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The Honorable James P. Donohue

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

KEVIN MCCLINTIC, on behalf of himself)
and all others similarly situated,)
)
Plaintiff,)
)
v.)
)
LITHIA MOTORS, INC.)
)
Defendant.)

No. 11-cv-00859JPD
**VERIFICATION OF STATE
COURT RECORDS**

I, ERIN M. WILSON, hereby declare:

1. I am one of the attorneys of record for Defendant Lithia Motors, Inc. in the above-referenced action. I am a citizen of the United States and am competent to make this declaration based upon my personal knowledge and to identify the exhibits attached hereto.

2. Pursuant to Local Rule W.D. Wash. 101(b), I verify the following documents are true and correct copies of all of the records that have been filed with the King County Superior Court under Cause No. 11-2-14632-4 SEA, *Kevin McClintic v. Lithia Motors, Inc.* as of today's date (*see* docket sheet attached as **Exhibit A**):

A. A true and correct copy of the Order Setting Civil Case Schedule, filed in King County Superior Court on April 21, 2011 (Superior Court docket no. 2), is attached hereto as **Exhibit B**;

VERIFICATION OF STATE COURT RECORDS - 1
No. 11-cv-00859

075801.0001/5084302.1

LANE POWELL PC
1420 FIFTH AVENUE, SUITE 4100
SEATTLE, WASHINGTON 98101-2338
206.223.7000 FAX: 206.223.7107

1 B. A true and correct copy of the Case Information Cover Sheet and Area
2 Designation, filed in King County Superior Court on April 21, 2011 (Superior Court docket
3 no. 3), is attached hereto as **Exhibit C**;

4 C. A true and correct copy of the Notice of Appearance of Lane Powell
5 PC, attorneys for Defendant Lithia Motors, Inc., filed in King County Superior Court on May
6 11, 2011 (Superior Court docket no. 5), is attached hereto as **Exhibit D**; and

7 D. A true and correct copy of the Notice to the Clerk re: Removal to
8 Federal Court (without attachments), filed in King County Superior Court on May 23, 2011
9 (Superior Court docket no. 6), is attached hereto as **Exhibit E**.

10 3. The following documents were attached to the Declaration of Erin M. Wilson
11 in Support of Removal, previously filed with this Court, and are not re-filed herein pursuant to
12 Local Rule W.D. Wash. 101(b):

13 A. Plaintiff's Complaint (Superior Court docket no. 1); and

14 B. Summons (Superior Court docket no. 4).

15 I declare under penalty of perjury of the laws of the United States and State of
16 Washington that the foregoing is true and correct.

17 EXECUTED at Seattle, Washington on this 31st day of May, 2011.

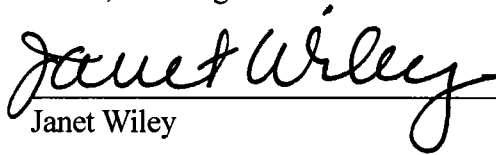
18
19 s/Erin M. Wilson
Erin M. Wilson

1 **CERTIFICATE OF SERVICE**

2 Pursuant to RCW 9.A.72.085, the undersigned certifies under penalty of perjury under
3 the laws of the State of Washington, that on the 31st day of May, 2011, the document attached
4 hereto was presented to the Clerk of the Court for filing and uploading to the CM/ECF
5 system. In accordance with their ECF registration agreement and the Court's rules, the Clerk
of the Court will send e-mail notification of such filing to all CM/ECF participants and any
non-CM/ECF participants will be served in accordance with the Federal Rules of Civil
Procedure.

