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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

KENNETH FLEMING AND JOHN DOE,

Plaintiffs.

NO. CV4-2338-RSM

vs.

PLAINTIFFS' INITIAL DISCLOSURES
PURSUANT TO RULE 26(A)(1)

THE CORPORATION OF THE PRESIDENT
OF THE CHURCH OF JESUS CHRIST OF
LATTER-DAY SAINTS, a Utah Corporation
sole, a/k/a "MORMON CHURCH," LDS
SOCIAL SERVICES a/k/a LDS FAMILY
SERVICES, a Utah Corporation.

Defendants.

Plaintiffs Kenneth Fleming and John Doe provides these initial disclosures under Rule 26(a)(1) and in accordance with the Court's Order of December 14, 2004.

1. **Persons Likely to Have Discoverable Information**

See attached Exhibit A to Initial Disclosures.

2. **Documents**

The documents, data compilations and tangible things (collectively referred to as "documents") that are in the possession, custody or control of Plaintiffs and that Plaintiffs

PLAINTIFFS' INITIAL DISCLOSURES - 1 of 9
(C04-2338RSM)
[134417 v04]

LAW OFFICES
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1 may use to support their claims are described below by category and location of the available
2 documents and Plaintiffs reserve the right to disclose additional relevant documents as
3 discovery progresses.

- 4 A. Medical Records
- 5 B. Jack Onfrey, aka Jack Loholt, King County Suspect Information Report and
6 Bail Order, No. 90-1-01505-6
- 7 C. Jack Onofrey, aka Jack Loholt, King County Criminal Court File Documents,
8 90-1-01505-6.
- 9 D. Kenneth Fleming LDS Missionary Journals. Letters and Forms.
- 10 E. Renton and Kent State Directories 1969 through 1980.
- 11 F. Two Letters from Chief Seattle Council Boy Scouts of America to
12 Kenneth Fleming, date Oct. 7th and 27, 2003.

13
14 **3. Damages Claimed**

15 Plaintiffs have economic and non-economic damages, including pain and suffering,
16 emotional and psychological injuries, and possible past and future wage loss claims. General
17 damages are a matter for the unique province of the jury. Past and future wage loss will be
18 explained and supported by expert testimony.

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20 **4. Insurance Agreement**


21 None known at this time.

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Dated this 21 day of January, 2005.

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

By 

Michael T. Pfau, WSBA No. 24649
mpfau@gth-law.com
Attorneys for Plaintiffs

LAW OFFICE OF TIMOTHY D. KOSNOFF
Attorneys for Plaintiffs

By _____
Timothy D. Kosnoff, WSBA No. 16586

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CERTIFICATE OF SERVICE

I certify under penalty of perjury of the laws of the State of Washington that I am employed by Gordon, Thomas, Honeywell, Malanca, Peterson & Daheim and on this date I electronically filed the within Plaintiffs' Initial Disclosure Pursuant to Rule 26(A)(1) using the CM/ECF system which will send notification of such filing to the persons listed below. The persons listed below will also be delivered via legal messengers the document to which this Certificate of Service is attached to the attorneys of record as follows:

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Marcus B. Nash: mnash@staffordfrey.com, astone@staffordfrey.com

Dated and signed this 21st day January 2005
in Seattle, Washington.

Vicki D. Burrows
Vicki D. Burrows, for Gordon, Thomas,
Honeywell, Malanca, Peterson & Daheim

Exhibit A to Initial Disclosures

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PLAINTIFFS' INITIAL DISCLOSURES - 5 of 9
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PLAINTIFFS' INITIAL DISCLOSURES - 6 of 9
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