

No. 45165-4-II

COURT OF APPEALS, DIVISION II  
OF THE STATE OF WASHINGTON

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In Re the Personal Restraint of:

**Raymond Garland,**

Petitioner.

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Pierce County Superior Court Cause No. 04-1-05384-8

The Honorable Judge Thomas J. Felnagle

**Petitioner's Reply to  
Supplemental Response Brief**

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## ARGUMENT

### **I. THE COURT OF APPEALS SHOULD NOT APPLY THE RELITIGATION BAR TO MATTERS THAT HAVE NOT BEEN LITIGATED.**

In his direct appeal, Mr. Garland did not raise ineffective assistance of counsel (IAC). Accordingly, the relitigation bar does not apply to his IAC claims in this Personal Restraint Petition. *See In re Yates*, 177 Wn.2d 1, 33, 296 P.3d 872 (2013).<sup>1</sup>

Without citation to authority, Respondent erroneously suggests that Mr. Garland should have raised his ineffective assistance claims on direct appeal.<sup>2</sup> Supp. Response, p. 3. Respondent is simply wrong.

Had Mr. Garland raised ineffective assistance on direct appeal (as Respondent suggests), he would have risked forfeiting any related IAC claims that required information from outside the record, and thus could be raised only through a PRP.<sup>3</sup> Nothing required him to take that risk, and he is not barred from raising ineffective assistance in this PRP.

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<sup>1</sup> Under the relitigation bar, “[a] claim rejected on its merits on direct appeal will not be reconsidered in a subsequent personal restraint petition unless the petitioner shows that the ends of justice would be served thereby.” *Id.*, at 33-34 (quoting *In re Pers. Restraint of Jeffries*, 114 Wn.2d 485, 487, 789 P.2d 731 (1990)).

<sup>2</sup> Where no authority is cited, Respondent is presumed to have found none after diligent search. *In re Griffin*, 181 Wn. App. 99, 107, 325 P.3d 322 (2014).

<sup>3</sup> Such a procedural default would have barred him from raising such claims in federal court. 28 U.S.C. §2254; *Wade v. Timmerman-Cooper*, No. 12-4229, 2015 WL 2151753, at \*7 (6th Cir. May 8, 2015).

The court should reject Respondent's unsupported suggestion. The relitigation bar does not apply to matters that have not been litigated.

**II. THE CASE MUST BE TRANSFERRED TO SUPERIOR COURT FOR A REFERENCE HEARING REGARDING COREY'S FAILURE TO COMMUNICATE THE STATE'S PLEA OFFER.**

A. The petition cannot be resolved on the record and must be transferred to the superior court.

Mr. Garland and his former attorney (Barbara Corey) have made conflicting assertions about a pretrial plea offer made on November 21 and reaffirmed by the prosecutor on November 25, 2008.<sup>4</sup> Mr. Garland says that Corey never communicated this 2008 pretrial plea offer to him. He would have taken the offer had he learned of it. Decl. of Raymond Garland (dated 11/12/14); App., p. 1.

Corey does not specifically address the 2008 plea offer. Supp. Response, App. A. At one point, she implies that she conveyed multiple plea offers,<sup>5</sup> but gives no specifics as to the offers, when she communicated them to him, or what advice she purportedly gave regarding each offer.<sup>6</sup> Supp. Response, App. A, pp. 4, 6, 7.

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<sup>4</sup> An email reflecting the offer was attached to the prosecutor's initial response to the petition. State's Response to Personal Restraint Petition (Response), App. D Ex. 1.

<sup>5</sup> Elsewhere, she suggests the prosecution made only one offer, in 2009, after Mr. Garland's conviction. Supp. Response, App.A, pp. 6-7.

<sup>6</sup> Corey kept her entire file at the office of the defense investigator. The file was destroyed. Supp. Response, App. A, pp. 3,5.

When a personal restraint petition “cannot be determined solely on the record,” it will be transferred to the superior court “for a determination on the merits or for a reference hearing.” RAP 16.11(b). Mr. Garland and his former attorney have made conflicting assertions. Thus, his personal restraint petition cannot be determined solely on the record.

The Chief Judge should transfer the case to the superior court for a determination on the merits or for a reference hearing. RAP 16.11(b).

B. Mr. Garland has made a *prima facie* showing that Corey failed to communicate the 2008 pretrial plea offer.

When a PRP relies on matters outside the record, the petitioner must demonstrate that he has competent admissible evidence to establish facts entitling him to relief. *Yates*, 177 Wn.2d at 18. Mr. Garland has such evidence. To make a *prima facie* showing for a reference hearing, the petitioner may present witness affidavits and/or other evidence corroborating what a witness will reveal if subpoenaed.<sup>7</sup> *Id.* Here, Mr. Garland has independent evidence supporting his position and undermining Corey’s assertions that she conveyed the 2008 pretrial plea offer.

1. Corey did not convey the 2008 pretrial offer in person.

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<sup>7</sup> The corroboration must be more than mere speculation or conjecture. *Id.*

Corey says that Bob Crow, the defense investigator, was present with her and Mr. Garland every time she “carefully and thoroughly discussed every plea offer with Mr. Garland.” Supp. Response, App. A, p. 7. She also avers that she never visited Mr. Garland without the investigator, and relied on him to take “detailed notes of the meeting.” Supp. Response, App. A, pp. 3, 7.

If this is true, then independent evidence confirms that she did not communicate the 2008 plea offer to Mr. Garland in person.

First, Corey’s own billing records show that her last visit to Mr. Garland prior to trial occurred on June 20, 2008. She did not visit him again until more than a year later (November 4, 2009), after he’d been convicted. App., pp. 69-74.

Second, jail records confirm that Mr. Garland had no professional visits between November 13, 2008, and January 30<sup>th</sup>, 2009.<sup>8</sup> App., pp. 65-68.

Third, a detailed invoice created by Crow shows no visits of any kind between October 31, 2008 (when Crow visited Mr. Garland on his

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<sup>8</sup> Jail records of inmate phone calls from 2008 have since been destroyed. App., pp. 60-63.

own to obtain a signature) and July 27, 2009 (when Crow reviewed discovery with Mr. Garland prior to the third trial). App., pp. 75-117.<sup>9</sup>

2. Corey did not convey the 2008 pretrial offer by telephone.

Corey says she “spoke with Ray over the phone often.” Supp. Response, App. A, p. 4. Her billing records indicate that they talked on the phone only twice in 2008: once on March 31, and once on December 12. App., pp. 70-74.

After receiving the emailed offer from the prosecutor on November 21, she did not speak with Mr. Garland by telephone for three weeks. During those three weeks, she continued working on the case, but did not go see him or talk to him by telephone.<sup>10</sup>

3. Corey did not discuss the 2008 pretrial offer with Mr. Garland’s family, even though she spoke frequently with his mother.

Mr. Garland’s two siblings and his mother did not learn of the plea offer until after his conviction. App., pp. 75, 118. All three met with the

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<sup>9</sup> This is consistent with Corey’s own billing records, which suggest that her last jail visit prior to the August 2009 trial took place on June 20, 2008. App., pp. 70-74. It is also consistent with the jail visit logs, which show no visits between November 13, 2008 and January 30, 2009. App., pp. 70-74.

<sup>10</sup> Her billing records show that she made a half-hour telephone call to Mr. Garland’s mother, spent nearly 2½ hours on “Briefing and preparation for motions,” and spent ¾ hour in court. App., pp. 70-74. Even after the December 5<sup>th</sup> court appearance, it took her another week to contact him by telephone, according to her billing records. App., pp. 70-74. There was no reference to work on a plea or discussion of one.

prosecutor after trial. That was the first time they'd heard of the offer.

App., pp. 75, 118.

This is especially significant with regard to Mr. Garland's mother, Margaret Cook. Corey obtained explicit permission to speak directly with Ms. Cook about "all aspects of the case."<sup>11</sup> Supp. Response, Ap. A, p. 3. Corey's billing records show that in 2008 she met with Ms. Cook twice in person. That year, they also spoke by phone 10 times, and Corey sent Ms. Cook an email. App., pp. 70-74.

The defense investigator also communicated frequently with Ms. Cook. In 2008, he met with her twice and called her ten times. App., pp. 75-117. In her declaration, Corey also confirms that she and Crow had "hundreds of conversations" with Ms. Cook, both "jointly and separately." Supp. Response, App. A, p. 3. Despite all this contact, Cook did not learn of the plea offer until after her son had been convicted. App., p. 75.

4. No records show that Corey communicated the 2008 pretrial plea offer, or that Mr. Garland rejected it.

Respondent presents no information corroborating the claim that Corey conveyed the 2008 pretrial offer. Her 2008 emails to the prosecutor do not indicate that she told her client of the offer or that he rejected it.

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<sup>11</sup> Ms. Cook paid for her son's defense. Supp. Response, App. A, p. 2, 4.

State’s Response to Personal Restraint Petition (“Response”), Ex. 1. She told the prosecutor she could “sell” her counter-offer (a plea to manslaughter), but did not claim Mr. Garland had already rejected the original offer. Response, Ex. 1.

Nor does Respondent present contemporaneous notes from Corey’s file. Corey apparently kept no physical file; instead, she relied on her investigator to keep a physical file containing discovery and other written materials. App., pp. 6-9, 56-59. The investigator is deceased, and his files were destroyed. App., pp. 7, 58-59; Supp. Response, App. A, pp. 3, 5. Corey’s own computer records—recovered from a damaged hard drive—include nothing prior to 2009. App., pp. 6-9, 56-59.

Respondent does not submit information from Corey’s staff or others who might have known that she conveyed the offer.

5. The Chief Judge should transfer the case to the superior court to determine whether Corey communicated the 2008 pretrial plea offer to her client.

Mr. Garland and Corey make opposing claims regarding whether or not Corey communicated the 2008 pretrial plea offer. Thus far, the objective record favors Mr. Garland’s position. The Chief Judge should transfer the case to the superior court for a reference hearing (or to decide the merits). The superior court should have the opportunity to supervise

discovery, hear testimony, decide matters of credibility, and resolve disputed issues of fact. RAP 16.11(b).

C. Mr. Garland has established a reasonable probability that he would have accepted the 2008 pretrial plea offer.

Mr. Garland is entitled to reversal of his conviction if he shows a reasonable probability of a different outcome absent counsel's deficient performance. *Strickland v. Washington*, 466 U.S. 668, 694, 104 S.Ct. 2052, 80 L.Ed.2d 674 (1984). All that is necessary is diminished confidence in the outcome. *Kovacs v. United States*, 744 F.3d 44, 51 (2d Cir. 2014) (citing *Strickland*).

Mr. Garland asserts that he would have accepted the plea offer had it been communicated. App., pp. 1-2. Under federal law, this establishes prejudice: the *Strickland* standard "impose[s] no requirement that the defendant meet his burden of proof through objective evidence." *Magana v. Hofbauer*, 263 F.3d 542, 548 n. 1 (6th Cir. 2001); see also *Lafler v. Cooper*, 132 S.Ct. 1376, 1391, 182 L. Ed. 2d 398 (2012) (citing *Cooper v. Lafler*, 376 F. App'x 563, 571-572 (6th Cir. 2010)).<sup>12</sup>

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<sup>12</sup> In the alternative, a significant sentencing disparity, such as that presented here, constitutes objective evidence that establishes prejudice. See *United States v. Brown*, 623 F.3d 104, 112 (2d Cir. 2010) (citing *Pham v. United States*, 317 F.3d 178, 182 (2d Cir. 2003)); *Mask v. McGinnis*, 233 F.3d 132, 142 (2d Cir. 2000). Here, the sentencing disparity between the plea offer and the sentence imposed was more than ten years in prison.

Corey asserts that Mr. Garland would never have accepted the plea bargain.<sup>13</sup> Supp. Response, App. A, p. 4, 6, 7. These conflicting claims mean the issue cannot be resolved on the existing record. The Court of Appeals should transfer the case for a reference hearing or for determination on the merits. RAP 16.11(b).

Furthermore, the record does not support Corey's assertions.

1. Corey's declaration misrepresents the 2008 pretrial plea offer.

Corey erroneously asserts that the state's offer would have reduced Mr. Garland's sentence by only 18 months. Supp. Response, App. A, p. 7. This is incorrect.<sup>14</sup>

Mr. Garland went to trial on a charge of first-degree murder. At the time the offer was made, he was facing a mandatory minimum of 240 months and a standard range of 387-484 months.<sup>15</sup> See former RCW 9.94A.540 (2004); former RCW 9.94A.510 (2004); former RCW

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<sup>13</sup> This suggests the reason she failed to communicate the offer: she believed he would never have accepted it.