6 Kim Williams
7 Rob Williamson
8 Williamson & Williams
9 17253 Agate Street NE
10 Bainbridge Island, WA 98110
11 E-Mail: roblin@williamslaw.com
12 E-Mail: kim@williamslaw.com

13 DATED this 31st day of May, 2011 at Seattle, Washington.

14 
15 _____
16 Janet Wiley

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VERIFICATION OF STATE COURT RECORDS - 3
No. 11-cv-00859

075801.0001/5084302.1

LANE POWELL PC
1420 FIFTH AVENUE, SUITE 4100
SEATTLE, WASHINGTON 98101-2338
206.223.7000 FAX: 206.223.7107

EXHIBIT A



Washington - King County Superior Court
11-2-14632-4

Information on King County Superior Court Case #: 11-2-14632-4
Search Title: 075801.000001: 11-2-14632-4 - WA Superior

Performed on: Tue May 31 2011 11:31:6 PST
Client/Matter Number (XXXXXX.XXXXXX): 075801.000001
Case #: 11-2-14632-4

Case Type: Civil

Summary Names Docket Attorneys Schedule Documents

SUMMARY Information

Title: MCCLINTIC VS LITHIA MOTORS INC
Judgment: NO
Filed: 04/21/2011
Cause of Action: TORT-OTHER
Resolution: UNCONTESTED RESOLUTION
Completion: UNCONTESTED COMPLETION
Case Status: 05 23 2011 - COMPLETED/RE-COMPLETED
Consolidated cases:
Note #1:
Note #2:
Off-line Date:

Records Located: Seattle
Judge Id: 46
Additional Info:

Resolution Date: 05 23 2011
Completion Date : 05 23 2011

Restore Date: N

NAMES Information

* - Total participants 6 . Click on the BAR number (or SCOMIS ID) for more detail.

Name: MCCLINTIC, KEVIN
Relation to Case: Plaintiff (PLA01)
Name: LITHIA MOTORS INC
Relation to Case: Defendant (DEF01)
Name: WILLIAMS, KATHRYN A
Relation to Case: Attorney for Plaintiff (ATP01)
Represented Parties: MCCLINTIC, KEVIN (PLA01)
Bar#: 9077 Washington State BAR Association number
Name: WILLIAMSON, ROBLIN JOHN
Relation to Case: Attorney for Plaintiff (ATP02)
Represented Parties: MCCLINTIC, KEVIN (PLA01)
Bar#: 11387 Washington State BAR Association number
Name: DEGGINGER, GRANT STEVEN
Relation to Case: Attorney for Defendant (ATD01)
Represented Parties: LITHIA MOTORS INC (DEF01)
Bar#: 15261 Washington State BAR Association number
Name: WILSON, ERIN M
Relation to Case: Attorney for Defendant (ATD02)
Represented Parties: LITHIA MOTORS INC (DEF01)
SCOMIS ID: 42454 Superior Court Management Information System ID

DOCKET Information

Item Number	Date	Court Code	Description/Name	Secondary Information
1	04 21 2011	CMP	COMPLAINT	
2	04 21 2011	*ORSCS	SET CASE SCHEDULE	10-08-2012ST

3	04 21 2011	JDG46 CICS LOCS	JUDGE SUZANNE M. BARNETT DEPT 46 CASE INFORMATION COVER SHEET ORIGINAL LOCATION - SEATTLE
4	04 21 2011	SM	SUMMONS
5	05 11 2011	NTAPR	NOTICE OF APPEARANCE /DEF
6	05 23 2011	NTFPR	NOTIC FILING PET REMOVE TO US DISTR

Schedule Information

Begin Date: Imposed	Event	Track: Due	DISP DISPOSED Completed
04/22/2011	AFFIDAVIT / CONFIRMATION OF SERVICE	05/19/2011	N/A
04/22/2011	DEADLINE TO FILE STMT ARBITRABILITY	09/29/2011	N/A
04/22/2011	CONFIRMATION OF JOINDER	09/29/2011	N/A
04/22/2011	DEADLINE TO TRANSFER CT PROCEEDINGS	10/13/2011	N/A
04/22/2011	STATUS CONFERENCE	10/13/2011	N/A
04/22/2011	DISCLOSURE POSS PRIMARY WITNESSES	05/07/2012	N/A
04/22/2011	JOINT STATUS REPORT		N/A
04/22/2011	DISCLOSURE POSS REBUTTAL WITNESSES	06/18/2012	N/A
04/22/2011	DEADLINE TO FILE JURY DEMAND	07/02/2012	N/A
04/22/2011	FINAL DATE TO CHANGE TRIAL	07/02/2012	N/A
04/22/2011	DISCOVERY CUTOFF	08/20/2012	N/A
04/22/2011	EXCHANGE WITNESS/EXHIBIT LISTS	09/17/2012	N/A
04/22/2011	DISPOSITIVE PRETRIAL MOTIONS	09/24/2012	N/A
04/22/2011	DEADLINE TO COMPLY WITH ADR		N/A
04/22/2011	JOINT STATEMENT OF EVIDENCE	10/01/2012	N/A
04/22/2011	SCHEDULED TRIAL DATE	10/08/2012	N/A
05/24/2011*	DISPOSED		

