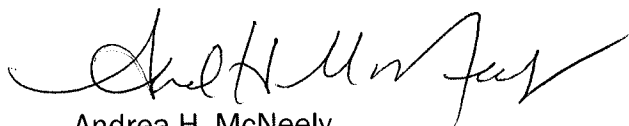
Gordon Thomas Honeywell^{LLP}
January 8, 2014
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Your letter is made all the more offensive because in stating your medical opinion with regard to Ms. Knight, you purport to rely on information given to you by other patients, yet you fail to disclose that at the time you wrote your letter, you were involved in an intimate relationship with one of those patients, Virginia Coverdale.

At the time you wrote the letter Ms. Coverdale was the defendant in a lawsuit based on her improper disclosure of RSE materials. Also at the time, Ms. Coverdale made public and unfounded accusations about RSE and Ms. Knight that parallel the accusations you made in your letter. You also failed to disclose in your letter that while you were involved in an intimate relationship with Ms. Coverdale she was working in your office and had access to the medical records of your other patients, including Ms. Knight.

Your actions are in violation of state and federal law. Please provide this office with certification or before, January 24, 2014, that you have destroyed all copies of the November 8, 2012, letter in your possession and have made a request to Dr. Yu and/or Thurston County for its return.

Sincerely,



Andrea H. McNeely

AHM:lh

cc: Mike Wright
Virginia Coverdale
Donald R. Peters