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HONORABLE RICARDO MARTINEZ

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

CITY OF ISSAQUAH, a municipal corporation,

Plaintiff,

v.

ORA TALUS 90, LLC, a Delaware limited liability company; and RESMARK EQUITY PARTNERS, LLC, a Delaware limited liability company,

Defendants.

ORA TALUS 90, LLC, a Delaware limited liability company; and RESMARK EQUITY PARTNERS, LLC, a Delaware limited liability company,

Third-Party Plaintiffs,

v.

TERRA TALUS LLC, a Washington limited liability company; ELEMENT RESIDENTIAL INC., a Washington corporation; JOSHUA FREED, an individual; J.R. HAYES & SONS, INC., a Washington corporation; TERRA ASSOCIATES, INC., a Washington corporation; TALUS MANAGEMENT SERVICES LLC, a Washington limited liability company; and TALUS 7&8, LLC, a Washington limited liability company,

Third-Party Defendants.

NO. 18-CV-00910 RSM

STIPULATED MOTION AND ORDER TO CONTINUE TRIAL DATE AND RELATED DEADLINES

STIPULATED MOTION AND [PROPOSED] ORDER TO CONTINUE TRIAL DATE AND RELATED DEADLINES - 1

CAIRNCROSS & HEMPELMANN, P.S.
ATTORNEYS AT LAW
524 Second Avenue, Suite 500
Seattle, Washington 98104-2323
office 206 587 0700 fax 206 587 2308

1 TALUS 7&8 INVESTMENT, LLC, a
2 Washington limited liability company; J.R.
3 HAYES & SONS, INC., a Washington
4 corporation,

5 Fourth-Party Plaintiffs,

6 v.

7 KULCHIN FOUNDATION DRILLING
8 COMPANY, a Washington corporation, and
9 BIG MOUNTAIN ENTERPRISE LLC, a
10 Washington limited liability company,

11 Fourth-Party Defendants.

12 AND RELATED COUNTERCLAIMS AND
13 CROSSCLAIMS

14 I. RELIEF REQUESTED

15 Pursuant to LCR 16(b)(6), the Parties, by and through their respective counsel, jointly
16 move the Court to continue the trial date, presently set for February 22, 2021, by approximately
17 five months to July 2021, or as soon thereafter as the Court is available, and to issue a new case
18 schedule as outlined herein. In February of 2020, the Parties jointly requested, and the Court
19 granted, a four-month continuance of the trial date and related deadlines. Dkt. No. 97. This motion
20 represents the Parties' second request to continue the trial date and all related pretrial dates. Good
21 cause supports this request for a trial continuance.

22 II. BACKGROUND FACTS

23 The instant litigation arises out of a November 2015 landslide on a section of real property,
24 commonly referred to as Talus Parcel 9, located in Issaquah, Washington. The cause of the
25 landslide, as well as the nature and extent of the alleged resulting damage, is complicated and
26 disputed.

The City of Issaquah (the "City") initiated a lawsuit in June 2018 in King County Superior
Court against the owners of Talus Parcel 9 for damage to the City's infrastructure and water

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CAIRNCROSS & HEMPELMANN, P.S.
ATTORNEYS AT LAW
524 Second Avenue, Suite 500
Seattle, Washington 98104-2323
office 206 587 0700 fax 206 587 2308

1 facilities caused by the landslide. The property owner removed the action to federal court, asserted
2 counterclaims against the City, and impleaded other parties alleging they are at fault for the City's
3 damages, if any, as well as the property owner's damages. Two of these third-party defendants,
4 in turn, impleaded two subcontractors. The parties have collectively asserted at least 30 claims,
5 counterclaims, and crossclaims amongst one another. The case involves 10 parties, represented
6 by over 20 lawyers from 13 law firms.

7 Discovery in this action is ongoing and extensive. The Parties have produced over 15,000
8 documents, many of which consist of dense construction project files and complicated engineering
9 records. Some of the parties have not completed their document productions and continue to
10 produce their responsive documents on a rolling basis. Additionally, a number of parties' written
11 discovery and document productions were significantly delayed during the coronavirus pandemic
12 and current stay-at-home order in the State.

