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Honorable Ronald B. Leighton

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON

CAROLYN ANDERSON,)
)
Plaintiff,)
)
vs.)
)
DOMINO'S PIZZA, INC., DOMINO'S)
PIZZA, LLC, FOUR OUR FAMILIES,)
INC., and CALL-EM-ALL, LLC,)
)
Defendants.)
)

CIVIL ACTION NO. C11-902-RBL
DECLARATION OF CHRIS ROESER
IN RESPONSE TO PLAINTIFF'S
MOTION TO COMPEL FRCP 30(B)(6)
WITNESSES

1. I, Chris Roeser am over 18 years of age and otherwise qualified to make the following declarations based on personal firsthand knowledge.
2. I am employed by Domino's Pizza, LLC as the Manager-Precision Marketing.

DECLARATION OF CHRIS ROESER - 1

LAW OFFICES
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SEATTLE, WA 98164
(206) 682-0902 (206) 682-1551

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3. I was the person at Domino's that was involved with the set up and implementation of the telephone "opt in" feature located on dominos.com.
4. Any correspondence regarding the "opt in" feature would likely have gone through me.
5. I am certain without reviewing all of my emails and files that I never corresponded with anyone about using the "opt in" feature in Washington State.
6. I have verified that the "opt in" feature was not used by any franchisee in Washington State.
7. The "opt in" feature was only active from mid August 2009 until September 2010.
8. I am also the person most knowledgeable regarding Domino's policies or positions on auto dial marketing.
9. I am familiar with the one document that Domino's generated to state its position on the subject; namely, Domino's does not encourage such marketing.

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

At Ann Arbor, Michigan this 29 day of March, 2012.


Chris Roeser

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CERTIFICATE OF SERVICE

The undersigned hereby certifies as follows:

I am employed at Dunlap & Soderland, PS, attorneys of record for Defendants Domino's Pizza, Inc. and Domino's Pizza, LLC.

On March 30, 2012, I caused a true and correct copy of the foregoing document to be delivered to the following via Legal Messenger and/or U.S. Mail.

Counsel for Plaintiff:

Rob Williamson
Kim Williams
Williamson & Williams
17253 Agate Street N.E.
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kim@williamslaw.com

Counsel for Four Our Families, Inc:

Nelson Fraley
Nicole Brown
Faubion, Reeder, Fraley & Cook, PS
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Counsel for Call-Em-All, LLC:

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CERTIFICATE OF SERVICE – 1

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2 Scott Shaffer
3 Olshan Grundman Frome Rosenzweig & Wolosky, LLP
4 Park Avenue Tower
5 65 East 55th Street
6 New York, NY 10022
7 ALustigman@olshanlaw.com
8 SShaffer@olshanlaw.com

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

11 DATED at Seattle, Washington this 30th day of March, 2012.

12 
13 _____
14 Gail M. Garner

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25 CERTIFICATE OF SERVICE – 2

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