<sup>14</sup> Corey's 18-month figure involves several errors. She appears to have confused the 2008 pretrial offer with the prosecutor's post-trial offer for a package deal. The post-trial offer would have resolved a separate matter if Mr. Garland agreed to waive appeal on this case. The post-trial proposal included an agreed recommendation of 362 months for the murder conviction, which is 16 months *greater* than the sentence imposed by the court. Supp. Response, Attachment to App. A. Corey misquotes the offer (claiming it was for 365 months) and the sentence imposed by the court (claiming it was 380 months). Supp. Response, App. A, p. 7. Even using these figures, her 18-month figure is off by 3 months.

<sup>15</sup> This assumes an offender score of five, and includes the firearm enhancements.

9.94A515 (2004). Had the court sentenced Mr. Garland under the prosecutor's offer,<sup>16</sup> Mr. Garland would have received only 225 months—13½ years below the low end of the standard range.<sup>17</sup> Response, Ex. 1.

This 13½ year difference is “a significant sentencing disparity.” *Pham*, 317 F.3d at 182.<sup>18</sup> It is much greater than the 18-month period reflected by Corey's calculations. Supp. Response, App. A, p. 7. A person in Mr. Garland's position might well have risked going to trial under Corey's miscalculated disparity. The same person would be more likely to consider a guilty plea that would save 13½ years in prison and a conviction for first-degree murder. *Id.*

2. Respondent provides no letters, notes, memoranda, or other evidence confirming Corey's assertions about Mr. Garland's position.

As noted above, documentary evidence shows that Corey neither visited nor telephoned Mr. Garland for three weeks after receiving the 2008 plea offer. App., pp. 70-74. Furthermore, she has no letters, notes,

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<sup>16</sup> It is highly likely the court would have followed the recommendation of the prosecuting attorney, especially since the offer was vetted by senior prosecuting staff. Response, Ex. 1. See Petitioner's Supp. Opening Brief, p 2.

<sup>17</sup> Following trial, the court sentenced him for second-degree murder, second-degree assault, and unlawful possession of a firearm, imposing a total sentence of 346 months. CP 162-175.

<sup>18</sup> In *Pham*, the defendant was sentenced to 17½ years after rejecting a plea offer of 5-8 years. *Id.*, at 181-182.

memoranda, or other material documenting any conversation about this plea offer.<sup>19</sup>

Nor does she have any materials supporting her assertion that Mr. Garland “always told [her] that he would never plead guilty to a murder charge [and that he] never budged from that position.” Supp. Response, App. A p. 7; *see also* pp. 4, 6.<sup>20</sup>

Mr. Garland disputes Corey’s claim that he would never have pled guilty to murder.<sup>21</sup> App., pp. 1-2. Having endured two mistrials, he knew that the government’s case was strong. He was concerned about the financial burden on his family. He was worried about a conviction for first-degree murder. He saw a difference between intentional murder and felony murder, and would have taken a plea to felony murder. App., pp. 1-2.

Likewise, Mr. Garland’s mother confirms her belief that her son would have taken the offer, had it been communicated. App., p. 75.

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<sup>19</sup> Corey apparently kept no physical file; instead, she shared her investigator’s file. Crow passed away and his files were destroyed; thus, there is no documentation supporting Corey’s assertions. App., pp. 6-9, 56-59; Supp. Response, App. A, pp. 3, 5.

<sup>20</sup> Corey also asserts that Mr. Garland refused to plead guilty to two strikes, but then makes clear she explained to him that he would not have two strikes if he pled guilty. Supp. Response, App. A, p. 6.

<sup>21</sup> Although he may have taken that position initially, he changed his mind after two mistrials. App., pp. 1-2.

3. The Chief Judge should transfer the case to the superior court to determine whether there is a reasonable probability the outcome would have differed.

Mr. Garland swears that he would have accepted the plea had Corey communicated it. App., pp. 1-2. He sat through two mistrials before Corey received the offer. He faced a significant sentencing disparity between the offer and the sentence he risked by going trial. The offer was also for ten years less than he actually received after conviction.

Corey claims that Mr. Garland would never have accepted the offer. Her declaration misrepresents the offer, and no objective evidence supports her position. The Chief Judge should remand the case for a reference hearing or a decision on the merits. This will enable the superior court to make findings of fact regarding these disputed matters. RAP 16.11(b).

**III. COREY’S LACK OF CANDOR TOWARD THE TRIBUNAL, HER VIOLATION OF DISCOVERY OBLIGATIONS, AND HER FAILURE TO RESEARCH RELEVANT LAW DENIED MR. GARLAND THE EFFECTIVE ASSISTANCE OF COUNSEL.**

- A. Corey’s misconduct toward the court and opposing counsel constituted deficient performance.

To prevail on an ineffective assistance claim, a defendant must show deficient performance and prejudice. *State v. Jones*, No. 85236-7, 2015 WL 3646445, at \*1 (Wash. June 11, 2015). Corey provided deficient performance that prejudiced Mr. Garland.

An attorney's performance is deficient if it falls below an objective standard of reasonableness. *Id.*, at \*5. Here, defense counsel's performance fell below an objective standard of reasonableness: Corey unreasonably misled the prosecutor and the judge and violated her discovery obligations.

Generally, an ethical violation does not necessarily establish ineffective assistance. *Nix v. Whiteside*, 475 U.S. 157, 165, 106 S.Ct. 988, 89 L.Ed.2d 123 (1986). However, where ethical standards "speak with one voice,"<sup>22</sup> departure from the standards is unreasonable. *McClure v. Thompson*, 323 F.3d 1233, 1242 (9th Cir. 2003).

Ethical standards speak with one voice when it comes to the duty of candor toward the tribunal. *See* Petitioner's Supp. Opening Brief, pp. 25-29 (citing, *inter alia*, RPC 3.3). The same is true regarding counsel's general obligation to act fairly and honestly toward opposing counsel. *See* Petitioner's Supp. Opening Brief, pp. 25-29 (citing, *inter alia*, RPC 3.4 and RPC 8.4).

Corey violated these ethical standards when she responded dishonestly to the judge's direct questions about the defense case. RP (8/10/09) 133-134. She also violated these standards (and her discovery

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<sup>22</sup> *Nix* 475 U.S. at 166.

obligations) by failing to disclose the general nature of the defense. Because the standards “speak with one voice,” her unethical behavior constituted deficient performance. *McClure*, 323 F.3d at 1242.

Respondent does not contend that Corey complied with her ethical obligations. Supp. Response, pp. 5-6. Nor does Respondent suggest that the ethical standards are less than universal. Supplemental Response, pp. 5-6. Respondent’s lack of argument on these points can be treated as a concession. *In re Pullman*, 167 Wn.2d 205, 212 n.4, 218 P.3d 913 (2009).

Instead, Respondent erroneously attempts to excuse Corey’s behavior as a “misplaced or unsuccessful strategy.” Supp. Response, pp. 5-6. But Corey’s misconduct cannot be characterized as a legitimate trial strategy.

Any trial strategy must be based on reasoned decision-making. *In re Hubert*, 138 Wn. App. 924, 929, 158 P.3d 1282 (2007). Corey’s strategy of deceiving the court and violating her discovery obligations was not based on reasoned decision-making.

Respondent does not claim that Corey’s conduct was a *legitimate* strategy. Supp. Response, pp. 5-6.<sup>23</sup> Respondent’s lack of argument on that issue can be treated as a concession. *Pullman*, 167 Wn.2d at 212 n.4.

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<sup>23</sup> Instead, Respondent characterizes her actions as “misplaced,” an “unsuccessful strategy,” and concedes they “may be unethical and subject to discipline.” Supp. Response, pp. 5-6.

Nor does Respondent cite any authority suggesting that a legitimate strategy may rest on violation of ethical rules.<sup>24</sup> Response, p. 6. This court can presume that Respondent found no such authority after diligent search. *Griffin*, 181 Wn. App. at 107. Furthermore, since counsel provides deficient performance by violating ethical standards that are universally accepted, it follows that no legitimate trial strategy can rest on such a violation. *McClure*, 323 F.3d at 1242.

Corey's misconduct fell below an objective standard of reasonableness. *Id.* Mr. Garland has established the first prong of his ineffective assistance claim.

B. Corey's failure to research the law constituted deficient performance.

An attorney's failure to research relevant law falls below an objective standard of reasonableness. *State v. Kyllo*, 166 Wn.2d 856, 862, 215 P.3d 177 (2009). Here, Corey failed to research longstanding precedent allowing impeachment of the accused with counsel's prior statements.

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<sup>24</sup>Respondent correctly points out that violation of ethical norms is not ineffective *per se*. Brief of Respondent, p. 6 (citing *Burt v. Titlow*, 134 S.Ct. 10, 18, 187 L.Ed.2d 348 (2013) and *Mickens v. Taylor*, 535 U.S. 162, 171, 122 S.Ct. 1237, 152 L.Ed.2d 291 (2002)). This does not mean that a legitimate trial strategy may rest on violation of ethical rules.

An accused person can be impeached with counsel's prior statements. *State v. Rivers*, 129 Wn.2d 697, 708-09, 921 P.2d 495 (1996); *see also State v. Dault*, 19 Wn. App. 709, 717-18, 578 P.2d 43 (1978); *State v. Acosta*, 34 Wn. App. 387, 391-92, 661 P.2d 602 (1983) *reversed on other grounds at* 101 Wn.2d 612, 683 P.2d 1069 (1984). This includes inconsistent statements made during opening. *Rivers*, 129 Wn.2d at 708-709.

Despite this decades-long history of impeachment with prior statements by counsel, Corey expressed her surprise when the prosecutor sought to do so in this case. RP (9/23/09) 3032-3036; RP (10/8/09) 3718-3722, 3727-3731, 3744. Had Corey conducted even minimal research, she would have realized that springing an inconsistent theory in the middle of Mr. Garland's third trial implicated this kind of impeachment. Her failure to research the law constituted deficient performance.

Respondent attempts to excuse Corey's failure to research the law by claiming that "this state of the law was not always so clear." Supp. Response, p. 6. Respondent's retroactive claim of legal murkiness is in direct contrast to their position at trial: at trial, the prosecution characterized the law as "well settled," and added that the rule "has been repeatedly reaffirmed." CP 44-45.

In addition, more than a decade prior to Mr. Garland’s third trial, the Supreme Court upheld a trial court ruling under nearly identical circumstances. *Rivers*, 129 Wn.2d at 708-709. The *Rivers* court pointed out that

Defendant *Rivers* was present when his attorney, in opening statement, explained to the jury that this was a case of mistaken identity... The trial court did not abuse its discretion in allowing cross examination of the Defendant about his counsel's opening statement under the facts of this case.

*Id.*

The only issue that was arguably of “first impression”<sup>25</sup> at the time of Mr. Garland’s third trial was whether the rule—clearly set forth in *Rivers*—applied equally to statements made by counsel in prior trials. Absent some repudiation of the prior statement, there is little reason to suppose *Rivers* would have been decided differently if counsel’s statement had been made during a prior trial.<sup>26</sup>

Furthermore, even if the “state of the law was not always so clear,”<sup>27</sup> this would not excuse Corey from undertaking basic research to

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<sup>25</sup> Supp. Response, p. 7 (citing *State v. Garland*, 169 Wn. App. 869, 875, 282 P.3d 1137 (2012)).

<sup>26</sup> Furthermore, counsel could easily have located cases from other jurisdictions, such as the second circuit opinion relied upon by the Court of Appeals in Mr. Garland’s appeal. *Id.*, at 889-894 (citing *United States v. McKeon*, 738 F.2d 26 (2d Cir. 1984)).

<sup>27</sup> Supplemental Response, p. 6.

ascertain the prevailing opinion (set forth in *Rivers*, *Dault*, and *Acosta*.)

Corey should not have been surprised by the court's ruling.

In addition, Corey might have avoided *Rivers* by complying with her ethical duty of candor and her discovery obligations, as suggested by the *Acosta* court, which allowed the impeachment where "the defense had not notified the court or counsel" of a change in the defense. *Acosta*, 34 Wn. App. at 392.

Corey's failure to research relevant law fell below an objective standard of reasonableness.

