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The Honorable Ricardo S. Martinez

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

KENNETH FLEMING, JOHN DOE, R.K., and
T.D.,

Plaintiffs,

v.

THE CORPORATION OF THE PRESIDENT
OF THE CHURCH OF JESUS CHRIST OF
LATTER-DAY SAINTS, a Utah corporation
sole, a/d/a "MORMON CHURCH"; LDS
SOCIAL SERVICES a/d/a LDS, a Utah
corporation,

Defendants.

NO. 04-2338 RSM

SECOND DECLARATION OF
CHARLES C. GORDON RE:
MOTION FOR LEAVE TO TAKE
DEPOSITIONS

Charles C. Gordon, being duly sworn on oath, deposes and says:

1. I am one of the lead counsel for the Defendants in this matter.
2. Plaintiff's counsel has scheduled four depositions for the next several weeks.

Attached as Exhibit 1 is a true and accurate copy of a Plaintiff's Notice of Deposition of
Frederick Wise, Ph.D., which sets the deposition for July 28, 2006.

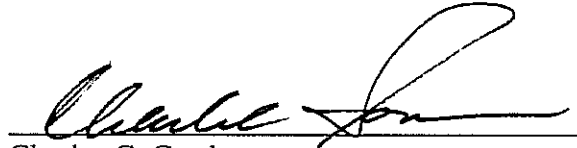
3. Attached as Exhibit 2 is a true and accurate copy of an email exchange I had with
a paralegal for Plaintiff's counsel confirming that they wish to take three depositions on August
8-10.

SECOND DECLARATION OF CHARLES C. GORDON RE:
MOTION FOR LEAVE TO TAKE DEPOSITIONS - 1
No. 04-2338 RSM

GORDON MURRAY TILDEN LLP
1001 Fourth Avenue, Suite 4000
Seattle, WA 98154
Phone (206) 467-6477
Fax (206) 467-6292

1 I declare under the laws of the State of Washington and of the United States that the
2
3 foregoing is true and correct.
4

5 DATED this 14th day of July, 2006.
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10 _____
11 Charles C. Gordon
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CERTIFICATE OF SERVICE


I hereby certify that on July 14, 2006, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following. The parties will additionally be served in the manner indicated.

Michael T. Pfau
Gordon, Thomas, Honeywell, Malanca,
Peterson & Daheim LLP
P.O. Box 1157
Tacoma, WA 98401-1157
Telephone: (206) 676-7500
Facsimile: (206) 676-7575
E-Mail: mpfau@gth-law.com

Timothy D. Kosnoff
Law Offices of Timothy D. Kosnoff, P.C.
600 University Street, Suite 2101
Seattle, WA 98101
Telephone: (206) 676-7610
Facsimile: (425) 837-9692
E-Mail: timkosnoff@comcast.net

Mail Hand Delivery
 Fax Federal Express

GORDON MURRAY TILDEN LLP

By 
Charles C. Gordon, WSBA No. 1773
Attorneys for Defendant The Corporation of the
President of the Church of Jesus Christ of
Latter-Day Saints
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Seattle, WA 98154-1007
Telephone: (206) 467-6477
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THE HONORABLE RICARDO MARTINEZ

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

KENNETH FLEMING, JOHN DOE, R.K.,
AND T.D.,

Plaintiffs,

v.

THE CORPORATION OF THE PRESIDENT
OF THE CHURCH OF JESUS CHRIST OF
LATTER-DAY SAINTS, a Utah corporation
sole, a/d/a "MORMON CHURCH"; LDS
SOCIAL SERVICES a/d/a LDA FAMILY
SERVICES, a Utah corporation,

Defendants.

NO. C04-2338 RSM

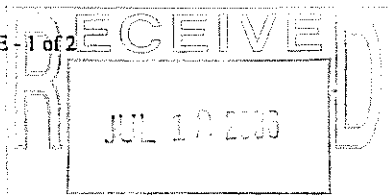
NOTICE OF DEPOSITION OF
FREDERICK WISE, Ph.D.

TO: FREDERICK WISE, Ph.D.

