

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26

David M. Soderland  
Brant A. Godwin  
Dunlap & Soderland, PS  
901 Fifth Avenue, #3003  
Seattle, WA 98164  
206-682-0902  
dsoderland@dunlapsoderland.com  
bgodwin@dunlapsoderland.com

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 NATALIE HAYDON  
IN RESPONSE TO PLAINTIFF'S  
MOTION TO COMPEL FRCP 30(B)(6)  
WITNESSES

1. I, Natalie Haydon 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 Area Leader-Field Marketing for the area covering Washington State.
3. I have held this position since August 2008.

DECLARATION OF NATALIE HAYDON - 1

LAW OFFICES  
DUNLAP & SODERLAND, P.S.  
901 FIFTH AVENUE, SUITE 3003  
SEATTLE, WA 98164  
(206) 682-0902 (206) 682-1551

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26

- 4. In my capacity as Area Leader - Field Marketing, I serve as the liaison between the Domino's Pizza LLC's marketing department and the franchisees in my territory. I am responsible for updating the franchisees on the national promotions, providing advice and guidance to individual franchisees and at DMA meetings and fielding general questions from franchisees regarding a wide range of issues.
- 5. I am the person at Domino's most likely have spoken with FOFI about marketing policies recommended by Domino's.
- 6. As contact person between Domino's and FOFI, any discussion of robo-calls would have gone through me.
- 7. In all probability I would have been copied on any email regarding robo-calling from a Washington franchisee.
- 8. Searching my computer is the simplest and best way to find potential emails regarding "calls" or "Brown" because I would have been aware of, copied on or participated in any such decision.
- 9. If they don't exist on my computer, it is unlikely they exist anywhere since I was the primary contact point between FOFI and Domino's related to marketing.
- 10. While I have had several conversations with Michael Brown of FOFI those conversations never included robo-call marketing. I was never instructed to tell any franchisee in the State of Washington that they needed to engage in robo-calling and

DECLARATION OF NATALIE HAYDON - 2

LAW OFFICES  
DUNLAP & SODERLAND, P.S.  
901 FIFTH AVENUE, SUITE 3003  
SEATTLE, WA 98164  
(206) 682-0902 (206) 682-1551

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26

never discussed robo-calling with any franchisee in the State of Washington. I was never informed by Michael Brown or any other employee of FOFI, or by anyone else for that matter, that FOFI utilized robo-calls in their local marketing efforts.

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

At Lakewood, Colorado this 30<sup>th</sup> day of March, 2012.

  
Natalie Haydon

1 **CERTIFICATE OF SERVICE**

2 The undersigned hereby certifies as follows:

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

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

7 **Counsel for Plaintiff:**

8 Rob Williamson  
9 Kim Williams  
10 Williamson & Williams  
11 17253 Agate Street N.E.  
12 Bainbridge Island, WA 98110  
[robin@williamslaw.com](mailto:robin@williamslaw.com)  
[kim@williamslaw.com](mailto:kim@williamslaw.com)

13 **Counsel for Four Our Families, Inc:**

14 Nelson Fraley  
15 Nicole Brown  
16 Faubion, Reeder, Fraley & Cook, PS  
17 5920 – 100<sup>th</sup> Street S.W., #25  
18 Lakewood, WA 98499  
[nfraley@fjr-law.com](mailto:nfraley@fjr-law.com)  
[nbrown@fjr-law.com](mailto:nbrown@fjr-law.com)

19 **Counsel for Call-Em-All, LLC:**

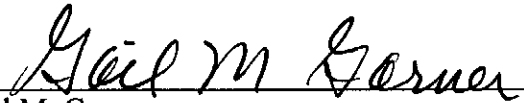
20 Kelly P. Corr  
21 Christina Dimock  
22 Anthjony Todaro  
23 Corr Cronin Michelson Baumgardner & Preece LLP  
24 1001 Fourth Avenue, #3900  
25 Seattle, WA 98154  
[kcorr@corrchronin.com](mailto:kcorr@corrchronin.com)  
[cdimock@corrchronin.com](mailto:cdimock@corrchronin.com)  
[atodaro@corrchronin.com](mailto:atodaro@corrchronin.com)

26 CERTIFICATE OF SERVICE – 1

1 Andrew Lustigman  
2 Scott Shaffer  
3 Olshan Grundman Frome Rosenzweig & Wolosky, LLP  
4 Park Avenue Tower  
5 65 East 55<sup>th</sup> 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 30<sup>th</sup> day of March, 2012.

12   
13 \_\_\_\_\_  
14 Gail M. Garner

15  
16  
17  
18  
19  
20  
21  
22  
23  
24 CERTIFICATE OF SERVICE – 2

25  
26  
LAW OFFICES  
DUNLAP & SODERLAND. P.S.  
901 FIFTH AVENUE, SUITE 3003  
SEATTLE, WA 98164  
(206) 682-0902 (206) 682-1551