C. Defense counsel's failures prejudiced Mr. Garland.

There is a "reasonable probability" that Corey's deficient performance affected the outcome. *State v. Jones*, No. 85236-7, 2015 WL 3646445, at \*5 (Wash. June 11, 2015). Mr. Garland's burden to show prejudice is "less than a more likely than not standard." *Id.* He has met that burden here.

If Corey had been candid in disclosing the general nature of Mr. Garland's defense, the trial court would likely have rejected the proposed impeachment. *See Acosta*, 34 Wn. App. at 392 (suggesting that impeachment was proper because defense failed to notify the court and opposing counsel of the changed defense.) The court's remarks show

concern about the prejudice to the state caused by Corey's dishonesty. *See* RP (9/29/09) 3123; RP (10/8/09) 3724-3727, 3745, 3748, 3779-3783.

The impeachment presented Mr. Garland (and his lawyer) in a negative light. After hearing that he'd presented a different defense in prior proceedings, jurors likely elected to ignore everything he said and everything Corey said. There is a reasonable probability that the impeachment affected the outcome. The impeachment would likely not have happened if Corey had been truthful when asked direct questions about the general nature of the defense prior to the start of trial.

It is irrelevant that the jury remained ignorant of Corey's misrepresentations. *See* Supplemental Response, p. 6. The impact on the jury stemmed from the trial court's decision to allow the impeachment. This discretionary decision turned on Corey's lack of candor. The trial court exercised its discretion and allowed the impeachment out of concern that Corey's dishonesty might unfairly prejudice the prosecution. *See* RP (9/29/09) 3123; RP (10/8/09) 3724-3727, 3745, 3748, 3779-3783.

Corey's failure to research relevant law also prejudiced Mr. Garland. Had she properly researched the law, she would have been able to competently represent Mr. Garland. Her obvious lack of knowledge had a severe impact on the defense, resulting in impeachment of her client's own testimony with inconsistent statements that she herself had made.

With a proper understanding of the law, Corey would have replied honestly when the court asked direct questions about the general nature of the defense (to minimize the risk that her client would be impeached with the prior inconsistent opening statements). *Acosta*, 34 Wn. App. at 392. Furthermore, a proper understanding of the law would have allowed Corey to explain to Mr. Garland the risks of taking the witness stand and presenting evidence contradicting her opening statements. Had Corey understood the law, she might have pursued a different defense at the third trial, or, indeed, she might not have made prior statements contradicting her client's own version of events.<sup>28</sup>

Contrary to Corey's declaration and Respondent's assertion, Mr. Garland was not "aware of the risks of changing the [trial] strategy." First, Mr. Garland disputes that Corey warned him about any risks associated with a change in strategy. App., pp. 1-2. Second, Corey herself was not aware of the risks and thus could not properly advise Mr. Garland.

With a proper understanding of the law, Mr. Garland might have insisted that Corey tell the truth when asked about changes in the defense theory when asked direct questions by the judge. Alternatively, he might have "attempt[ed] to correct or dispute [Corey's] statement[s]" prior to

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<sup>28</sup> She explained to the court that she came up with the defense theories on her own, without reference to any communication with Mr. Garland. RP (10/8/09) 3714, 3743, 3746-3747.

his testimony, which the prosecution has suggested was his responsibility. *Garland*, 169 Wn. App. at 875 (quoting Response at 11, 16).

Under any of these scenarios, there is a “reasonable probability” that the outcome of the third trial would have differed. *State v. Jones*, No. 85236-7, 2015 WL 3646445, at \*5 (Wash. June 11, 2015). Corey’s deficient performance affected the outcome, prejudicing Mr. Garland. His conviction must be reversed and the case remanded for a new trial.<sup>29</sup> *Id.*

**IV. MR. GARLAND WITHDRAWS HIS ARGUMENTS RELATING TO THE SECRET *IN CAMERA* HEARING.**

Mr. Garland has obtained an order unsealing the transcript of the secret *in camera* hearing that preceded Corey’s withdrawal from the case. After reviewing the transcript, he withdraws his claims regarding that hearing. *See* Supp. Opening Brief, pp. 56-62.

**V. MR. GARLAND RESTS ON HIS PRIOR BRIEFS REGARDING ALL REMAINING ISSUES.**

The Supplemental Response does not address any of the other issues raised in Petitioner’s Supplemental Opening Brief. Respondent’s position is that these issues have been “more than adequately discussed.”

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<sup>29</sup> In the alternative, the Chief Judge should remand the case for a reference hearing, to resolve any additional factual issues necessary to final resolution of the case. RAP 16.11(b).

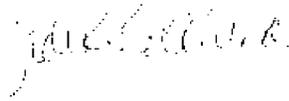
Supplemental Response, p. 2. In light of this, Mr. Garland rests on the argument set forth in his earlier filings.

**CONCLUSION**

For the foregoing reasons, the Chief Judge should transfer the case to the superior court for a reference hearing or a decision on the merits. RAP 16.11(b). The Chief Judge should instruct the lower court to appoint local counsel within two weeks of transfer, to ensure that the case moves forward. In the alternative, the Court of Appeals should reverse Mr. Garland's conviction and remand the case for a new trial.

Respectfully submitted on June 26, 2015,

**BACKLUND AND MISTRY**



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Jodi R. Backlund, WSBA No. 22917  
Attorney for the Petitioner



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Manek R. Mistry, WSBA No. 22922  
Attorney for the Petitioner

CERTIFICATE OF SERVICE

I certify that on today's date:

I mailed a copy of Petitioner's Reply, postage prepaid, to:

Raymond Garland, DOC #834942  
Stafford Creek Corrections Center  
191 Constantine Way  
Aberdeen, WA 98520

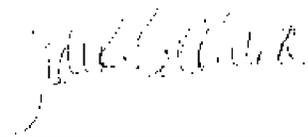
With the permission of the recipient(s), I delivered an electronic version of the reply, using the Court's filing portal, to:

Pierce County Prosecuting Attorney  
pcpatcecf@co.pierce.wa.us  
steve.trinen@co.pierce.wa.us

I filed the Petitioner's Reply electronically with the Court of Appeals, Division II, through the Court's online filing system.

I CERTIFY UNDER PENALTY OF PERJURY UNDER THE LAWS OF THE STATE OF WASHINGTON THAT THE FOREGOING IS TRUE AND CORRECT.

Signed at Olympia, Washington on June 26, 2015.



---

Jodi R. Backlund, WSBA No. 22917  
Attorney for the Petitioner

**APPENDIX**

Supp. Decl. of Raymond Garland (with attachment).....1  
Decl. of Manek R. Mistry (with attachments) .....4  
Decl. of Margaret Cook (with attachments) .....75  
Decl. of Elizabeth Garland.....118

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7 **No. 45165-4-II**  
8 COURT OF APPEALS  
9 DIVISION II  
10 OF THE STATE OF WASHINGTON

11 In re the Personal Restraint of: )  
12 Raymond Garland ) Supplemental  
13 ) Declaration of Raymond Garland  
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Raymond Garland declares as follows:

1. I am the petitioner in this case.
2. As I have said previously, Barbara Corey never told me about the plea offer made by the prosecutor before my third trial. I learned about the plea offer for the first time when I received the state's response to my PRP.
3. If she had told me about the offer, I would have taken it.
4. After sitting through two mistrials, I realized that the state had strong evidence against me. I was less interested in going to trial a third time.
5. I was also concerned about the financial burden on my family. Corey was very expensive, and my mom had to pay her a lot of money to go through two mistrials and then the third trial. I'm attaching a letter from Corey asking for more money for the third trial.
6. I was especially worried that I might be convicted of murder one, which would have been much more time than second-degree murder.
7. It is possible that I told Barbara Corey that I would never plead guilty to murder. If I said this, it would have been early on, before we went through two mistrials. At the time, I didn't understand how much evidence the prosecutor had against me.

*Declaration of Raymond Garland*

**BACKLUND & MISTRY**  
Attorneys at Law

P.O. Box 6490  
Olympia, WA 98507  
(360) 339-4870  
backlundmistry@gmail.com

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8. Also, I didn't want to plead guilty to intentional murder. I didn't intentionally kill anyone, and I didn't want my family to look at me like a murderer. If I had heard there was an offer for felony murder, I would have taken it. This is true even if I originally said I would never plead guilty to murder.

9. I never discussed this plea offer with my mother or other members of my family.

10. Barbara Corey never told me there might be a problem if we changed defenses for the third trial. She never mentioned that I could be impeached with her opening statements from the first two trials.

11. I trusted Corey, and allowed her to make strategy decisions. I didn't know I was supposed to speak up and correct the record when she made her first two opening statements, where she said that I had a gun. I did not have a gun, and I never told her or the investigator that I had a gun of my own.

I DECLARE UNDER PENALTY OF PERJURY UNDER THE LAWS OF THE STATE OF WASHINGTON THAT THE FOREGOING IS TRUE AND CORRECT.

Signed on \_\_\_\_\_ in \_\_\_\_\_, Washington.

[SIGNED COPY TO BE FILED]

\_\_\_\_\_  
Raymond Garland

*Declaration of Raymond Garland*

**BACKLUND & MISTRY**  
Attorneys at Law

\_\_\_\_\_  
P.O. Box 6490  
Olympia, WA 98507  
(360) 339-4870  
backlundmistry@gmail.com

# Barbara Corey

Attorney at Law

---

April 4, 2008

Dear Margaret:

As we have discussed, we need to revisit the retainer in the case. You will recall that I was retained for the first trial and we continued the terms of the retainer into the second trial. I did not ask to renegotiate the retainer although I spent a substantial amount of time preparing for the second trial, given all of the new discovery and issues that evolved.

As of this date, this case has mushroomed into a substantial amount of unforeseen work. I request amendment of the retainer to add \$15,000 for prep time for this final trial (which obviously includes my work on the intended appeal and all other prep).

Although I have raised my trial rate to \$1800/day, I will handle Ray's case at my former rate of \$1500/day.

Please confirm that this is satisfactory to you and I will prepare the new retainer.

As you know, I believe in Ray's case and committed to bringing about a just verdict.

Thanks,

Barbara Corey

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**No. 45165-4-II**  
**COURT OF APPEALS**  
**DIVISION II**  
**OF THE STATE OF WASHINGTON**

In re the Personal Restraint of: )  
Raymond Garland ) Declaration of Manek R. Mistry  
\_\_\_\_\_ )

Manek R. Mistry declares as follows:

1. Our office was appointed to represent Mr. Garland on his Personal Restraint Petition.
2. On February 24, 2015 I sent attorney Barbara Corey a letter requesting a complete, unredacted copy of her file on Mr. Garland’s case. I received a preliminary response dated March 4, and a copy of her file on or about April 2, 2015. I sent a follow up letter on April 14, and received a response April 20<sup>th</sup>, 2015. I have attached copies of this correspondence, including her file, which consists solely of emails dated from 2009 and later.
3. On February 26, 2015 I made a public disclosure request to the Pierce County Sheriff’s Department regarding visiting logs and phone records pertaining to Mr. Garland. I received an initial response dated March 16<sup>th</sup>. I received the results of the request under cover dated April 28<sup>th</sup>. I have attached copies of the request, the initial response, and the results.

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*Declaration of Manek R. Mistry- 1*

**BACKLUND & MISTRY**  
Attorneys at Law  
P.O. Box 6490  
Olympia, WA 98507  
(360) 339-4870  
backlundmistry@gmail.com

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4. On May 12, 2015 I received an email from Barbara Corey’s accountant, Bill Hay. Attached to the email was “an itemized statement of time Barbara Corey spent on the Raymond Garland case with an explanation of each item.” I have attached a copy of the email and the itemized statement.

I DECLARE UNDER PENALTY OF PERJURY UNDER THE LAWS OF THE STATE OF WASHINGTON THAT THE FOREGOING IS TRUE AND CORRECT.

Signed June 25, 2015 in Olympia, Washington.



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Manek R. Mistry, WSBA No. 22922  
Attorney for Defendant/Petitioner

# Backlund & Mistry

## Attorneys at Law

---

Jodi R. Backlund  
Manek R. Mistry

Skylar T. Brett, Staff Attorney  
Valerie Greenup, Legal Assistant  
Quinn Raves, Legal Assistant

February 24, 2015

Barbara Corey, Attorney  
902 S 10th St  
Tacoma, WA 98405-4537

Re: *In re the Personal Restraint of Raymond Garland*  
County Cause No: 04-1-05384-8  
Court of Appeals No: 45165-4-II

Dear Ms. Corey:

As you know, we represent Mr. Garland in connection with his pending Personal Restraint Petition. I've enclosed a copy of the order appointing us.