ATTORNEY Information

Name: Kathryn A Williams
187 Parfitt Way SW Ste 250
Bainbridge Island, WA 98110-2593

Relation:

Bar number: 9077

Phone: (206)780-4447

Last Reported:

Status: Active

Email: Kim@williamsllaw.com

Fax Number: (206)780-5557

Data source: Washington State BAR Association

Name: Roblin John Williamson
187 Parfitt Way SW Ste 250
Bainbridge Island, WA 98110-2593

Relation:

Bar number: 11387

Phone: (206)780-4447

Last Reported:

Status: Active

Email: roblin@williamsllaw.com

Fax Number: (206)780-5557

Data source: Washington State BAR Association

Name: Grant Steven Degginger
1420 5th Ave Ste 4100
Seattle, WA 98101-2338

Relation:

Bar number: 15261

Phone: (206)223-7000

Last Reported:

Status: Active

Email: deggingerg@lanepowell.com

Fax Number: (206)223-7107

Data source: Washington State BAR Association

Name: WILSON, ERIN M
1420 5TH AVE STE 4100

SEATTLE, WA 98101-2375

Relation:**SCOMIS ID:** 42454**Phone:** (206) 223-7432**Last Address Change:** 05/21/2010**Status:** Active**Data** Superior Court Management Information System**source:****DOCUMENTS Information**

Select	Doc	Date	Pages	Description
	1	04/21/2011	9	COMPLAINT
	2	04/21/2011	7	SET CASE SCHEDULE
	3	04/21/2011	1	CASE INFORMATION COVER SHEET
	4	04/21/2011	2	SUMMONS
	5	05/11/2011	2	NOTICE OF APPEARANCE /DEF
	6	05/23/2011	32	NOTIC FILING PET REMOVE TO US DISTR
Select All				

NOTE: "The Washington State Administrative Office of the Courts and the Washington State courts do not warrant that the information is accurate or correct and deny liability for any damages resulting from the release or use of the data. In order to assure or verify the accuracy of the information or data received, the customer should personally consult the "official" record reposing at the court of record.

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EXHIBIT B

FILED

11 APR 21 PM 12:23

KING COUNTY
SUPERIOR COURT CLERK
E-FILED
CASE NUMBER: 11-2-14632-4 SEA

IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON
IN AND FOR THE COUNTY OF KING

KEVIN MCCLINTIC

vs

LITHIA MOTORS, INC.

Plaintiff(s)

Defendant(s)

NO. 11-2-14632-4 SEA

Order Setting Civil Case Schedule (*ORSCS)

ASSIGNED JUDGE Barnett 46

FILE DATE: 04/21/2011

TRIAL DATE: 10/08/2012

A civil case has been filed in the King County Superior Court and will be managed by the Case Schedule on Page 3 as ordered by the King County Superior Court Presiding Judge.

I. NOTICES

NOTICE TO PLAINTIFF: The Plaintiff may serve a copy of this **Order Setting Case Schedule (Schedule)** on the Defendant(s) along with the **Summons and Complaint/Petition**. Otherwise, the Plaintiff shall serve the **Schedule** on the Defendant(s) within 10 days after the later of: (1) the filing of the **Summons and Complaint/Petition** or (2) service of the Defendant's first response to the **Complaint/Petition**, whether that response is a **Notice of Appearance**, a response, or a Civil Rule 12 (CR 12) motion. The **Schedule** may be served by regular mail, with proof of mailing to be filed promptly in the form required by Civil Rule 5 (CR 5).

