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2 THE HONORABLE RONALD B. LEIGHTON
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6
7 IN THE UNITED STATES DISTRICT COURT FOR THE
8 WESTERN DISTRICT OF WASHINGTON
9 AT TACOMA

10 CAROLYN ANDERSON,

11 Plaintiff,

12 v.

13 DOMINO'S PIZZA INC., DOMINO'S
14 PIZZA, LLC, FOUR OUR FAMILIES,
15 INC., and CALL-EM-ALL, INC.,

16 Defendants.

NO. C11-00902 RBL

**DECLARATION OF ROB
WILLIAMSON REGARDING
MISTAKE IN PLAINTIFF'S
OPPOSITION TO DEFENDANTS
DOMINO'S PIZZA, INC., AND
DOMINO'S PIZZA, LLC'S MOTION
FOR PROTECTIVE ORDER**

NOTED ON MOTION CALENDAR:
JANUARY 20, 2012

17 I, Rob Williamson, hereby declare as follows:

18 1. I am one of the attorneys for the Plaintiff in this matter.

19 2. In the Opposition filed in regard to Domino's Motion for Protective Order, I
20 stated that Domino's had not responded to any of the discovery at issue. In Reply, Domino's
21 observed this statement was false and pointed to 9 Requests for Production that had been
22 responded to. Upon reading this, I immediately contacted Domino's counsel to determine why I
23 had concluded we had not been served with any responses.

24 3. Domino's counsel advised me that the discovery had been sent by e-mail to me
25 and to my partner but that upon review of the e-mail in question, my e-mail address had been
26

DECLARATION OF ROB WILLIAMSON REGARDING MISTAKE IN
PLAINTIFF'S OPPOSITION TO DEFENDANTS DOMINO'S PIZZA,
INC., AND DOMINO'S PIZZA, LLC'S MOTION FOR PROTECTIVE
ORDER - 1
(Case No. C11-902-RBL)

**WILLIAMSON
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2 mistakenly entered so that I did not, in fact, receive the discovery. My partner did receive it but
3 assuming, as would be proper since I was the one working on these issue, I had also received the
4 e-mail; she did not forward hers to me. Apparently Domino's counsel has no mechanism that
5 alerts them to mis-sent emails.

6 4. Thus my statement in our Opposition that there were no responses to the
7 discovery was mistaken as to 9 of the Requests for Production. I have advised Domino's counsel
8 that I would file this Declaration to advise the Court of my error.
9

10 5. I also advised Domino's counsel that I would state to this Court that,
11 notwithstanding some of the Requests for Production were responded to, I did not believe the
12 responses were adequate and complete. Counsel agreed I could do so, without of course
13 conceding I am correct.

14 I declare under penalty of perjury of the laws of the State of Washington that the
15 foregoing statements are true and correct.
16

17 Dated: January 30, 2012 on Bainbridge Island, Washington

18 WILLIAMSON & WILLIAMS

19 s/RobWilliamson
20 Rob Williamson
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24 *Attorneys for Plaintiff and the Proposed Class*
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CERTIFICATE OF SERVICE

I hereby certify that on January 30, 2012, I electronically filed the DECLARATION OF ROB WILLIAMSON REGARDING MISTAKE IN PLAINTIFF'S OPPOSITION TO DEFENDANTS DOMINO'S PIZZA, INC., AND DOMINO'S PIZZA, LLC'S MOTION FOR PROTECTIVE ORDER with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all counsel of record who receive CM/ECF notification, and that the remaining parties shall be served in accordance with the Federal Rules of Civil Procedure.

Dated this 30th day of January, 2012

By /s/Rob Williamson
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