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KING COUNTY  
SUPERIOR COURT CLERK  
KENT, WA

Hon. Jay V. White

SUPERIOR COURT OF WASHINGTON FOR KING COUNTY

LOUIE J. DeGROOT, DARLENE I.  
DeGROOT, KEVIN L. DeGROOT, and  
TRISHA L. DeGROOT,

Plaintiffs,

vs.

RICHARD WILLIS BATHUM and JANE DOE  
BATHUM, his wife, and the marital community  
comprised thereof,

Defendants.

NO. 00-2-32614-9 KNT

DECLARATION OF SAM B. FRANKLIN IN  
SUPPORT OF SEALING FILE

Sam B. Franklin, being first duly sworn upon oath deposes and says:

I am counsel of record for the defendants Bathum and make the following declaration on their behalf and in support of their motion in support of his Motion to Seal the File, which motion is not resisted by plaintiffs. The following declaration is made upon personal knowledge.

1. Events complained of and set forth in the Complaint occurred in the Summer of 2000 when the defendant, Richard Bathum was a practicing attorney in Enumclaw, Washington. He is now a sitting judge in the Aukeen District Court having been appointed in the Fall of 2000.

2. The complaint sets forth a number of allegations of alleged dereliction by Mr. Bathum. Mr. Bathum has, from the beginning, conceded that he fell below the standard of care in representing the plaintiffs in that he did not comply with the King County Superior Court Case Scheduling Order which did in fact result in exclusion of witnesses and exhibits. It is, however, his belief then and now that some of the other factual allegations are not correct and that those allegations would cast him in a false light.

(759156 DOC)

DECLARATION OF SAM B. FRANKLIN IN SUPPORT OF  
SEALING FILE - 1

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