In accordance with WSBA Advisory Opinion 181, please provide us with a complete unredacted copy of Mr. Garland's entire file. See RPC 1.16 and *In re Disciplinary Proceeding Against Hall*, 180 Wn.2d 821, 329 P.3d 870 (2014), *as corrected* (Sept. 9, 2014), *reconsideration denied* (Sept. 10, 2014). Because Mr. Garland's PRP raises an ineffective assistance claim, withholding any papers will prejudice Mr. Garland's case. See Advisory Opinion 181.

Let us know if any protective orders apply that prohibit dissemination of material.

We are requesting both paper and electronic materials. In addition to the main case file, this request covers any email correspondence you had relating to his case, your fee agreement and all of your billing records, any materials from the investigator or others working on his behalf, any communications you had with his mother, and anything else that relates in any way to his case and your representation of him.

If you anticipate any difficulties complying with this request in a timely fashion, please notify us immediately. Thank you in advance for your cooperation on Mr. Garland's behalf.

Respectfully,

**BACKLUND & MISTRY**



Manek R. Mistry  
Attorney at Law

## Law Offices of Barbara Corey, PLLC

902 South 10<sup>th</sup> Street, Tacoma, WA 98405 PH:253.779.0844 FAX:253.272.6439

---

**Barbara Corey**, Attorney at Law  
barbara@bcoreylaw.com

Kim Redford, Legal Assistant  
kim@bcoreylaw.com

**Warren J. Corey-Boulet**, Attorney at Law  
warren@bcoreylaw.com

March 4, 2015

Backlund and Mistry  
Attorneys at Law  
P.O. Box 6490  
Olympia, WA 98507

RE: *Personal Restraint Petition of Raymond Garland*

Dear Counsel:

As you know, I have received your letter wherein you request my case materials. I have been in a series of trials since the new year (*State v. Ervin Banks*, Pierce County Superior Court Cause No. 13-1-00732-2; *State v. Maurice Flewellen* Pierce County Superior Court Cause No. 12-1-02404-1.) The Flewellen case is on-going, probably for another three weeks.

Having said that, I am well aware that Mr. Garland is entitled to his file and am making diligent efforts to recover what remains of it. As I noted in my declaration to the court, many of our materials were filed with our investigator G. Robert Crow, now deceased, at his office. Mr. Crow and I worked together on interviews and the investigation in this case. For example, we together investigated the scene at Bleacher's bar, canvassed the neighborhood around the bar looking for witnesses who were home at the time of the shooting (and finding one), interviewed witnesses, etc. We kept a large single joint file on each witness and other important investigative case issues (example, specific information regarding firearms involved). Because Bob was a member of the defense team, we had "work product" in these files. Further, as I noted in my declaration which you have, Mr. Crow's office experienced a disaster when a plumbing line broke, filling his office with sewage. A hazmat team was hired to clean the office and the files were destroyed as they had become bio-hazards.

Backlund and Mistry

March 6, 2015

Page 2 of 2

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I have some emails and correspondence. I will make every attempt to get these materials to you no later than Monday, March 23, 2015.

Very truly yours,

  
Barbara Corry

BC:kr

cc: Thomas Roberts, Deputy Prosecuting Attorney, Pierce County Prosecuting Attorney's Office;  
Clerk, Court of Appeals – Division II

Law Offices of Barbara Corey, PLLC

902 South 10<sup>th</sup> Street, Tacoma, WA 98405 PH:253.779.0844 FAX:253.272.6439

Barbara Corey, Attorney at Law  
barbara@bcoreylaw.com

Kim Redford, Legal Assistant  
kr@bcoreylaw.com

Warren J. Corey-Boulet, Attorney at Law  
warren@bcoreylaw.com

April 2, 2015

Backlund and Mistry  
Attorneys at Law  
P.O. Box 6490  
Olympia, WA 98507

RE: *Personal Restraint Petition of Raymond Garland*

Dear Counsel:

Enclosed please find the emails that I was able to recover regarding the above-entitled matter. Unfortunately, I purchased a new computer a couple of years ago and the computer that I used during the Garland case does not function properly.

Very truly yours,



Barbara Corey

BC:kr  
encls.

**Barbara**

**From:** Stephen Penner [spenner@co.pierce.wa.us]  
**Sent:** Tuesday, October 13, 2009 10:33 AM  
**To:** Sheri Schelbert; Maureen Goodman; 'Barbara Corey'  
**Subject:** Garland-Jury Instructions  
**Attachments:** Garland-Jury Instr-FINAL.doc

Hello all.

Attached is the completed, spell-checked, etc., packet of the instructions.

Barbara, if you let me know where you are right now, I'll bring you a hard copy.

Stephen M. Penner  
Pierce County Prosecutor's Office  
tel (253) 798-7314  
fax (253) 798-6636  
spenner@co.pierce.wa.us

\_\_\_\_\_ Information from ESET Smart Security, version of virus signature database 4504  
(20091013) \_\_\_\_\_

The message was checked by ESET Smart Security.

<http://www.eset.com>

**Barbara**

**From:** Sheri Schelbert [sschelb@co.pierce.wa.us]  
**Sent:** Tuesday, October 13, 2009 10:38 AM  
**To:** Stephen Penner; 'Barbara Corey'; Maureen Goodman  
**Subject:** RE: good morning.

4 is going to be too late. Is the morning impossible? If so, I would suggest right after Barbara's plea. I will ask my judge if we can do it in the CDs at that time. Barbara, let me know if that works.

**From:** Stephen Penner  
**Sent:** Tuesday, October 13, 2009 10:33 AM  
**To:** 'Barbara Corey'; Maureen Goodman  
**Cc:** Sheri Schelbert  
**Subject:** RE: good morning.

we should check with the jail. It's probably best to do this in the CDs so Mr. Garland can be present. I don't know if the jail is going to want to do it that late.

Barbara, Could we do it right before or after your 1:30 plea?

**From:** Barbara Corey [mailto:bcorey9@net-venture.com]  
**Sent:** Tuesday, October 13, 2009 10:24 AM  
**To:** Stephen Penner; Maureen Goodman  
**Cc:** Sheri Schelbert  
**Subject:** RE: good morning.

I have a busy day, as I am sure you all do. I suggest 4 p.m.

Barbara Corey  
Attorney at Law. PLLC  
901 South "I" Street, #201  
Tacoma, WA 98405  
253.779.0844  
253.272.9220(fax)

**From:** Stephen Penner [mailto:spenner@co.pierce.wa.us]  
**Sent:** Tuesday, October 13, 2009 9:41 AM  
**To:** Sheri Schelbert; 'barbara@bcoreylaw.com'; Maureen Goodman  
**Cc:** 'Barbara Corey'  
**Subject:** RE: good morning.

Will do. But I thought the judge was going to tell us when and where to appear for exceptions.

On a related note, I should have the packet completed by 10:15.

**From:** Sheri Schelbert  
**Sent:** Tuesday, October 13, 2009 9:40 AM  
**To:** 'barbara@bcoreylaw.com'; Stephen Penner; Maureen Goodman  
**Subject:** good morning.

Geri is out of office today, so please e-mail me any correspondence regarding the Garland case

Appendix - 11

1/10/2001

and when you plan to come in for jury instructions and/or exceptions.  
thanks,  
Sheri

\_\_\_\_\_ Information from ESET Smart Security, version of virus signature database 4503  
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The message was checked by ESET Smart Security.

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\_\_\_\_\_ Information from ESET Smart Security, version of virus signature database 4504  
(20091013) \_\_\_\_\_

The message was checked by ESET Smart Security.

<http://www.eset.com>

**Barbara**

**From:** Stephen Penner [spenner@co.pierce.wa.us]

**Sent:** Tuesday, October 13, 2009 10:33 AM

**To:** 'Barbara Corey'; Maureen Goodman

**Cc:** Sheri Schelbert

**Subject:** RE: good morning.

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Barbara, Could we do it right before or after your 1:30 plea?

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**Sent:** Tuesday, October 13, 2009 10:24 AM

**To:** Stephen Penner; Maureen Goodman

**Cc:** Sheri Schelbert

**Subject:** RE: good morning.

I have a busy day, as I am sure you all do. I suggest 4 p.m.

Barbara Corey  
Attorney at Law. PLLC  
901 South "I" Street, #201  
Tacoma, WA 98405  
253.779.0844  
253.272.9220(fax)

**From:** Stephen Penner [mailto:spenner@co.pierce.wa.us]

**Sent:** Tuesday, October 13, 2009 9:41 AM

**To:** Sheri Schelbert; 'barbara@bcoreylaw.com'; Maureen Goodman

**Cc:** 'Barbara Corey'

**Subject:** RE: good morning.

Will do. But I thought the judge was going to tell us when and where to appear for exceptions.

On a related note, I should have the packet completed by 10:15.

**From:** Sheri Schelbert

**Sent:** Tuesday, October 13, 2009 9:40 AM

**To:** 'barbara@bcoreylaw.com'; Stephen Penner; Maureen Goodman

**Subject:** good morning.

Geri is out of office today, so please e-mail me any correspondence regarding the Garland case and when you plan to come in for jury instructions and/or exceptions.

thanks,  
Sheri

Information from ESET Smart Security, version of virus signature database 4503  
(20091013)

253.779.0844  
253.272.9220(fax)

**From:** Sheri Schelbert [mailto:sschelb@co.pierce.wa.us]  
**Sent:** Tuesday, October 13, 2009 11:16 AM  
**To:** Stephen Penner; Maureen Goodman; 'Barbara Corey'  
**Subject:** RE: Garland-Jury Instructions

Cancel 11:30.  
Please be in Rm. 833 at 1:30 or as close thereto as possible.  
Barbara, please let me know you've received this message and that this works for you.  
Thanks,  
Sheri

**From:** Stephen Penner  
**Sent:** Tuesday, October 13, 2009 10:33 AM  
**To:** Sheri Schelbert; Maureen Goodman; 'Barbara Corey'  
**Subject:** Garland-Jury Instructions

Hello all.

Attached is the completed, spell-checked, etc., packet of the instructions.

Barbara, if you let me know where you are right now, I'll bring you a hard copy.

Stephen M. Penner  
Pierce County Prosecutor's Office  
tel (253) 798-7314  
fax (253) 798-6636  
spenner@co.pierce.wa.us

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\_\_\_\_\_ Information from ESET Smart Security, version of virus signature database 4504  
(20091013) \_\_\_\_\_

The message was checked by ESET Smart Security.

<http://www.eset.com>

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**Barbara**

**From:** Sheri Schelbert [sschelb@co.pierce.wa.us]  
**Sent:** Tuesday, October 13, 2009 11:42 AM  
**To:** 'Barbara Corey'; Stephen Penner; Maureen Goodman  
**Subject:** RE: Garland-Jury Instructions

Okay, let's hope this is the FINAL word. Sorry for all the changes, but the jail cannot have him here at 1:30. New plan is for 3:00 sharp, Rm. 833.  
Barbara, hopefully that works better for you.  
See you all then!

**From:** Barbara Corey [mailto:bcorey9@net-venture.com]  
**Sent:** Tuesday, October 13, 2009 11:19 AM  
**To:** Sheri Schelbert; Stephen Penner; Maureen Goodman  
**Subject:** RE: Garland-Jury Instructions

I've received the message and I will begrudgingly make it work. Thanks B

Barbara Corey  
Attorney at Law. PLLC  
901 South "I" Street, #201  
Tacoma, WA 98405  
253.779.0844  
253.272.9220(fax)

**From:** Sheri Schelbert [mailto:sschelb@co.pierce.wa.us]  
**Sent:** Tuesday, October 13, 2009 11:16 AM  
**To:** Stephen Penner; Maureen Goodman; 'Barbara Corey'  
**Subject:** RE: Garland-Jury Instructions

Cancel 11:30.  
Please be in Rm. 833 at 1:30 or as close thereto as possible.  
Barbara, please let me know you've received this message and that this works for you.  
Thanks,  
Sheri

**From:** Stephen Penner  
**Sent:** Tuesday, October 13, 2009 10:33 AM  
**To:** Sheri Schelbert; Maureen Goodman; 'Barbara Corey'  
**Subject:** Garland-Jury Instructions

Hello all.

