

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLORADO**

Civil Action No. 13-CV-01644-PAB-KMT

BRENDA WHITE,

Plaintiff,

vs.

WEIDNER PROPERTY MANAGEMENT,

Defendant.

DECLARATION OF KIL DAL KIM PURSUANT TO 28 U.S.C. § 1746

Pursuant to 28 U.S.C. § 1746, KIL DAL KIM, states upon personal knowledge as follows:

1. I have personal knowledge of the matters set forth in this Declaration.
2. I was hired by Defendant on April 28, 2014, as the Director of Information Technology. My first full day in the office was May 5, 2014.
3. I have over 15 years in IT systems engineering and management with expertise in IT systems administration, desktop support, data center operations, project and program management, and hosted applications support. Just prior to being hired by Weidner, I was employed by ADP. I managed a team of 24 associates that supported global hosting IT operations in five data centers and associate infrastructure for 88 global offices comprised of 10,000 associates. Prior to ADP, I was with the University of Washington College of Engineering. I managed all Staff, Faculty, and Student infrastructure from systems administration to desktop support.

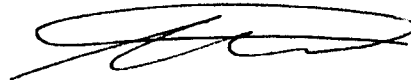
Kil Dal Kim
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4. On May 7, 2014, per the instruction of Shelby Felton, I conducted a search of the email boxes (inbox, sent items, deleted items) of Jack O'Connor, Jolene Stallman, Robert Carr, Rebecca Conover, and "Cherry Creek Director" for all emails from 2008 through 2013 with the search terms "Brenda," and "Brenda White" including all attachments. All emails for Defendant reside on a server in Kirkland, Washington. This is the server I searched. I sent the resulting emails to Shelby Felton according to the mailbox they were found in. The search produced approximately 2356 email strings.

5. I sent a folder of emails for Mr. O'Connor, Mr. Carr, Ms. Stallman, Ms. Conover, and "Cherry Creek Director." Additionally, because the search term "Brenda" was used, the search result included a number of employees named Brenda that were not Brenda White. For example, there were 1671 emails involving an employee named Brenda Huffty. These emails were sent to Ms. Felton in a folder titled "Brenda Huffty."

6. On May 9, 2014, per instruction from Shelby Felton, I conducted a remote search of the hard-drives of the individual computers of Jack O'Connor, Jolene Stallman, Robert Carr, and the property where Plaintiff worked. I did not locate any emails regarding "Brenda," or "Brenda White," on those individual computers.

I declare on this 30th day of May, 2014, under penalty of perjury that the statements contained herein are true and correct.



Kil Dal Kim