

The Honorable Marsha J. Pechman

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

<p>CITY OF SEATTLE, a first-class charter city,</p> <p style="text-align: right;">Plaintiff,</p> <p style="text-align: center;">v.</p> <p>THE PROFESSIONAL BASKETBALL CLUB, LLC, an Oklahoma limited liability company,</p> <p style="text-align: right;">Defendant.</p>	<p>)</p> <p>) No. C07-1620MJP</p> <p>)</p> <p>) DECLARATION OF STEVEN C. MINSON</p> <p>) IN SUPPORT OF REPLY REGARDING</p> <p>) MOTION TO (i) ELIMINATE</p> <p>) ATTORNEY'S EYES ONLY ("AEO")</p> <p>) DESIGNATIONS AND ELIMINATE</p> <p>) IMPROPER PRIVILEGE REDACTIONS;</p> <p>) (ii) SEAL DOCUMENTS PENDING</p> <p>) RULING ON AEO STATUS, AND (iii)</p> <p>) ELIMINATE TEN-DAY WAITING</p> <p>) PERIOD</p> <p>)</p> <p>) NOTE ON MOTION CALENDAR:</p> <p>) MAY 2, 2008</p> <p>)</p> <p>) [REDACTED VERSION]</p> <p>)</p>
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Steven C. Minson declares as follows:

I am one of the attorneys of record for defendant The Professional Basketball Club, LLC in this action. The following is true and correct and based upon my own personal knowledge:

1. Attached hereto as Exhibit 1 is a true and correct copy of an email dated March 30, 2008.
2. Attached hereto as Exhibit 2 are excerpts of the deposition of Matt Griffin, taken on April 29, 2008.

DECLARATION OF STEVEN C. MINSON IN SUPPORT OF
REPLY REGARDING MOTION TO (i) ELIMINATE
ATTORNEY'S EYES ONLY ("AEO") DESIGNATIONS, ET AL.
[REDACTED VERSION] (C07-1620MJP) - 1

BYRNES & KELLER LLP
38TH FLOOR
1000 SECOND AVENUE
SEATTLE, WASHINGTON 98104
(206) 622-2000

1 3. Exhibit 3 is a CD of video excerpts of the deposition of Matt Griffin, taken on
2 April 29, 2008, which will be hand delivered to both the Clerk of the Court and opposing counsel
3 under seal.

4 4. Attached hereto as Exhibit 4 is a true and correct copy of an email chain ending
5 December 19, 2007, an email chain dated January 29, 2008, and an email dated March 27, 2008.

6 5. Attached hereto as Exhibit 5 is a true and correct copy of a document dated
7 December 17, 2007.

8 6. Attached hereto as Exhibit 6 is a true and correct copy of an email chain ending
9 December 19, 2007.

10 7. Attached hereto as Exhibit 7 is a true and correct copy of an email dated
11 December 17, 2007, an email chain dated February 21, 2008, an email chain dated March 4,
12 2008, an email chain dated March 7, 2008, an email dated March 8, 2008, and an email dated
13 March 10, 2008.

14 8. Attached hereto as Exhibit 8 is a true and correct copy of an email dated
15 November 11, 2007.

16 9. Attached hereto as Exhibit 9 is a true and correct copy of an email dated
17 December 2, 2007.

18 10. Attached hereto as Exhibit 10 is a true and correct copy of an email dated
19 October 16, 2007.

20 11. Attached hereto as Exhibit 11 is a true and correct copy of an email dated
21 January 5, 2008.

22 12. Attached hereto as Exhibit 12 is a true and correct copy of an email chain dated
23 November 6, 2007, an email chain dated March 5, 2008, and an email chain dated April 11,
24 2008.

1 13. Attached hereto as Exhibit 13 is a true and correct copy of an email chain
2 beginning October 7, 2007, and ending October 16, 2007, an email dated November 2, 2007, an
3 email dated December 22, 2007, and an email dated January 7, 2008.

4 14. Attached hereto as Exhibit 14 is a true and correct copy of a document dated
5 December 27, 2007, an email dated February 16, 2008, and an email chain dated February 21,
6 2008.

7 15. Attached hereto as Exhibit 15 is a true and correct copy of a document dated
8 March 1, 2008.

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

11 DATED in Seattle, Washington, this 2nd day of May, 2008.

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14 /s/ Steven C. Minson
 Steven C. Minson, WSBA #30974

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CERTIFICATE OF SERVICE

I hereby certify that on the 2nd day of May, 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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EXHIBITS 1-15
FILED UNDER SEAL
PURSUANT TO
PROTECTIVE ORDER
DATED 3/13/08