13 Deposition scheduling has also been stymied due to the COVID-19 pandemic and resulting
14 stay at home orders in Washington and around the country. In February, the Parties had
15 collaboratively worked together to schedule approximately two dozen depositions to occur in
16 March and April. However, the Parties were subsequently forced to cancel these depositions due
17 to the rise of the pandemic in Washington (and around the country) in late-February and March.
18 By collective agreement, the Parties have since put all depositions on hold for the time-being given
19 the pandemic and pending Stay-At-Home Order in Washington and California (where lead counsel
20 for ORA Talus 90 resides). The Parties have held monthly teleconferences to discuss the
21 possibility of resuming depositions taking into account first and foremost the personal health and
22 safety of the witnesses, the court reporters, and counsel. During the Parties' teleconference on
23 April 30, 2020, counsel agreed that, given the number of parties and separate law firms involved,
24 as well as the volume of documents anticipated to be used at each deposition, in-person depositions
25 are preferred over video-conference depositions. The Parties, therefore, stipulated to hold off
26 scheduling depositions for at least another four weeks as they monitor the public health situation.

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CAIRNCROSS & HEMPELMANN, P.S.
ATTORNEYS AT LAW
524 Second Avenue, Suite 500
Seattle, Washington 98104-2323
office 206 587 0700 fax 206 587 2308

1 Thus, despite the Parties' efforts, the current June 5, 2020, lay discovery deadline is
2 proving unrealistic for the aforementioned reasons. The Parties have agreed to address scheduling
3 of approximately 30 fact depositions late this month, depending on state quarantine orders, with
4 the hope that these depositions can be held (with the appropriate social distancing and health
5 precautions) in July and August. The Parties agree that each fact witness deposition will last the
6 entire seven-hour allowable time period, unless the Parties agree that additional time is necessary
7 for a particularly key witness.

8 Additionally, the Parties expect at least 14 expert depositions will occur after the fact
9 witnesses. Expert analysis and subsequent reports cannot be finalized until the parties complete
10 the fact witness depositions. The experts will rely upon written documentation and fact witness
11 deposition testimony. The Parties anticipate each expert will require a substantial amount of time
12 to complete their analysis and issue written reports. Each expert will need to review the reports of
13 other experts in order to develop any rebuttal reports per the Federal Rules. All of these activities
14 must occur before each expert sits for a deposition. As with the fact witnesses, the Parties
15 anticipate each expert deposition will last a full day.

16 The Parties have fully cooperated in developing and proceeding with discovery. However,
17 despite significant effort and cooperation, and as a result of the COVID-19 pandemic, the Parties
18 cannot accomplish the fact witness depositions and expert discovery under the current case
19 schedule. The Parties also cannot adequately prepare for a February 2021 trial.

20 Counsel have diligently collaborated on discovery, including deposition scheduling. While
21 reluctant to seek a second trial continuance, the Parties concur that a minimal continuance of
22 approximately five months would allow the Parties to efficiently complete discovery and properly
23 prepare for mediation and trial, given current expectations about the pandemic.

1 **III. AUTHORITY AND ARGUMENT**

2 LCR 16(b)(6) binds the Parties to the Court’s scheduling order after the Parties submit a
3 Joint Status Report. LCR 16 authorizes the Parties to move the Court to amend or modify the case
4 schedule upon a showing of good cause.

5 Due to the number of parties and number of counsel at different law firms, the complexity
6 of the facts and issues involved in the case, the number of fact witness depositions that the parties
7 will hold (some of which may be taken out of state), the number of expert witness depositions still
8 to be scheduled, and, of course, the extensive delay that has resulted due to the pandemic and Stay-
9 At-Home Order, the Parties agree that a continuance of the trial date is necessary. The Parties are
10 cooperating in good faith to complete the anticipated discovery in a timely and efficient manner.
11 The Parties have held several teleconferences to discuss written discovery and document
12 productions as well as scheduling depositions; the Parties continue to communicate collectively
13 and cooperatively regarding these issues.

14 Yet, complying with the current case schedule deadlines has become unrealistic given the
15 delay caused by the COVID-19 pandemic and related Stay-At-Home Orders.