Attached is the completed, spell-checked, etc., packet of the instructions.

Barbara, if you let me know where you are right now, I'll bring you a hard copy.

Stephen M. Penner  
Pierce County Prosecutor's Office  
tel (253) 798-7314  
fax (253) 798-6636

(20091013) \_ \_ \_ \_ \_

The message was checked by ESET Smart Security.

<http://www.eset.com>

**Barbara**

**From:** Sheri Schelbert [sschelb@co.pierce.wa.us]  
**Sent:** Tuesday, October 13, 2009 12:18 PM  
**To:** Stephen Penner; 'Barbara Corey'; Maureen Goodman  
**Subject:** RE: Garland-Jury Instructions

Making numbered copies for everybody right now.  
They will be available for you in PJ at 1:30.

**From:** Stephen Penner  
**Sent:** Tuesday, October 13, 2009 11:50 AM  
**To:** 'Barbara Corey'; Sheri Schelbert; Maureen Goodman  
**Subject:** RE: Garland-Jury Instructions

So now what?

**From:** Barbara Corey [mailto:bcorey9@net-venture.com]  
**Sent:** Tuesday, October 13, 2009 11:48 AM  
**To:** Sheri Schelbert; Stephen Penner; Maureen Goodman  
**Subject:** RE: Garland-Jury Instructions

I can't do it at 3. I have talked to Sheri.

Barbara Corey  
Attorney at Law. PLLC  
901 South "I" Street, #201  
Tacoma, WA 98405  
253.779.0844  
253.272.9220(fax)

**From:** Sheri Schelbert [mailto:sschelb@co.pierce.wa.us]  
**Sent:** Tuesday, October 13, 2009 11:42 AM  
**To:** 'Barbara Corey'; Stephen Penner; Maureen Goodman  
**Subject:** RE: Garland-Jury Instructions

Okay let's hope this is the FINAL word. Sorry for all the changes, but the jail cannot have him here at 1:30. New plan is for 3:00 sharp, Rm. 833.  
Barbara, hopefully that works better for you.  
See you all there!

**From:** Barbara Corey [mailto:bcorey9@net-venture.com]  
**Sent:** Tuesday, October 13, 2009 11:19 AM  
**To:** Sheri Schelbert; Stephen Penner; Maureen Goodman  
**Subject:** RE: Garland-Jury Instructions

I've received the message and I will begrudgingly make it work. Thanks B

Barbara Corey  
Attorney at Law. PLLC  
901 South "I" Street, #201  
Tacoma, WA 98405

**Barbara**

**From:** Geri Markham [gmarkha@co.pierce.wa.us]  
**Sent:** Thursday, October 15, 2009 11:35 AM  
**To:** 'Barbara Corey'; Stephen Penner; 'Kim Redford'  
**Cc:** Maureen Goodman  
**Subject:** RE: Garland - today

Thank you ALL - confirmed 3:00 pm, Tuesday, October 20th in CDPJ. Thank you so much  
Geri

**From:** Barbara Corey [mailto:bcorey9@net-venture.com]  
**Sent:** Thursday, October 15, 2009 11:27 AM  
**To:** Stephen Penner; 'Kim Redford'; Geri Markham  
**Cc:** Maureen Goodman  
**Subject:** RE: Garland - today

Let's say 3 so that the court can handle most of the docket first.

Barbara Corey  
Attorney at Law. PLLC  
901 South "I" Street, #201  
Tacoma, WA 98405  
253.779.0844  
253.272.9220(fax)

**From:** Stephen Penner [mailto:spenner@co.pierce.wa.us]  
**Sent:** Thursday, October 15, 2009 11:24 AM  
**To:** 'Barbara Corey'; 'Kim Redford'; Geri Markham  
**Cc:** Maureen Goodman  
**Subject:** RE: Garland - today

Let's do Tuesday at 1:30, CDPJ. Is everyone good with that?  
-Steve

**From:** Barbara Corey [mailto:bcorey9@net-venture.com]  
**Sent:** Thursday, October 15, 2009 11:14 AM  
**To:** 'Kim Redford'; Stephen Penner; Geri Markham  
**Cc:** Maureen Goodman  
**Subject:** RE: Garland - today

I like Tuesday or Wednesday. Thanks, BC

Barbara Corey  
Attorney at Law. PLLC  
901 South "I" Street, #201  
Tacoma, WA 98405  
253.779.0844  
253.272.9220(fax)

**From:** Kim Redford [mailto:kim@bcoreylaw.com]  
**Sent:** Thursday, October 15, 2009 10:56 AM  
**To:** 'Stephen Penner'; 'Geri Markham'; 'Barbara Corey'  
**Cc:** 'Maureen Goodman'  
**Subject:** RE: Garland - today

Hi Steve – Monday or Tuesday would work best for Barbara. Thursday is definitely out – she has an oral argument at the COA that afternoon.

*Kim Redford*  
Legal Assistant

[kim@bcoreylaw.com](mailto:kim@bcoreylaw.com)  
[www.bcoreylaw.com](http://www.bcoreylaw.com)

Barbara Corey  
Attorney at Law  
901 South "I" Street, Ste. 201  
Tacoma, WA 98405  
phone: 253-779-0844 fax: 253-272-9220

BARBARA COREY, Attorney at Law, PLLC CONFIDENTIAL COMMUNICATION/ATTORNEY-CLIENT PRIVILEGED. This e-mail is sent by a law firm and may contain information that is PRIVILEGED or CONFIDENTIAL. If you are not the intended recipient, please delete the e-mail and any attachments and notify us immediately. Thank you.

**From:** Stephen Penner [mailto:spenner@co.pierce.wa.us]  
**Sent:** Thursday, October 15, 2009 10:22 AM  
**To:** 'Kim Redford'; Geri Markham; 'Barbara Corey'  
**Cc:** Maureen Goodman  
**Subject:** RE: Garland - today

Barbara & Kim,

Geri informed me that we can schedule the closing argument for count IV any day next week except Monday. It will be at 1:30 pm in C111. The judge plans to limit arguments 10 minutes a side.

Maureen and I are available any day next week. What day would you like to schedule it?

--Steve

**From:** Kim Redford [mailto:kim@bcoreylaw.com]  
**Sent:** Thursday, October 15, 2009 9:38 AM  
**To:** Geri Markham  
**Cc:** Stephen Penner; Maureen Goodman  
**Subject:** Garland - today  
**Importance:** High

Hi Geri,

Barbara sent you an e-mail earlier this morning & I left you a voice mail as well. Steve does not object to moving the argument today over to Monday. Is this

acceptable with the judge?

Kim Redford  
Legal Assistant

[kim@bcoreylaw.com](mailto:kim@bcoreylaw.com)  
[www.bcoreylaw.com](http://www.bcoreylaw.com)

Barbara Corey  
Attorney at Law  
901 South "I" Street, Ste. 201  
Tacoma, WA 98405  
phone: 253-779-0844 fax: 253-272-9220

BARBARA COREY, Attorney at Law, PLLC CONFIDENTIAL COMMUNICATION/ATTORNEY-CLIENT PRIVILEGED. This e-mail is sent by a law firm and may contain information that is PRIVILEGED or CONFIDENTIAL. If you are not the intended recipient, please delete the e-mail and any attachments and notify us immediately. Thank you.

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Information from ESET Smart Security, version of virus signature database 4511  
(20091015)

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**Barbara**

**From:** Geri Markham [gmarkha@co.pierce.wa.us]

**Sent:** Thursday, October 29, 2009 12:18 PM

**To:** Stephen Penner; 'Barbara Corey'

**Cc:** Maureen Goodman

**Subject:** RE: Garland - Argument on Count IV

November 6th in the PM is good with us. I'm sure Judge F would any materials ASAP.

We will be in CDPJ and hopefully they send out any long hearings to other courtrooms.

Let me know for sure that this is okay with everyone. Thank you. Geri

**From:** Stephen Penner

**Sent:** Thursday, October 29, 2009 9:04 AM

**To:** 'Barbara Corey'; Geri Markham

**Cc:** Maureen Goodman

**Subject:** Garland - Argument on Count IV

Barbara & Geri,

I propose we schedule the argument on Count IV on Mr Garland's case for next Friday, November 6. The State is available any time that day. At that time we could also discuss the schedule for Mr. Garland's motion to dismiss.

Barbara, is you want to do it sooner, we're available any day next week except Monday.

Stephen M. Penner

Pierce County Prosecutor's Office

tel (253) 798-7314

fax (253) 798-6636

spenner@co.pierce.wa.us

Information from ESET Smart Security, version of virus signature database 4556  
(20091029)

The message was checked by ESET Smart Security.

<http://www.eset.com>

**Barbara**

**From:** Barnowe-Meyer, Brooke [Brooke.Barnowe-Meyer@courts.wa.gov]  
**Sent:** Friday, July 31, 2009 4:25 PM  
**To:** bcorey9@net-venture.com; spenner@co.pierce.wa.us  
**Subject:** Supreme Court No. 83438-5 - State of Washington v. Raymond Wesley Garland  
**Attachments:** 83438-5 Deputy Clerk's Letter.pdf

Counsel:

Please see the attached letter from the Deputy Clerk regarding Supreme Court No. 83438-5, State of Washington v. Raymond Wesley Garland.

Thank you,  
*Brooke W. Barnowe-Meyer*  
Washington Supreme Court  
Office of the Clerk  
Legal Secretary  
Brooke.Barnowe-Meyer@courts.wa.gov  
(360) 357-2079

\_\_\_\_\_ Information from ESET Smart Security, version of virus signature database 4299  
(20090802) \_\_\_\_\_

The message was checked by ESET Smart Security.

<http://www.eset.com>

**Barbara**

**From:** PJBemail@aol.com  
**Sent:** Sunday, August 02, 2009 10:55 PM  
**To:** barbara@bcoreylaw.com  
**Cc:** kim@bcoreylaw.com; grcrow@msn.com  
**Subject:** Patrick A. LaChapelle, 7/31/09, Interview, State v. Garland  
**Attachments:** LaChapelle,Filing,7-31-09.pdf; lachapelle,patrick,7-31-09.ptx

Hi, Barb, Bob, and Kim....attached is the e-transript and Notice of Filing for the interview of Patrick A. LaChapelle, taken last Friday in State v. Garland. I'll send the dep of Shelley Dominick in a separate e-mail. Great seeing you guys! Pam

***Pamela J. Bentley, CCR***

***Direct Line: (360) 871-8083 or (253) 297-6793***

*James, Sanderson & Lowers*

*Court Reporting, Record Retrieval, Transcription*

*307 - 29th Street Northeast, Suite 101*

*Puyallup, Washington 98372-6718*

*Phone: (253) 445-3400 (800) 507-8273 Fax: (253) 445-4425*

*email: info@jsandl.com*

Information from ESET Smart Security, version of virus signature database 4301  
(20090803)

The message was checked by ESET Smart Security.

<http://www.eset.com>

**Barbara**

**From:** PJBemail@aol.com  
**Sent:** Sunday, August 02, 2009 10:56 PM  
**To:** barbara@bcoreylaw.com  
**Cc:** kim@bcoreylaw.com; grcrow@msn.com; pat@jsandl.com  
**Subject:** Shelley D. Dominick, 7/31/09, Deposition, State v. Garland  
**Attachments:** Dominick,Readiness,7-31-09.pdf; dominick,shelley,7-31-09.ptx

Okay, Barbara....here you go.....attached is the e-transcript and Notice of Readiness for the deposition of Shelley D. Dominick, taken last Friday in State v. Garland. Hope to see you again soon! Pam P.S. I cc'd Bob and Kim already on both of these.

***Pamela J. Bentley, CCR***

***Direct Line: (360) 871-8083 or (253) 297-6793***

*James, Sanderson & Lowers*

*Court Reporting, Record Retrieval, Transcription*

*307 - 29th Street Northeast, Suite 101*

*Puyallup, Washington 98372-6718*

*Phone: (253) 445-3400 (800) 507-8273 Fax: (253) 445-4425*

*email: info@jsandl.com*

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(20090803)

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**Barbara**

**From:** PJBemail@aol.com  
**Sent:** Monday, August 03, 2009 1:57 PM  
**To:** barbara@bcoreylaw.com  
**Cc:** kim@bcoreylaw.com; grcrow@msn.com  
**Subject:** Shelley D. Dominick, State v. Garland, Filing Notice  
**Attachments:** Dominick,Filing,7-31-09.pdf

Here's the Notice of Filing for the dep of Shelley Dominick. I'll get the original right off to you, Barb! Thanks again! Pam P.S. If a correction sheet does come in, I'll seal that separately with a title page and mail it off to you.