"I understand that I am required to give a copy of these documents to all parties in this case."

_____|_____
Print Name Sign Name

I. NOTICES (continued)

NOTICE TO ALL PARTIES:

All attorneys and parties should make themselves familiar with the King County Local Rules [KCLR] -- especially those referred to in this *Schedule*. In order to comply with the *Schedule*, it will be necessary for attorneys and parties to pursue their cases vigorously from the day the case is filed. For example, discovery must be undertaken promptly in order to comply with the deadlines for joining additional parties, claims, and defenses, for disclosing possible witnesses [See KCLCR 26], and for meeting the discovery cutoff date [See KCLCR 37(g)].

CROSSCLAIMS, COUNTERCLAIMS AND THIRD PARTY COMPLAINTS:

A filing fee of \$230 must be paid when any answer that includes additional claims is filed in an existing case.

KCLCR 4.2(a)(2)

A Confirmation of Joinder, Claims and Defenses or a Statement of Arbitrability must be filed by the deadline in the schedule. The court will review the confirmation of joinder document to determine if a hearing is required. If a Show Cause order is issued, all parties cited in the order must appear before their Chief Civil Judge.

PENDING DUE DATES CANCELED BY FILING PAPERS THAT RESOLVE THE CASE:

When a final decree, judgment, or order of dismissal of all parties and claims is filed with the Superior Court Clerk's Office, and a courtesy copy delivered to the assigned judge, all pending due dates in this *Schedule* are automatically canceled, including the scheduled Trial Date. It is the responsibility of the parties to 1) file such dispositive documents within 45 days of the resolution of the case, and 2) strike any pending motions by notifying the bailiff to the assigned judge.

Parties may also authorize the Superior Court to strike all pending due dates and the Trial Date by filing a *Notice of Settlement* pursuant to KCLCR 41, and forwarding a courtesy copy to the assigned judge. If a final decree, judgment or order of dismissal of all parties and claims is not filed by 45 days after a *Notice of Settlement*, the case may be dismissed with notice.

If you miss your scheduled Trial Date, the Superior Court Clerk is authorized by KCLCR 41(b)(2)(A) to present an *Order of Dismissal*, without notice, for failure to appear at the scheduled Trial Date.

NOTICES OF APPEARANCE OR WITHDRAWAL AND ADDRESS CHANGES:

All parties to this action must keep the court informed of their addresses. When a Notice of Appearance/Withdrawal or Notice of Change of Address is filed with the Superior Court Clerk's Office, parties must provide the assigned judge with a courtesy copy.

ARBITRATION FILING AND TRIAL DE NOVO POST ARBITRATION FEE:

A Statement of Arbitrability must be filed by the deadline on the schedule if the case is subject to mandatory arbitration and service of the original complaint and all answers to claims, counterclaims and cross-claims have been filed. If mandatory arbitration is required after the deadline, parties must obtain an order from the assigned judge transferring the case to arbitration. Any party filing a Statement must pay a \$220 arbitration fee. If a party seeks a trial de novo when an arbitration award is appealed, a fee of \$250 and the request for trial de novo must be filed with the Clerk's Office Cashiers.

NOTICE OF NON-COMPLIANCE FEES:

All parties will be assessed a fee authorized by King County Code 4.71.050 whenever the Superior Court Clerk must send notice of non-compliance of schedule requirements and/or Local Civil Rule 41.

King County Local Rules are available for viewing at www.kingcounty.gov/courts/clerk.