16 The Parties, therefore, request the Court continue the trial date and amend the case schedule
17 (Dkt. Nos. 84, 85, 92, 97) as follows:

18 **Motions related to discovery filing deadline**

19 Current deadline: May 7, 2020

20 Requested deadline: October 14, 2020

21 **Lay discovery completed by**

22 Current deadline: June 5, 2020

23 Requested deadline: November 11, 2020

24 **Expert Disclosures pursuant to FRCP 26(a)(2)**

25 Current deadline: July 17, 2020

26 Requested deadline: December 16, 2020

1 **Service of Expert Rebuttal Reports pursuant to FRCP 26(a)(2)**

2 Current deadline: August 18, 2020

3 Requested deadline: January 20, 2021

4 **Commencement of expert depositions**

5 Current deadline: September 15, 2020

6 Requested deadline: February 16, 2021

7 **Expert discovery completed by**

8 Current deadline: November 6, 2020

9 Requested deadline: April 5, 2021

10 **All dispositive motions and motions challenging experts must be filed by**

11 Current deadline: November 19, 2020

12 Requested deadline: April 19, 2021

13 **Mediation Per LCR 39.1(c), if requested by the parties, held no later than**

14 Current deadline: December 31, 2020¹

15 Requested deadline: May 5, 2021

16 **All motions *in limine* must be filed by and noted on the motion calendar no later than**
17 **the THIRD Friday thereafter**

18 Current deadline: January 7, 2021

19 Requested deadline: June 8, 2021

20 **Agreed pretrial order due**

21 Current deadline: January 29, 2021

22 Requested deadline: June 30, 2021

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26 ¹ The Parties have discussed and do anticipate participating in a third mediation after key depositions have been taken and the Parties have more information upon which to base their respective settlement negotiations.

1 **Trial briefs, proposed *voir dire* questions, jury instructions, neutral statement of the**
2 **case, and trial exhibits due**

3 Current deadline: February 8, 2021

4 Requested deadline: July 6, 2021

5 **Jury trial date**

6 Current deadline: February 22, 2021

7 Requested deadline: July 26, 2021

8 **IV. CONCLUSION**

9 For the reasons stated above, the Parties jointly and respectfully request that this Court
10 grant their motion and continue the current trial date as well as the corresponding pretrial deadlines.

11 IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.

12 DATED this 28th day of May, 2020.

13 CAIRNCROSS & HEMPELMANN, P.S.

KEATING, BUCKLIN &
MCCORMACK, INC., P.S.

14 By: s/Terence J. Scanlan

By: s/Michael C. Walter

15 Terence J. Scanlan, WSBA #19498
16 Patricia A. Laughman, WSBA #46716
17 524 Second Avenue, Suite 500
18 Seattle, WA 98104-2323
19 Telephone: 206-623-6501
Facsimile: 206-447-1973
Email: tscanlan@cairncross.com
Email: plaughman@cairncross.com

Michael C. Walter, WSBA #15044
Jeremy W. Culumber, WSBA #35423
801 Second Avenue, Suite 1210
Seattle, WA 98104
Telephone: 206-623-8861
Email: mwalter@kbmlawyers.com
Email: jculumber@kbmlawyers.com

20 *Attorneys for the City of Issaquah*

Attorneys for the City of Issaquah

21 BROWN WHITE & OSBORN LLP

HARRIGAN LEYH FARMER &
THOMSEN LLP

22 By: s/Cynthia M. Cohen

By: s/Tyler L. Farmer

23 Cynthia M. Cohen, Admitted Pro Hac Vice
24 333 S. Hope Street, Suite 4000
25 Los Angeles, CA 90071
26 Telephone: 213-613-0500
Facsimile: 213-613-0550
E-Mail: ccohen@brownwhitelaw.com

Arthur W. Harrigan, WSBA #1751
Tyler L. Farmer, WSBA #39912
999 Third Avenue, Suite 4400
Seattle, WA 98104
Telephone: 206-623-1700
Facsimile: (206) 623-8717

