

The Honorable Marsha J. Pechman

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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

CITY OF SEATTLE, a first-class charter city,)
)
) Plaintiff,)
)
) v.)
)
) THE PROFESSIONAL BASKETBALL CLUB,)
) LLC, an Oklahoma limited liability company,)
)
) Defendant.)
)
)
)

No. C07-1620MJP
**DECLARATION OF PAUL R. TAYLOR
IN SUPPORT OF REPLY IN SUPPORT
OF MOTION TO EXCLUDE THE
TESTIMONY OF TIM CEIS**
**NOTE ON MOTION CALENDAR FOR
IMMEDIATE CONSIDERATION**

Paul R. Taylor declares as follows:

1. I am co-counsel for the defendant The Professional Basketball Club, LLC in this matter. The following is true and correct and based upon my own personal knowledge.
2. I deposed Tim Ceis. At no time either on the record or off the record did the City tell me that they were waiving any attorney-client privilege with regard to Mr. Ceis. Had they done so, I would have immediately served a request for production seeking documents that would otherwise have been covered by the attorney-client privilege.
3. I certify that the attached is a true and correct copy of a portion of the deposition of Tim Ceis.

1 I declare under penalty of perjury under the laws of the State of Washington that this
2 declaration is true and correct.

3 DATED in Seattle, Washington, this 25th day of June, 2008.

4
5 /s/ Paul R. Taylor

Paul R. Taylor, WSBA #14851

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CERTIFICATE OF SERVICE

I hereby certify that on the 25th day of June, 2008, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

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/s/ Paul R. Taylor

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