II. CASE SCHEDULE

CASE EVENT	DEADLINE or EVENT DATE	Filing Needed
Case Filed and Schedule Issued.	Thu 04/21/2011	*
Last Day for Filing Statement of Arbitrability without a Showing of Good Cause for Late Filing [See KCLMAR 2.1(a) and Notices on Page 2]. \$220 arbitration fee must be paid	Thu 09/29/2011	*
DEADLINE to file Confirmation of Joinder if not subject to Arbitration. [See KCLCR 4.2(a) and Notices on Page 2].	Thu 09/29/2011	*
DEADLINE for Hearing Motions to Change Case Assignment Area. [See KCLCR 82(e)]	Thu 10/13/2011	
DEADLINE for Disclosure of Possible Primary Witnesses [See KCLCR 26(b)].	Mon 05/07/2012	
DEADLINE for Disclosure of Possible Additional Witnesses [See KCLCR 26(b)].	Mon 06/18/2012	
DEADLINE for Jury Demand [See KCLCR 38(b)(2)].	Mon 07/02/2012	*
DEADLINE for Setting Motion for a Change in Trial Date [See KCLCR 40(d)(2)].	Mon 07/02/2012	*
DEADLINE for Discovery Cutoff [See KCLCR 37(g)].	Mon 08/20/2012	
DEADLINE for Engaging in Alternative Dispute Resolution [See KCLCR 16(b)].	Mon 09/10/2012	
DEADLINE for Exchange Witness & Exhibit Lists & Documentary Exhibits [See KCLCR 4(j)].	Mon 09/17/2012	
DEADLINE to file Joint Confirmation of Trial Readiness [See KCLCR 16]	Mon 09/17/2012	*
DEADLINE for Hearing Dispositive Pretrial Motions [See KCLCR 56; CR 56].	Mon 09/24/2012	
Joint Statement of Evidence [See KCLCR (4)(k)].	Mon 10/01/2012	*
DEADLINE for filing Trial Briefs, Proposed Findings of Fact and Conclusions of Law and Jury Instructions (Do not file Proposed Findings of Fact and Conclusions of Law with the Clerk)	Mon 10/01/2012	*
Trial Date [See KCLCR 40].	Mon 10/08/2012	

III. ORDER

Pursuant to King County Local Civil Rule 4 [KCLCR 4], IT IS ORDERED that the parties shall comply with the schedule listed above. Penalties, including but not limited to sanctions set forth in Local Civil Rule 4(g) and Rule 37 of the Superior Court Civil Rules, may be imposed for non-compliance. It is FURTHER ORDERED that the party filing this action must serve this *Order Setting Civil Case Schedule* and attachment on all other parties.

DATED: 04/21/2011



PRESIDING JUDGE

IV. ORDER ON CIVIL PROCEEDINGS FOR ASSIGNMENT TO JUDGE

READ THIS ORDER BEFORE CONTACTING YOUR ASSIGNED JUDGE

This case is assigned to the Superior Court Judge whose name appears in the caption of this case schedule. The assigned Superior Court Judge will preside over and manage this case for all pretrial matters.

COMPLEX LITIGATION: If you anticipate an unusually complex or lengthy trial, please notify the assigned court as soon as possible.

APPLICABLE RULES: Except as specifically modified below, all the provisions of King County Local Civil Rules 4 through 26 shall apply to the processing of civil cases before Superior Court Judges. The local civil rules can be found at <http://www.kingcounty.gov/courts/superiorcourt/civil.aspx>.

CASE SCHEDULE AND REQUIREMENTS

Deadlines are set by the case schedule, issued pursuant to Local Civil Rule 4.

THE PARTIES ARE RESPONSIBLE FOR KNOWING AND COMPLYING WITH ALL DEADLINES IMPOSED BY THE COURT'S LOCAL CIVIL RULES.

A. Joint Confirmation regarding Trial Readiness Report:

No later than twenty one (21) days before the trial date, parties shall complete and file (with a copy to the assigned judge) a joint confirmation report setting forth whether a jury demand has been filed, the expected duration of the trial, whether a settlement conference has been held, and special problems and needs (e.g. interpreters, equipment, etc.).

The form is available at <http://www.kingcounty.gov/courts/superiorcourt.aspx>. If parties wish to request a CR 16 conference, they must contact the assigned court. Plaintiff's/petitioner's counsel is responsible for contacting the other parties regarding said report.