***Pamela J. Bentley, CCR***

***Direct Line: (360) 871-8083 or (253) 297-6793***

*James, Sanderson & Lowers*

*Court Reporting, Record Retrieval, Transcription*

*307 - 29th Street Northeast, Suite 101*

*Puyallup, Washington 98372-6718*

*Phone: (253) 445-3400 (800) 507-8273 Fax: (253) 445-4425*

*email: info@jsandl.com*

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(20090803)

The message was checked by ESET Smart Security.

<http://www.eset.com>

**Barbara**

**From:** margaret [cook.margaret@comcast.com]

**Sent:** Wednesday, August 05, 2009 7:46 PM

**To:** Barbara Corey

**Subject:** Question on jury pick

I am going over my notes from today. I was wondering how many Jurors you get to get rid of and how many Penner gets ride of. Do you each start with the lowest# and start dinging until you can't ding anymore and then the remaining jury starts with the lowest# until you reach 12 jurors and 2 alternates. can you let me know ASAP so I can send you another e-mail on what I think would be good. thank you, Margaret

\_\_\_\_\_ Information from ESET Smart Security, version of virus signature database 4310  
(20090805) \_\_\_\_\_

The message was checked by ESET Smart Security.

<http://www.eset.com>

**Barbara**

**From:** OFFICE RECEPTIONIST, CLERK [SUPREME@COURTS.WA.GOV]  
**Sent:** Wednesday, August 12, 2009 8:06 AM  
**To:** Barbara Corey; Carlson, Susan; kprocto@co.pierce.wa.us; spenner@co.pierce.wa.us; supreme.court@wa.gov  
**Subject:** RE: Supreme Court No. 83438-5 - State v. Garland  
Rec. 8-12-09

**From:** Barbara Corey [mailto:bcorey9@net-venture.com]  
**Sent:** Wednesday, August 12, 2009 8:03 AM  
**To:** Carlson, Susan; kprocto@co.pierce.wa.us; spenner@co.pierce.wa.us; supreme.court@wa.gov  
**Cc:** OFFICE RECEPTIONIST, CLERK  
**Subject:** RE: Supreme Court No. 83438-5 - State v. Garland  
**Importance:** High

Petitioner Garland requests oral argument. Thank you, BC

Barbara Corey  
Attorney at Law. PLLC  
901 South "I" Street, #201  
Tacoma, WA 98405  
253.779.0844  
253.272.9220(fax)

**From:** Carlson, Susan [mailto:Susan.Carlson@courts.wa.gov]  
**Sent:** Tuesday, August 11, 2009 4:57 PM  
**To:** kprocto@co.pierce.wa.us; bcorey9@net-venture.com; spenner@co.pierce.wa.us  
**Cc:** OFFICE RECEPTIONIST, CLERK  
**Subject:** Supreme Court No. 83438-5 - State v. Garland

Counsel: The [motion for emergency stay](#) will be considered by the Supreme Court Commissioner on his August 13, 2009, Motion Calendar. The motion will be considered without oral argument unless a written request for oral argument is received by not later than 3 p.m. on August 12, 2009.

The setting of the motion for discretionary review and due dates for an answer and any reply to that motion will be provided by separate letter.

All counsel are requested to respond to this email to confirm receipt only. Any other emails regarding this case must be sent to the Clerk's office email address at: [supreme@courts.wa.gov](mailto:supreme@courts.wa.gov)

Susan L. Carlson  
Supreme Court Deputy Clerk

## Barbara

---

**From:** margaret [cook.margaret@comcast.com]  
**Sent:** Friday, August 07, 2009 11:04 AM  
**To:** Barbara Corey  
**Subject:** Re: witnesses for Monday

Lets have Bob there all day on Monday since we dont know the order. have a great day,  
Margaret

----- Original Message -----

**From:** "Barbara Corey" <bcorey9@net-venture.com>  
**To:** <cook.margaret@comcast.net>  
**Sent:** Friday, August 07, 2009 10:52 AM  
**Subject:** FW: witnesses for Monday

>  
>  
> Barbara Corey  
> Attorney at Law. PLLC  
> 901 South "I" Street, #201  
> Tacoma, WA 98405  
> 253.779.0844  
> 253.272.9220(fax)

>  
> -----Original Message-----

> **From:** Barbara Corey [mailto:bcorey9@net-venture.com]  
> **Sent:** Friday, August 07, 2009 10:50 AM  
> **To:** 'brian & margaret cook'; 'cook.margaret@comcast.com'  
> **Subject:** FW: witnesses for Monday  
> **Importance:** High

> Margaret: It is difficult to know the order (sending 10 names for a  
> 1/2 day's testimony is chicken shit). I would like to have Bob  
> present during several of these witnesses. How shall we work it?

> Thanks, BC

>  
> Barbara Corey  
> Attorney at Law. PLLC  
> 901 South "I" Street, #201  
> Tacoma, WA 98405  
> 253.779.0844  
> 253.272.9220(fax)

>  
> -----Original Message-----

> **From:** Stephen Penner [mailto:spenner@co.pierce.wa.us]  
> **Sent:** Friday, August 07, 2009 10:28 AM  
> **To:** 'Barbara Corey'; Maureen Goodman  
> **Cc:** Michelle Walker; Michelle Prichard; Wayne Smith  
> **Subject:** RE: witnesses for Monday

> Barbara,

> Here are our first ten witnesses. I don't how far we'll get on Monday...

- >  
> 1. PCSD Doug Maier  
> 2. PCSD Kristi Estes  
> 3. Denise Severson  
> 4. Thomas Wheeler  
> 5. Chris Lorenz, CPFR  
> 6. Dr. Howard

- > 7. PCSD Michael Portmann
- > 8. PCSD Steve Wilkins
- > 9. PCSD Darin Rayner
- > 10. PCSD Mark Fry
- >
- > See you Monday
- > -Steve
- >
- >
- >

Information from ESET Smart Security, version of virus signature database 4315  
(20090807) \_ \_ \_ \_ \_

The message was checked by ESET Smart Security.

<http://www.eset.com>

## Barbara

---

**From:** Stephen Penner [spenner@co.pierce.wa.us]  
**Sent:** Friday, August 07, 2009 1:39 PM  
**To:** 'Barbara Corey'  
**Cc:** Maureen Goodman  
**Subject:** RE: witnesses for Monday

Authentication of the 911 call Wheeler made. Unless you'll stip to authenticity?

-----Original Message-----

**From:** Barbara Corey [mailto:bcorey9@net-venture.com]  
**Sent:** Friday, August 07, 2009 11:53 AM  
**To:** Stephen Penner  
**Subject:** RE: witnesses for Monday

What will Denise Severson testify about?

Barbara Corey  
Attorney at Law. PLLC  
901 South "I" Street, #201  
Tacoma, WA 98405  
253.779.0844  
253.272.9220 (fax)

-----Original Message-----

**From:** Stephen Penner [mailto:spenner@co.pierce.wa.us]  
**Sent:** Friday, August 07, 2009 10:28 AM  
**To:** 'Barbara Corey'; Maureen Goodman  
**Cc:** Michelle Walker; Michelle Prichard; Wayne Smith  
**Subject:** RE: witnesses for Monday

Barbara,

Here are our first ten witnesses. I don't know how far we'll get on Monday...

1. PCSD Doug Maier
2. PCSD Kristi Estes
3. Denise Severson
4. Thomas Wheeler
5. Chris Lorenz, CPFR
6. Dr. Howard
7. PCSD Michael Portmann
8. PCSD Steve Wilkins
9. PCSD Darin Rayner
10. PCSD Mark Fry

See you Monday  
-Steve

-----Original Message-----

**From:** Barbara Corey [mailto:bcorey9@net-venture.com]  
**Sent:** Friday, August 07, 2009 10:24 AM  
**To:** Stephen Penner; Maureen Goodman  
**Subject:** witnesses for Monday  
**Importance:** High

I know it is not noon yet. Kim Redford, my legal assistant, is leaving at 1 p.m. Could you please tell me which witnesses you are calling so that she help with preparation before she leaves?

I am going to be late getting out of here because I have a restitution hearing this afternoon. Damn it.

Anyway, thanks for your help and hope you enjoy whatever weekend down time you have!  
BC

Barbara Corey  
Attorney at Law. PLLC  
901 South "I" Street, #201  
Tacoma, WA 98405  
253.779.0844  
253.272.9220 (fax)

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(20090807) \_\_\_\_\_

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**Barbara**

**From:** Barnowe-Meyer, Brooke [Brooke.Barnowe-Meyer@courts.wa.gov]  
**Sent:** Friday, August 14, 2009 10:15 AM  
**To:** bcorey9@net-venture.com; spenner@co.pierce.wa.us; kprocto@co.pierce.wa.us  
**Subject:** Supreme Court No. 83438-5 - State of Washington v. Raymond Wesley Garland  
**Attachments:** 83438-5 Letter.pdf; 83438-5 Ruling Denying Stay.pdf

Counsel:

On August 14, 2009, Supreme Court Commissioner Steven Goff issued a RULING DENYING STAY in Supreme Court case no. 83438-5, *State of Washington v. Raymond Wesley Garland*. A copy of the ruling is attached for your review.

Thank you,  
*Brooke W. Barnowe-Meyer*  
Washington Supreme Court  
Office of the Clerk  
Legal Secretary  
[Brooke.Barnowe-Meyer@courts.wa.gov](mailto:Brooke.Barnowe-Meyer@courts.wa.gov)  
(360) 357-2079

Information from ESET Smart Security, version of virus signature database 4335  
(20090814).

The message was checked by ESET Smart Security.

<http://www.eset.com>

## Barbara

---

**From:** margaret [cook.margaret@comcast.com]  
**Sent:** Sunday, August 09, 2009 10:46 AM  
**To:** Barbara Corey  
**Subject:** Re: OPENING STATEMENT

I think that is a smart idea, We should wait and see what their witnesses have to say. have a great day. Margaret

----- Original Message -----

From: "Barbara Corey" <bcorey9@net-venture.com>  
To: <COOK.MARGARET@COMCAST.NET>; <grcrow@msn.com>  
Sent: Sunday, August 09, 2009 10:01 AM  
Subject: OPENING STATEMENT

> Ray and I had talked briefly about reserving opening statement until  
> the end of the state's case. The pros are that the state might try to  
> put on its case without Debbie Heishman and we don't know if Michael  
> Behe and Teresa Schodron will testify consistent with their  
> statements.

> Thus, we can hit it up in our opening.

> The cons are that the jury will hear the state's opening tomorrow and  
> not our's. On the other hand, we can cross-examine their witnesses  
> and take the sting out of that and then hit them with our case later.

> Bob ---- It is my oldest son's 30th birthday and we have relatives  
> from out of state for a BBQ (they flew in yesterday). Bob --- COULDR  
> YOU PLEASE GET TO THE JAIL AND TELL RAY THAT I AM PLANNING TO RESERVE  
> OUR OPENING. IT IS MY DECISION, OF COURSE, BUT I WOULD LIE, FEEDBACK  
> FROM EVERYONE.

> Thanks, BC

> 4401 Merry Lane West  
> University Place, WA 98466  
> 253.565.0727  
> 253.224.7744

4ke

Information from ESET Smart Security, version of virus signature database 4316  
(20090807)

The message was checked by ESET Smart Security.

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**Barbara**

**From:** Stephen Penner [spenner@co.pierce.wa.us]  
**Sent:** Tuesday, September 01, 2009 9:45 AM  
**To:** Craig Adams; 'Bob Crow'  
**Cc:** 'Barbara Corey'; Maureen Goodman  
**Subject:** RE: Interview of 2 deputies

Craig,  
So you know, I have no objection to these interviews and would encourage the deputies to do the interviews. I and/or Maureen will make ourselves available if the deputies would like.  
Thanks.  
-Penner

**From:** Craig Adams  
**Sent:** Tuesday, September 01, 2009 8:16 AM  
**To:** 'Bob Crow'  
**Cc:** Stephen Penner  
**Subject:** RE: Interview of 2 deputies

Thanks, as you know, it is up to each Deputy as to whether or not they want to be interviewed. I will email each Deputy and see what is their desire in this regard and then let you know.  
Thanks.