STIPULATED MOTION AND ORDER TO CONTINUE
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CAIRNCROSS & HEMPELMANN, P.S.
ATTORNEYS AT LAW
524 Second Avenue, Suite 500
Seattle, Washington 98104-2323
office 206 587 0700 fax 206 587 2308

1 Attorneys for ORA Talus 90, LLC and Resmark
2 Equity Partners, LLC

Email: arthurh@harriganleyh.com
Email: tylerf@harriganleyh.com

3 Attorneys for ORA Talus 90, LLC and
4 Resmark Equity Partners, LLC

5 FOSTER GARVEY PC

STOEL RIVES LLP

6 By: s/Jack P. Zahner

By: s/Patrick Mullaney

7 Jack P. Zahner, WSBA #24505
8 1111 Third Avenue, Suite 3000
9 Seattle, WA 98101
Telephone: 206-689-8500
Email: jack.zahner@foster.com

Patrick Mullaney, WSBA #21982
600 University Street, Suite 3600
Seattle, WA 98101
Telephone: 206-624-0900
Facsimile: 206-386-7500
Email: Patrick.mullaney@stoel.com

10 Attorneys for J.R. Hayes & Sons, Inc, Talus 7 &
11 8, LLC, and Talus Management Services LLC

Attorneys for J.R. Hayes & Sons, Inc,
Talus 7 & 8, LLC, and Talus Management
Services LLC

12 PREG O'DONNELL & GILLET PLLC

13 By: s/Stephanie Ballard

14 John K. Butler, WSBA #28528
15 Stephanie Ballard, WSBA #49268
16 901 5th Avenue, Suite 3400
17 Seattle WA 98164
18 Telephone: 206-287-1775
Email: jbutler@pregodonnell.com
Email: sballard@pregodonnell.com

19 Attorneys for J.R. Hayes & Sons, Inc.

20 WILLIAMS, KASTNER & GIBBS PLLC

CLEMENT & DROTZ, PLLC

21 By: s/Theresa H. Rava

By: s/W. Scott Clement

22 Dean G. von Kallenbach, WSBA #12870
23 Theresa H. Rava, WSBA #53159
24 601 Union Street, Suite 4100
25 Seattle, WA 98101-2380
Telephone: 206-628-6600
Facsimile: 206-628-6611
Email: dvonkallenbach@williamskastner.com
Email: trava@williamskastner.com

W. Scott Clement, WSBA #16243
100 W. Harrison Street, Suite N350
Seattle, WA 98119
Telephone: 206-448-2565
Facsimile: 206-448-2235
Email: sclement@clementdrotz.com

Attorneys for Joshua Freed

26 STIPULATED MOTION AND ORDER TO CONTINUE
TRIAL DATE AND RELATED DEADLINES - 8

CAIRNCROSS & HEMPELMANN, P.S.
ATTORNEYS AT LAW
524 Second Avenue, Suite 500
Seattle, Washington 98104-2323
office 206 587 0700 fax 206 587 2308

1 *Attorneys for Element Residential Inc., Terra*
2 *Talus, LLC and Joshua Freed*

3 FORSBERG & UMLAUF, P.S.

WILSON SMITH COCHRAN
DICKERSON

4 By: s/Vicky L. Strada

5 A. Grant Lingg, WSBA #24227
6 Vicky L. Strada, WSBA #34559
7 901 Fifth Avenue, Suite 1400
8 Seattle, WA 98164
9 Telephone: 206-689-8500
Facsimile: 206-689-8501
Email: glingg@foum.law
Email: vstrada@foum.law

By: s/Brian Buron

Whitney L.C. Smith, WSBA #21159
Brian Buron, WSBA #27206
901 5th Ave., Suite 1700
Seattle, WA 98164-2050
Telephone: 206-623-4100
Facsimile: 206-623-9273
Email: smithw@wscd.com
Email: buron@wscd.com

10 *Attorneys for Terra Associates, Inc.*

Attorneys Terra Talus, LLC

11 OLES MORRISON RINKER & BAKER LLP

FLOYD PFLUEGER & RINGER, P.S.