B. Settlement/Mediation/ADR

a. Forty five (45) days before the trial date, counsel for plaintiff/petitioner shall submit a written settlement demand. Ten (10) days after receiving plaintiff's/petitioner's written demand, counsel for defendant/respondent shall respond (with a counter offer, if appropriate).

b. Twenty eight (28) days before the trial date, a Settlement/Mediation/ADR conference shall have been held. **FAILURE TO COMPLY WITH THIS SETTLEMENT CONFERENCE REQUIREMENT MAY RESULT IN SANCTIONS.**

C. Trial: Trial is scheduled for 9:00 a.m. on the date on the case schedule or as soon thereafter as convened by the court. The Friday before trial, the parties should access the King County Superior Court website <http://www.kingcounty.gov/courts/superiorcourt.aspx> to confirm trial judge assignment. Information can also be obtained by calling (206) 205-5984.

MOTIONS PROCEDURES

A. Noting of Motions

Dispositive Motions: All summary judgment or other dispositive motions will be heard with oral argument before the assigned judge. The moving party must arrange with the hearing judge a date and time for the hearing, consistent with the court rules. Local Civil Rule 7 and Local Civil Rule 56 govern procedures for summary judgment or other motions that dispose of the case in whole or in part. The local civil rules can be found at <http://www.kingcounty.gov/courts/superiorcourt/civil.aspx>.

Nondispositive Motions: These motions, which include discovery motions, will be ruled on by the assigned judge without oral argument, unless otherwise ordered. All such motions must be noted for a date by which the ruling is requested; this date must likewise conform to the applicable notice requirements. Rather than noting a time of day, the Note for Motion should state "Without Oral Argument." Local Civil Rule 7 governs these motions, which include discovery motions. The local civil rules can be found at <http://www.kingcounty.gov/courts/superiorcourt/civil.aspx>.

Motions in Family Law Cases not Involving children: Discovery motions to compel, motions in limine, motions relating to trial dates and motions to vacate judgments/dismissals shall be brought before the assigned judge. All other motions should be noted and heard on the Family Law Motions calendar. Local Civil Rule 7 and King County Family Law Local Rules govern these procedures. The local rules can be found at <http://www.kingcounty.gov/courts/superiorcourt/civil.aspx>.

Emergency Motions: Under the court's local civil rules, emergency motions will be allowed only upon entry of an Order Shortening Time. However, emergency discovery disputes may be addressed by telephone call and without written motion, if the judge approves.

B. Original Documents/Working Copies/ Filing of Documents

All original documents must be filed with the Clerk's Office. Please see information on the Clerk's Office website at www.kingcounty.gov/courts/clerk regarding the new requirement outlined in LGR 30 that attorneys must e-file documents in King County Superior Court. The exceptions to the e-filing requirement are also available on the Clerk's Office website.

The working copies of all documents in support or opposition must be marked on the upper right corner of the first page with the date of consideration or hearing and the name of the assigned judge. The assigned judge's working copies must be delivered to his/her courtroom or the Judges' mailroom. Working copies of motions to be heard on the Family Law Motions Calendar should be filed with the Family Law Motions Coordinator. On June 1, 2009 you will be able to submit working copies through the Clerk's office E-Filing application at www.kingcounty.gov/courts/clerk.

Service of documents. E-filed documents may be electronically served on parties who opt in to E-Service within the E-Filing application. The filer must still serve any others who are entitled to service but who have not opted in. E-Service generates a record of service document that can be e-filed. Please see information on the Clerk's office website at www.kingcounty.gov/courts/clerk regarding E-Service.

Original Proposed Order: Each of the parties must include an original proposed order granting requested relief with the working copy materials submitted on any motion. Do not file the original of the proposed order with the Clerk of the Court. Should any party desire a copy of the order as signed and filed by the judge, a pre-addressed, stamped envelope shall accompany the proposed order.

Presentation of Orders: All orders, agreed or otherwise, must be presented to the assigned judge. If that judge is absent, contact the assigned court for further instructions. If another judge enters an order on the case, counsel is responsible for providing the assigned judge with a copy.