**From:** Bob Crow [mailto:grcrow@msn.com]  
**Sent:** Monday, August 31, 2009 21:12  
**To:** Craig Adams  
**Cc:** Stephen Penner  
**Subject:** Interview of 2 deputies

I am working with Barbara Corey as the defense investigator on the State vs. Raymond Garland case. We are currently in trial. An issue has come up over the arrest and release of Witness Karltn Marcy on 8/28/09. He is needed to testify at the trial, but he is uncooperative.

I am requesting a short interview with the two deputies involved in the arrest. They are Fred Johnson # 84-024 and Carmela Buchanan # 94-019. I would request that the deputies bring copies of their notes to the interview. I would anticipate the interviews to be very short-not over 15-20 minutes each maximum.

We are not investigating or accusing the sheriff's department of any wrongdoing in this matter. It is obvious that the officers made a valid arrest and booked Mr. Marcy into jail on warrants. We are just trying to get all the details of how Mr. Marcy was handled by the system.

Barbara will probably not be available for the interviews and I will handle them myself. I have no objection to you, Mr. Penner, or Ms. Goodman being present for the interview. I am just trying to gather all of the details.

Thanks,

Bob Crow

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The message was checked by ESET Smart Security.

<http://www.eset.com>

## Barbara

---

**From:** Barbara Corey [bcorey9@net-venture.com]  
**Sent:** Sunday, August 30, 2009 5:13 PM  
**To:** barbara@bcoreylaw.com; 'Barbara Corey'  
**Subject:** Garland brief

**Importance:** High

**Attachments:** suppressionmotion-august2009.doc



suppressionmotion-  
august2009.d...

Barbara Corey  
Attorney at Law. PLLC  
901 South "I" Street, #201  
Tacoma, WA 98405  
253.779.0844  
253.272.9220 (fax)

Information from ESET Smart Security, version of virus signature database 4382  
(20090830)

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## Barbara

---

**From:** Barbara Corey [bcorey9@net-venture.com]  
**Sent:** Sunday, August 30, 2009 5:13 PM  
**To:** barbara@bcoreylaw.com; 'Barbara Corey'  
**Subject:** Garland brief

**Importance:** High

**Attachments:** suppressionmotion-august2009.doc



suppressionmotion-  
august2009.d...

Barbara Corey  
Attorney at Law. PLLC  
901 South "I" Street, #201  
Tacoma, WA 98405  
253.779.0844  
253.272.9220 (fax)

Information from ESET Smart Security, version of virus signature database 4382  
(20090830)

The message was checked by ESET Smart Security.

<http://www.eset.com>

**Barbara**

**From:** Cindy Stewart [cindykstewart@hotmail.com]  
**Sent:** Wednesday, September 02, 2009 10:05 AM  
**To:** Barbara Corey; Kim Redford  
**Subject:** Carlton Marcy KCSC Arraignment Transcript  
**Attachments:** MARCI Arraignment KCSC Transcript.BC.pdf

I have attached a .pdf of the transcript of the arraignment hearing on Carlton Marcy in King County Superior Court.

Cindy Stewart  
Stewart Legal Services  
Phone: (253) 297-8791

**STEWART LEGAL SERVICES**  
**STEWARTLEGALSERVICES.COM**  
**PHONE: (253) 297-8791**

This e-mail message is intended only for the named recipient(s) above and is covered by the Electronic Communications Privacy Act, 18 U.S.C. Sections 2510-2521. This e-mail is confidential and may contain information that is privileged, attorney work product or exempt from disclosure under applicable law. Recipients should not file copies of this e-mail with publicly accessible records. If you have received this message in error, please immediately notify the sender by return e-mail and delete this e-mail and any attachments from your computer. Thank you.

Information from ESET Smart Security, version of virus signature database 4389  
(20090902)

The message was checked by ESET Smart Security.

<http://www.eset.com>

## Barbara

**From:** margaret [cook.margaret@comcast.com]

**Sent:** Tuesday, September 15, 2009 8:27 PM

**To:** Barbara Corey

**Subject:** flight for mcmurrian

Hi Barbara,

I have a flight confirmed for JJMcMurrian for 09/22/09 arrive seattle at 6:55pm and leave seattle on 09/24/09 at 2:37pm so he will have to be in airport by 1:15pm on 24th. not sure if you need more time but if you could let me know if this ok i will book it. i hope you get this tonight so I can still get this price as it cheap and may go up tomorrow. thank you and have a great night. (it is flight and hotel)

Information from ESET Smart Security, version of virus signature database 4427  
(20090915)

The message was checked by ESET Smart Security.

<http://www.eset.com>

**Barbara**

**From:** Stephen Penner [spenner@co.pierce.wa.us]

**Sent:** Thursday, September 17, 2009 12:01 PM

**To:** 'Barbara Corey'

**Subject:** RE: Photographs of Mariann deTracy

I didn't see the diagrams today. Were they the typical naked body with x's?

**From:** Barbara Corey [mailto:bcorey9@net-venture.com]

**Sent:** Thursday, September 17, 2009 11:55 AM

**To:** Stephen Penner; kim@bcoreylaw.com

**Cc:** 'Gerald Crow'; Geri Markham; Maureen Goodman; Michelle Prichard

**Subject:** RE: Photographs of Mariann deTracy

What about the diagrams made in the autopsy that she saw in the file today?

Barbara Corey  
Attorney at Law. PLLC  
901 South "I" Street, #201  
Tacoma, WA 98405  
253.779.0844  
253.272.9220(fax)

**From:** Stephen Penner [mailto:spenner@co.pierce.wa.us]

**Sent:** Thursday, September 17, 2009 11:45 AM

**To:** 'Barbara Corey'; 'kim@bcoreylaw.com'

**Cc:** 'Gerald Crow'; Geri Markham; Maureen Goodman; Michelle Prichard

**Subject:** Photographs of Mariann deTracy

Ms. Corey:

Upon review of the discovery, it appears that Ms. deTracy's photographs were previously provided to you as discovery pages 672-675.

Please contact me with any further questions or concerns. Thanks.

Stephen M. Penner  
Pierce County Prosecutor's Office  
tel (253) 798-7314  
fax (253) 798-6636  
spenner@co.pierce.wa.us

Information from ESET Smart Security, version of virus signature database 4434  
(20090917)

The message was checked by ESET Smart Security.

<http://www.eset.com>

Information from ESET Smart Security, version of virus signature database 4434  
(20090917)

The message was checked by ESET Smart Security.

<http://www.eset.com>

**Barbara**

**From:** Gerald Crow [grcrow@msn.com]  
**Sent:** Monday, September 28, 2009 9:33 AM  
**To:** Barbara Corey  
**Subject:** RE: Raiford

I can't find my notes, but here's what I know about Robert Raiford:

He's at St. Joseph's hospital where he's been for several weeks. He suffered kidney failure and he has to be kept in the hospital. His doctors told him he won't be able to leave the hospital at all until the end of October at the earliest.

bob

> From: bcorey9@net-venture.com  
> To: grcrow@msn.com  
> Subject: Raiford  
> Date: Mon, 28 Sep 2009 08:32:53 -0700  
>  
> Please shoot me a declaration about his medical condition and our  
> attempts to get him into court. Coma, hospitalization that makes him unable  
> to be here. Thanks, BC  
>  
> Barbara Corey  
> Attorney at Law. PLLC  
> 901 South "I" Street, #201  
> Tacoma, WA 98405  
> 253.779.0844  
> 253.272.9220(fax)  
>  
>  
>

\_\_\_\_\_ Information from ESET Smart Security, version of virus signature database  
4464 (20090928) \_\_\_\_\_

The message was checked by ESET Smart Security.

<http://www.eset.com>

**Barbara**

**From:** margaret [cook.margaret@comcast.com]

**Sent:** Sunday, October 11, 2009 10:36 AM

**To:** Barbara Corey

**Subject:** Closing Arguments

Good Morning Barbara,

I am working on getting people there for closing arguments and needed to know if Pat Lachapelle, Michael Behe, Carl Howard and Terisha Schodron are allowed to be there.

Thank You, Margaret

\_\_\_\_\_ Information from ESET Smart Security, version of virus signature database 4498  
(20091011) \_\_\_\_\_

The message was checked by ESET Smart Security.

<http://www.eset.com>

## Barbara

---

**From:** Stephen Penner [спенner@co.pierce.wa.us]  
**Sent:** Tuesday, October 13, 2009 8:57 AM  
**To:** 'Barbara Corey'; Geri Markham; Maureen Goodman  
**Subject:** RE: ADDITIONAL LIMITING INSTRUCTION FOR GARLAND

The State will object to this additional instruction. Perhaps we can address it when we appear before the judge to do exceptions.

-----Original Message-----

From: Barbara Corey [mailto:bcorey9@net-venture.com]  
Sent: Monday, October 12, 2009 4:29 PM  
To: Geri Markham; Stephen Penner; Maureen Goodman  
Subject: ADDITIONAL LIMITING INSTRUCTION FOR GARLAND  
Importance: High

Sorry this is late. Just thought of it. Thanks, B

Barbara Corey  
Attorney at Law. PLLC  
901 South "I" Street, #201  
Tacoma, WA 98405  
253.779.0844  
253.272.9220 (fax)

Information from ESET Smart Security, version of virus signature database 4503  
(20091013) - \_\_\_\_\_ ..

The message was checked by ESET Smart Security.

<http://www.eset.com>

**Barbara**

**From:** Stephen Penner [spenner@co.pierce.wa.us]  
**Sent:** Thursday, October 29, 2009 9:04 AM  
**To:** 'Barbara Corey'; Geri Markham  
**Cc:** Maureen Goodman  
**Subject:** Garland - Argument on Count IV

Barbara & Geri,

I propose we schedule the argument on Count IV on Mr Garland's case for next Friday, November 6. The State is available any time that day. At that time we could also discuss the schedule for Mr. Garland's motion to dismiss.

Barbara, is you want to do it sooner, we're available any day next week except Monday.

Stephen M. Penner  
Pierce County Prosecutor's Office  
tel (253) 798-7314  
fax (253) 798-6636  
spenner@co.pierce.wa.us

Information from ESET Smart Security, version of virus signature database 4555  
(20091029)

The message was checked by ESET Smart Security.

<http://www.eset.com>

## Barbara

---

**From:** Stephen Penner [спенner@co.pierce.wa.us]  
**Sent:** Thursday, October 15, 2009 1:21 PM  
**To:** 'Barbara Corey'; Geri Markham; Maureen Goodman  
**Cc:** 'Gerald Crow'  
**Subject:** RE: DEFENDANT'S MOTION TO DISMISS WITH TESTMONY

The State would prefer to discuss scheduling of the motion on the record when we're next in court.

-Penner, 7314

-----Original Message-----

**From:** Barbara Corey [mailto:bcorey9@net-venture.com]  
**Sent:** Thursday, October 15, 2009 1:19 PM  
**To:** Geri Markham; Stephen Penner; Maureen Goodman  
**Cc:** 'Gerald Crow'  
**Subject:** DEFENDANT'S MOTION TO DISMISS WITH TESTMONY  
**Importance:** High

Judge Felnagle ruled that this motion would be heard after trial.  
Of course, the trial has ended and we are simply waiting for the jury's verdict.  
Please let us know the earliest date that we can have this motion.  
Thanks, BC

Barbara Corey  
Attorney at Law. PLLC  
901 South "I" Street, #201  
Tacoma, WA 98405  
253.779.0844  
253.272.9220 (fax)

Information from ESET Smart Security, version of virus signature database 4511  
(20091015)

The message was checked by ESET Smart Security.

<http://www.eset.com>

**From:** Stephen Penner  
**Sent:** Tuesday, November 10, 2009 2:44 PM  
**To:** Geri Markham  
**Cc:** 'Barbara Corey'; Maureen Goodman  
**Subject:** Garland - Scheduling

Geri,

I've just traded e-mails with Ms. Corey. Would it be possible to schedule something for 11/17 or 11/18. We would like to do the following:

- (1) argument on count IV;
- (2) argument on defendant's motion to reconsider whether there will be an evidentiary hearing on defendant's motion to dismiss; and
- (3) argument and ruling on defendant's motion for out-of-county judge to hear the motion to dismiss.