12 By: s/Bradley L. Powell

13 Bradley L. Powell, WSBA #11158
14 701 Pike Street, Suite 1700
15 Seattle, WA 98101
16 Telephone: 206-623-3427
Email: powell@oles.com

By: s/Douglas K. Weigel

Douglas K. Weigel, WSBA #27192
Amanda D. Daylong, WSBA #48013
200 W. Thomas Street, Suite 500
Seattle, WA 98119
Telephone: 206-441-4455
Email: dweigel@floyd-ringer.com
Email: adaylong@floyd-ringer.com

17 *Attorneys for Kulchin Foundation Drilling*
18 *Company*

Attorneys for Big Mountain Enterprises

19
20
21
22
23
24
25
26
STIPULATED MOTION AND ORDER TO CONTINUE
TRIAL DATE AND RELATED DEADLINES - 9

CAIRNCROSS & HEMPELMANN, P.S.
ATTORNEYS AT LAW
524 Second Avenue, Suite 500
Seattle, Washington 98104-2323
office 206 587 0700 fax 206 587 2308

ORDER

PURSUANT TO THE STIPULATED MOTION, IT IS SO ORDERED.

DATED this 3rd day of June, 2020.



RICARDO S. MARTINEZ
CHIEF UNITED STATES DISTRICT JUDGE

Presented by:

CAIRNCROSS & HEMPELMANN, P.S.

KEATING, BUCKLIN &
MCCORMACK, INC., P.S.

By: s/Terence J. Scanlan

By: s/Michael C. Walter

Terence J. Scanlan, WSBA #19498
Patricia A. Laughman, WSBA #46716
524 Second Avenue, Suite 500
Seattle, WA 98104-2323
Telephone: 206-623-6501
Facsimile: 206-447-1973
Email: tscanlan@cairncross.com
Email: plaughman@cairncross.com

Michael C. Walter, WSBA #15044
Jeremy W. Culumber, WSBA #35423
801 Second Avenue, Suite 1210
Seattle, WA 98104
Telephone: 206-623-8861
Email: mwalter@kbmlawyers.com
Email: jculumber@kbmlawyers.com

Attorneys for the City of Issaquah

Attorneys for the City of Issaquah

BROWN WHITE & OSBORN LLP

HARRIGAN LEYH FARMER &
THOMSEN LLP

By: s/Cynthia M. Cohen

By: s/Tyler L. Farmer

Cynthia M. Cohen, Admitted Pro Hac Vice
333 S. Hope Street, Suite 4000
Los Angeles, CA 90071
Telephone: 213-613-0500
Facsimile: 213-613-0550
E-Mail: ccohen@brownwhitelaw.com

Arthur W. Harrigan, WSBA #1751
Tyler L. Farmer, WSBA #39912
999 Third Avenue, Suite 4400
Seattle, WA 98104
Telephone: 206-623-1700
Facsimile: (206) 623-8717
Email: arthurh@harriganleyh.com
Email: tylerf@harriganleyh.com

*Attorneys for ORA Talus 90, LLC and Resmark
Equity Partners, LLC*

STIPULATED MOTION AND ORDER TO CONTINUE
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CAIRNCROSS & HEMPELMANN, P.S.
ATTORNEYS AT LAW
524 Second Avenue, Suite 500
Seattle, Washington 98104-2323
office 206 587 0700 fax 206 587 2308

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26

*Attorneys for ORA Talus 90, LLC and
Resmark Equity Partners, LLC*

FOSTER GARVEY PC

STOEL RIVES LLP

By: s/Jack P. Zahner
Jack P. Zahner, WSBA #24505
1111 Third Avenue, Suite 3000
Seattle, WA 98101
Telephone: 206-689-8500
Email: jack.zahner@foster.com

By: s/Patrick Mullaney
Patrick Mullaney, WSBA #21982
600 University Street, Suite 3600
Seattle, WA 98101
Telephone: 206-624-0900
Facsimile: 206-386-7500
Email: Patrick.mullaney@stoel.com

*Attorneys for J.R. Hayes & Sons, Inc, Talus 7 &
8, LLC, and Talus Management Services LLC*

*Attorneys for J.R. Hayes & Sons, Inc,
Talus 7 & 8, LLC, and Talus Management
Services LLC*

PREG O'DONNELL & GILLET PLLC

By: s/Stephanie Ballard
John K. Butler, WSBA #28528
Stephanie Ballard, WSBA #49268
901 5th Avenue, Suite 3400
Seattle WA 98164
Telephone: 206-287-1775
Email: jbutler@pregodonnell.com
Email: sballard@pregodonnell.com

Attorneys for J.R. Hayes & Sons, Inc.