Proposed orders finalizing settlement and/or dismissal by agreement of all parties shall be presented to the assigned judge or in the Ex Parte Department. Formal proof in Family Law cases must be scheduled before the assigned judge by contacting the bailiff, or formal proof may be entered in the Ex Parte Department. If final order and/or formal proof are entered in the Ex Parte Department, counsel is responsible for providing the assigned judge with a copy.

C. Form

Memoranda/briefs for matters heard by the assigned judge may not exceed twenty four (24) pages for dispositive motions and twelve (12) pages for nondispositive motions, unless the assigned judge permits over-length memoranda/briefs in advance of filing. Over-length memoranda/briefs and motions supported by such memoranda/briefs may be stricken.

IT IS SO ORDERED. FAILURE TO COMPLY WITH THE PROVISIONS OF THIS ORDER MAY RESULT IN DISMISSAL OR OTHER SANCTIONS. PLAINTIFF/PEITITONER SHALL FORWARD A COPY OF THIS ORDER AS SOON AS PRACTICABLE TO ANY PARTY WHO HAS NOT RECEIVED THIS ORDER.



PRESIDING JUDGE

King County
Department of Judicial Administration
Superior Court Clerk's Office

IMPORTANT NOTICE
**KING COUNTY SUPERIOR COURT HEARING LOCATIONS
WILL CHANGE
IF THE MALENG REGIONAL JUSTICE CENTER IN KENT IS
CLOSED**

The Maleng Regional Justice Center (MRJC) in Kent lies within the former Green River floodplain and is at risk of flooding if the Green River overtops its levies in a major flood event. The MRJC facility will likely be evacuated and closed if an imminent flood is predicted and operations normally located there will be forced to relocate.

If it becomes necessary to close the MRJC facility and relocate the courtrooms, some scheduled court proceedings at the King County Courthouse in Seattle will also be affected, with a changed location.

PLEASE NOTE: If you have a court proceeding scheduled at either the King County Courthouse in Seattle or the Maleng Regional Justice Center in Kent, please call (206) 296-9300 x '0' to learn if there is a flood related change to the location of your court proceeding. Call within two days of your scheduled court date for the current information.

Current MRJC flood status and proceeding location information will also be posted online here:

King County Superior Court's website: <http://www.kingcounty.gov/courts/superiorcourt>

King County Clerk's Office website: <http://www.kingcounty.gov/courts/Clerk>

The Clerk's Office and Superior Court remain committed to providing good customer service throughout the flood watch season and, if necessary, during a MRJC facility closure period. We thank you for your patience during this time.

***Please include a copy of this notice when providing copies of court documents to other parties.**

EXHIBIT C

FILED

11 APR 21 PM 12:23

KING COUNTY
SUPERIOR COURT CLERK
E-FILED
CASE NUMBER: 11-2-14632-4 SEA

**SUPERIOR COURT OF WASHINGTON
COUNTY OF KING**

KEVIN MCCLINTIC

NO. 11-2-14632-4 SEA

VS

LITHIA MOTORS, INC.

CASE INFORMATION COVER SHEET
AND AREA DESIGNATION

CAUSE OF ACTION

(TTO) - TORT, NON-MOTOR VEHICLE

AREA DESIGNATION

SEATTLE - Defined as all King County north of Interstate 90 and including all of Interstate 90 right of way, all of the cities of Seattle, Mercer Island, Issaquah, and North Bend, and all of Vashon and Maury Islands.

EXHIBIT D

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SUPERIOR COURT OF WASHINGTON FOR KING COUNTY

KEVIN MCCLINTIC, on behalf of himself)
and all others similarly situated,)

Plaintiff,)

v.)

LITHIA MOTORS, INC.,)

Defendant.)

No. 11-2-14632-4SEA
NOTICE OF APPEARANCE

TO: Plaintiff and Rob Williamson and Kim Williams, Attorneys for Plaintiff
AND TO: CLERK OF THE COURT

PLEASE TAKE NOTICE that defendant Lithia Motors, Inc. hereby enters its appearance in the above-entitled action by the undersigned attorneys and Lane Powell PC, without waiving objections as to improper service or jurisdiction, and respectfully requests that all papers and pleadings in said cause, other than original process, be made upon the undersigned attorneys at their offices stated below.