AND TO: Charles C. Gordon and Jeffrey I. Tilden, of Gordon Murray Tilden, Attorneys
for Defendants

The deposition upon oral examination of the following person will be taken on behalf
of Plaintiff RK before a court reporter and notary public at the date, time, and location listed
below:

DEP NOTICE OF FREDERICK WISE - 1 of 2
(C04-2338 RSM)
[166930 v03.doc]



LAW OFFICES
GORDON, THOMAS, HONEYWELL, MALANCA,
PETERSON & DAHEIM LLP
ONE UNION SQUARE
800 UNIVERSITY, SUITE 2100
SEATTLE, WASHINGTON 98101-4185
(206) 676-7500 - FACSIMILE (206) 676-7575

1
 2 WITNESS: Frederick Wise, Ph.D.
 3 DATE: Friday, July 28, 2006
 4 TIME: 11:00 a.m.
 5 LOCATION: Associates in Rehabilitation & Neuropsychology
 6 1600 East Jefferson, Suite 602,
 7 Seattle, WA 98122

8 This oral examination will be subject to continuance or adjournment from time to time
 9 or place to place until completed.

10 DATED this 11th day of July 2006.

11 GORDON, THOMAS, HONEYWELL, MALANCA,
 12 PETERSON & DAHEIM LLP

13 By Michelle Menely
 14 Michael T. Pfau, WSBA No. 24649
 15 Michelle A. Menely, WSBA No. 28353
 16 Attorneys for Plaintiffs

17 CERTIFICATE OF SERVICE

18 I, hereby certify that on July 11, 2006, I served the foregoing NOTICE OF
 19 DEPOSITION on defendant's attorneys of record by placing the foregoing in the daily
 outgoing ABC Legal Messenger box to be hand delivered to the following address:

20 Charles C. Gordon 21 Jeffrey I. Tilden GORDON MURRAY TILDEN LLP 1001 4 th Avenue, Suite 4000 22 Seattle, WA 98154	
---	--

23 Johnnie Dano
 24 Johnnie Dano, Paralegal
 25 Gordon, Thomas, Honeywell,
 Malanca, Peterson & Daheim, LLP

Chuck Gordon

From: Dano, Johnnie [jdano@gth-law.com]
Sent: Tuesday, July 11, 2006 4:42 PM
To: Chuck Gordon
Subject: RE: wise dep. ---July 28@ 11

Yes.

*Johnnie Dano, Paralegal
Gordon Thomas Honeywell
206/676-7512*

-----Original Message-----

From: Chuck Gordon [mailto:cgordon@gmtlaw.com]
Sent: Tuesday, July 11, 2006 4:42 PM
To: Dano, Johnnie
Subject: RE: wise dep. ---July 28@ 11

Will do. Are your depositions scheduled for Aug. 8-10 still on? Chuck

From: Dano, Johnnie [mailto:jdano@gth-law.com]
Sent: Tuesday, July 11, 2006 10:12 AM
To: Chuck Gordon
Subject: RE: wise dep. ---July 28@ 11

I'd say 4-5 hours. Please let me know his charge and if he requires a prepay. I will get the deposition notice out today and provide that the deposition take place at Dr. Wise's office at 11 AM on 7/28!

*Johnnie Dano, Paralegal
Gordon Thomas Honeywell
206/676-7512*

-----Original Message-----

From: Chuck Gordon [mailto:cgordon@gmtlaw.com]
Sent: Tuesday, July 11, 2006 10:07 AM
To: Johnnie 4Dano
Cc: Jeff Tilden
Subject: wise dep. ---July 28@ 11

Johannie, Dr. Wise's office called and requested how long the deposition will take. They apparently bill on reserved time. They would like the deposition to take place at his office, 1600 E. Jefferson, Suite 620 (Swedish/Providence). They have a room large enough for video. Do you want video?---and what is your estimated duration?

Exhibit 2 Page 6

7/11/2006

Charles C. Gordon
GORDON MURRAY TILDEN LLP
1001 4th Avenue, Suite 4000
Seattle, WA 98154

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Facsimile: (206) 467-6292
E-mail: cgordon@gmtlaw.com
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