WILLIAMS, KASTNER & GIBBS PLLC

CLEMENT & DROTZ, PLLC

By: s/Theresa H. Rava
Dean G. von Kallenbach, WSBA #12870
Theresa H. Rava, WSBA #53159
601 Union Street, Suite 4100
Seattle, WA 98101-2380
Telephone: 206-628-6600
Facsimile: 206-628-6611
Email: dvonkallenbach@williamskastner.com
Email: trava@williamskastner.com

By: s/W. Scott Clement
W. Scott Clement, WSBA #16243
100 W. Harrison Street, Suite N350
Seattle, WA 98119
Telephone: 206-448-2565
Facsimile: 206-448-2235
Email: sclement@clementdrotz.com

Attorneys for Joshua Freed

*Attorneys for Element Residential Inc., Terra
Talus, LLC and Joshua Freed*

STIPULATED MOTION AND ORDER TO CONTINUE
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CAIRNCROSS & HEMPELMANN, P.S.
ATTORNEYS AT LAW
524 Second Avenue, Suite 500
Seattle, Washington 98104-2323
office 206 587 0700 fax 206 587 2308

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25
26

FORSBERG & UMLAUF, P.S.

By: s/Vicky L. Strada
A. Grant Lingg, WSBA #24227
Vicky L. Strada, WSBA #34559
901 Fifth Avenue, Suite 1400
Seattle, WA 98164
Telephone: 206-689-8500
Facsimile: 206-689-8501
Email: glingg@foum.law
Email: vstrada@foum.law

Attorneys for Terra Associates, Inc.

OLES MORRISON RINKER & BAKER LLP

By: s/Bradley L. Powell
Bradley L. Powell, WSBA #11158
701 Pike Street, Suite 1700
Seattle, WA 98101
Telephone: 206-623-3427
Email: powell@oles.com

*Attorneys for Kulchin Foundation Drilling
Company*

WILSON SMITH COCHRAN
DICKERSON

By: s/Brian Buron
Whitney L.C. Smith, WSBA #21159
Brian Buron, WSBA #27206
901 5th Ave., Suite 1700
Seattle, WA 98164-2050
Telephone: 206-623-4100
Facsimile: 206-623-9273
Email: smithw@wscd.com
Email: buron@wscd.com

Attorneys Terra Talus, LLC

FLOYD PFLUEGER & RINGER, P.S.

By: s/Douglas K. Weigel
Douglas K. Weigel, WSBA #27192
Amanda D. Daylong, WSBA #48013
200 W. Thomas Street, Suite 500
Seattle, WA 98119
Telephone: 206-441-4455
Email: dweigel@floyd-ringer.com
Email: adaylong@floyd-ringer.com

Attorneys for Big Mountain Enterprises

STIPULATED MOTION AND ORDER TO CONTINUE
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CAIRNCROSS & HEMPELMANN, P.S.
ATTORNEYS AT LAW
524 Second Avenue, Suite 500
Seattle, Washington 98104-2323
office 206 587 0700 fax 206 587 2308

Certificate of Service

I, Kelsey M. Doyle, certify under penalty of perjury of the laws of the State of Washington that on May 28, 2020, I electronically filed this document entitled STIPULATED MOTION AND [PROPOSED] ORDER TO CONTINUE TRIAL DATE AND RELATED DEADLINES using the CM/ECF system which will send notification of such filing to all attorneys of record.

DATED this 28th day of May, 2020, at Seattle, Washington.

s/Kelsey M. Doyle

Kelsey M. Doyle, Paralegal
CAIRNCROSS & HEMPELMANN, P.S.
524 Second Avenue, Suite 500
Seattle, WA 98104-2323
Telephone: (206) 254-4483
Facsimile: (206) 587-2308
E-mail: kdoyle@cairncross.com