DATED: May 11, 2011.

LANE POWELL PC

By s/Erin M. Wilson
Grant S. Degginger, WSBA No. 15261
Erin M. Wilson, WSBA No. 42454
Attorneys for Defendant Lithia Motors, Inc.

NOTICE OF APPEARANCE - 1

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CERTIFICATE OF SERVICE

I hereby certify that on May 11, 2011I caused to be served a copy of the foregoing
NOTICE OF APPEARANCE on the following person(s) in the manner indicated below at the
following address(es):

Rob Williamson
Kim Williams
Williamson & Williams
17253 Agate Street NE
Bainbridge Island, WA 98110
E-Mail: robw@williamslaw.com

- by CM/ECF
- by Electronic Mail
- by Facsimile Transmission
- by First Class Mail
- by Hand Delivery
- by Overnight Delivery

DATED this 11th day of May, 2011

s/Erin M Wilson
Erin M. Wilson

NOTICE OF APPEARANCE - 2

EXHIBIT E

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SUPERIOR COURT OF WASHINGTON FOR KING COUNTY

KEVIN MCCLINTIC, on behalf of himself)
and all others similarly situated,)

Plaintiff,)

v.)

LITHIA MOTORS, INC.)

Defendant.)

NO. 11-2-14632-4 SEA
**NOTICE TO SUPERIOR COURT
CLERK OF REMOVAL TO FEDERAL
COURT**

TO: Clerk of the Court
AND TO: Kevin McClintic, Plaintiff
AND TO: Kim Williams and Rob Williamson, his attorneys

NOTICE IS HEREBY GIVEN, pursuant to 28 U.S.C. § 1331, 1332, 1441 and 1446, that defendant Lithia Motors, Inc. filed a Notice of Removal, Declaration of Erin M. Wilson in Support of Removal, Declaration of Sheila Gill in Support of Removal, and Notice to Plaintiffs of Removal, copies of which are attached to this Notice, for removal of the above-entitled action to the United States District Court for the Western District of Washington at Seattle.

This removal terminates this Court's jurisdiction and all proceedings in this forum pursuant to 28 U.S.C. § 1331, 1332, 1441 and 1446.

NOTICE TO SUPERIOR COURT CLERK OF
REMOVAL TO FEDERAL COURT - 1

075801.0001/5073654.1

LANE POWELL PC
1420 FIFTH AVENUE, SUITE 4100
SEATTLE, WASHINGTON 98101-2338
206.223.7000 FAX: 206.223.7107

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DATED: May 23, 2011

LANE POWELL PC

By s/Erin M. Wilson
Grant S. Degginger, WSBA No. 15261
Erin M. Wilson, WSBA No. 42454
Attorneys for Defendant Lithia Motors, Inc.

NOTICE TO SUPERIOR COURT CLERK OF
REMOVAL TO FEDERAL COURT - 2

075801.0001/5073654.1

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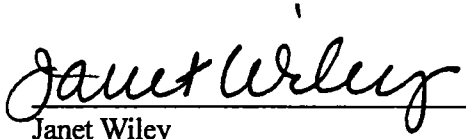
CERTIFICATE OF SERVICE

I hereby certify that on May 23, 2011, I caused to be served a copy of the foregoing document on the following person(s) in the manner indicated below at the following address(es):

Rob Williamson
Kim Williams
Williamson & Williams
17253 Agate Street NE
Bainbridge Island, WA 98110
E-Mail: roblin@williamslaw.com
E-Mail: kim@williamslaw.com

- by CM/ECF
- by Electronic Mail
- by Facsimile Transmission
- by First Class Mail
- by Hand Delivery
- by Overnight Delivery

DATED this 23rd day of May, 2011



Janet Wiley

NOTICE TO SUPERIOR COURT CLERK OF
REMOVAL TO FEDERAL COURT - 3

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