Once the judge rules on (2) and (3) we'll know when and where to schedule the motion to dismiss.

Could you check with the judge to see if that could work? Ms. Corey is heavily booked on the 20th, so that's why we're suggesting the 17th or 18th.

Thanks!

Stephen M. Penner  
Pierce County Prosecutor's Office  
tel (253) 798-7314  
fax (253) 798-6636  
spenner@co.pierce.wa.us

Information from ESET Smart Security, version of virus signature database 4605 (20091113)

The message was checked by ESET Smart Security.

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Information from ESET Smart Security, version of virus signature database 4605 (20091113)

The message was checked by ESET Smart Security.

<http://www.eset.com>

Information from ESET Smart Security, version of virus signature database 4605 (20091113)

The message was checked by ESET Smart Security.

## Barbara

**From:** Geri Markham [gmarkha@co.pierce.wa.us]

**Sent:** Monday, November 30, 2009 10:03 AM

**To:** Stephen Penner; 'Barbara Corey'

**Cc:** Maureen Goodman; Thomas Felnagle

**Subject:** RE: Garland Motions

I am working for Judge Orlando today. I will try and get together with him to find out when he would like to hear these. We had Friday PM set aside so it may be a little hard to get someone to cover us this week

Barbara, what is your availability?

Can you both please communicate and agree on some times? Thanks. Geri

**From:** Stephen Penner

**Sent:** Monday, November 30, 2009 9:17 AM

**To:** 'Barbara Corey'; Geri Markham

**Cc:** Maureen Goodman

**Subject:** Garland Motions

Hello Geri & Barbara,

I just realized that I have a conflict this Friday afternoon. My son has a doctor appointment that I need to take him to. Given that Judge Felnagle is in CDPJ anyway, would it be possible to reschedule these to the morning, or even to another day like Thursday or Monday? I would really appreciate it. Thanks.

-Steve

Information from ESET Smart Security, version of virus signature database 4650  
(20091130)

The message was checked by ESET Smart Security.

<http://www.eset.com>

**Barbara**

**From:** Stephen Penner [спенner@co.pierce.wa.us]

**Sent:** Monday, January 04, 2010 4:33 PM

**To:** Michelle Evans; 'Barbara Corey'

**Cc:** Thomas Felnagle; Maureen Goodman

**Subject:** RE: Garland

Confirmed. The State will be there.

**From:** Michelle Evans

**Sent:** Monday, January 04, 2010 4:33 PM

**To:** 'Barbara Corey'; Stephen Penner

**Cc:** Thomas Felnagle

**Subject:** Garland

Confirming Garland motions on **Wednesday, January 6, 2010 @ 9:00 am**. Please advise.  
Thank you.

**Michelle Evans** | Judicial Assistant | Pierce County Superior Court | Dept. #9 | 930 Tacoma Avenue South, Room 833, Tacoma, WA 98402 | Phone: (253) 798-3655 | Fax: (253) 798-7214 | Email: mevans@co.pierce.wa.us

\_\_\_\_\_ Information from ESET Smart Security, version of virus signature database 4745  
(20100105) \_\_\_\_\_

The message was checked by ESET Smart Security.

<http://www.eset.com>

**Barbara**

**From:** Stephen Penner [спенner@co.pierce.wa.us]  
**Sent:** Monday, January 04, 2010 4:33 PM  
**To:** Michelle Evans; 'Barbara Corey'  
**Cc:** Thomas Felnagle; Maureen Goodman  
**Subject:** RE: Garland

Confirmed. The State will be there.

**From:** Michelle Evans  
**Sent:** Monday, January 04, 2010 4:33 PM  
**To:** 'Barbara Corey'; Stephen Penner  
**Cc:** Thomas Felnagle  
**Subject:** Garland

Confirming Garland motions on **Wednesday, January 6, 2010 @ 9:00 am**. Please advise.  
Thank you.

**Michelle Evans** | Judicial Assistant | Pierce County Superior Court | Dept. #9 | 930 Tacoma Avenue South, Room 833, Tacoma, WA 98402 | Phone: (253) 798-3655 | Fax: (253) 798-7214 | Email: mevans@co.pierce.wa.us

\_\_\_\_\_ Information from ESET Smart Security, version of virus signature database 4745  
(20100105) \_\_\_\_\_

The message was checked by ESET Smart Security.

<http://www.eset.com>

**Barbara**

**From:** Stephen Penner [spenner@co.pierce.wa.us]  
**Sent:** Tuesday, March 16, 2010 3:55 PM  
**To:** 'Barbara'  
**Subject:** RE: Garland Motions 3/16

Barbara,  
Sorry about the confusion this morning. Based on the e-mail below and what you said in court, plus you not feeling too well, I thought (perhaps too hopefully) that you were streamlining the dismissal motion and just wanted to argue the merits as is. Oh well.  
At least now we have dates and a logical way to approach it. If you have any other issues arise that would require moving the dates, just let me know. I hope you start feeling better soon.  
-Penner

**From:** Barbara [mailto:barbara@bcoreylaw.com]  
**Sent:** Monday, March 15, 2010 4:36 PM  
**To:** Michelle Evans  
**Cc:** Stephen Penner; Maureen Goodman  
**Subject:** RE: Garland Motions 3/16

I am probably ok with this if I am not in trial.  
I would like to argue the motion for dismissal as that will affect other things.

I am in the process of moving my office and it is hell. Don't ask me to do too much.

Thanks, Barbara

**From:** Michelle Evans [mailto:mevans@co.pierce.wa.us]  
**Sent:** Monday, March 15, 2010 9:48 AM  
**To:** 'barbara@bcoreylaw.com'  
**Cc:** Stephen Penner; Maureen Goodman  
**Subject:** Garland Motions 3/16

Barbara,

Please let me know your status regarding Garland motions scheduled for tomorrow (3/16) at 9:00 a.m. I wrote to Kim Thursday and she was going to check with you and get back to me. I have not heard from her. Thank you.

*Michelle Evans*  
*Pierce County Superior Court*  
*Judicial Assistant Dept #15*  
*930 Tacoma Avenue South*  
*Tacoma, WA 98402*  
*(253) 798-3966*

Information from ESET Smart Security, version of virus signature database 4946 (20100315)

The message was checked by ESET Smart Security.

<http://www.eset.com>

Information from ESET Smart Security, version of virus signature database 4950  
(20100316)

The message was checked by ESET Smart Security.

<http://www.eset.com>

**Barbara**

**From:** Sheri Schelbert [sschelb@co.pierce.wa.us]

**Sent:** Monday, May 03, 2010 12:21 PM

**To:** 'BCOREY9@NET-VENTURE.COM'

**Subject:** GARLAND

Sorry to be a bother, but I would like to get a copy of the paperwork you quoted from this morning. I don't believe it was the Special Bulletin. It was the quote that said something about the assistant u.s. attorney and doing what they can to get Bolding, Behe, etc. locked up soon and Jason being afraid to appear in a hearing....(I'm going from memory here.) But anyway, it was a memo, and can you let me know if that memo is filed on linx so I can get a copy of it. It's hard for me to know where the quote starts and ends, and it was also read fast :) so I want to make sure it's accurate.

Thanks so much!!!!

**Barbara**

**From:** Maureen Goodman [mgoodma@co.pierce.wa.us]  
**Sent:** Tuesday, June 08, 2010 10:24 AM  
**To:** Michael Kawamura; Pamela Cvitanovic  
**Cc:** 'bcorey9@net-venture.com'; 'Kim Redford'; Stephen Penner; Wayne Smith; Michelle Evans  
**Subject:** Raymond Garland 04-1-05310-4 & 04-1-05384-8

Mr. Kawamura,  
Judge Felnagle has allowed Ms. Corey to withdraw from both of Mr. Garland's cases because of a conflict. Sentencing on the murder case is set for 7/9/10 at 1:30 pm. The court found Mr. Garland indigent in November of 2009, however, I believe the Ms. Corey had been acting as retained counsel on the murder case. DAC was previously appointed on the assault case. Trial on the assault case is set for this Thursday 6/10/10. I am adding a return with attorney hearing for the trial date. The court wanted both Ms. Corey and the State to notify you of the results of today's hearing. Please ensure that whoever is appointed can be available and ready on the 7/9/10 sentencing date.

Thank you,

Maureen C. Goodman  
Deputy Prosecuting Attorney  
Robbery/Assault Unit  
930 Tacoma Avenue South room 946  
Tacoma, WA 98402  
Phone: 253-798-7273  
Fax: 253-798-6636

**Barbara**

**From:** margaret [cook.margaret@comcast.com]

**Sent:** Wednesday, November 11, 2009 4:46 PM

**To:** Barbara Corey

**Subject:** I'm Home

Hi Barbara,

I am home safe and I will come to your office tomorrow around 4:15pm hopefully you will be available so I can get a quick update on Ray's case. thank you, Margaret.

\_\_\_\_\_ Information from ESET Smart Security, version of virus signature database 4597  
(20091111) \_\_\_\_\_

The message was checked by ESET Smart Security.

<http://www.eset.com>

# Backlund & Mistry

## Attorneys at Law

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Jodi R. Backlund  
Manek R. Mistry

Skylar T. Brett, Staff Attorney  
Valerie Greenup, Legal Assistant  
Quinn Raves, Legal Assistant

April 14, 2015

Barbara Corey, Attorney  
902 S 10th St  
Tacoma, WA 98405-4537

Re: *In re the Personal Restraint of Raymond Garland*  
County Cause No: 04-1-05384-8  
Court of Appeals No: 45165-4-II

Dear Ms. Corey:

Thanks for responding to our request for your complete unredacted file relating to your representation of Raymond Garland.

We received the packet of emails you provided in response to our request. The first email is from July 31, 2009; the last is from May 3, 2010. The packet you sent consists of 47 pages.

I just wanted to confirm that these emails are all that you have concerning your representation of Mr. Garland, and that you do not have copies of discovery, motions or other pleadings you filed or received from the prosecutor, court orders, other court documents, paper correspondence, paper or electronic notes, internal memoranda, time logs, billing statements, and so forth.

I ask because it seems very unusual that these emails would be the only surviving information relating to a client you represented through three trials over the course of five years.

In your letter of March 4, 2015, you indicated that you and Mr. Crow kept “a large single joint file on each witness and other important investigative case issues,” that the files contained work product, and that the files were destroyed.

From the information you’ve provided, it sounds like you kept no physical or electronic file in your own office. If this is not correct, please contact us immediately.

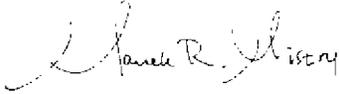
If we don’t hear from you, we will assume that our understanding is correct.

Corey Letter – Page 2

Thanks for your help.

Respectfully,

**BACKLUND & MISTRY**

A handwritten signature in cursive script that reads "Manek R. Mistry".

Manek R. Mistry  
Attorney at Law

## Law Offices of Barbara Corey, PLLC

902 South 10<sup>th</sup> Street, Tacoma, WA 98405 PH:253.779.0844 FAX:253.272.6439

---

**Barbara Corey**, Attorney at Law  
barbara@bcoreylaw.com

Kim Redford, Legal Assistant  
kim@bcoreylaw.com

**Warren J. Corey-Boulet**, Attorney at Law  
warren@bcoreylaw.com

April 20, 2015

Manek R. Mistry  
P.O. Box 6490  
Olympia, WA 98504

*Re: In re the Personal Restraint Petition of Raymond Garland*  
PCSS No. 04-1-05384-8  
COA No. 45165-4-II

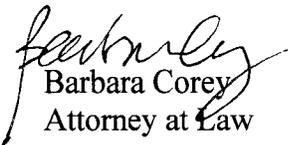
Dear Mr. Mistry:

In response to your letter dated April 14, 2015, please note the following:

1. During the years that I represented Mr. Garland, I used a HP computer that is no longer operable [corrupted hard drive and other reasons]. I switched to a MacBook sometime after my representation of him ended. To obtain the emails that I sent to you required the expenditure of funds on my part to have an expert retrieve what could be retrieved from the corrupted hard drive. I believe we were fortunate to recover what we did. Thus, it is not, as your claim "very unusual" that these emails are all that I have. I very well understand my ethical obligations and, make no mistake, went out of my way to provide to you everything that I could provide. If you are suggesting that I am withholding information, your innuendo is not only wrong but also deeply offensive.
2. I did not retain copies of court documents such as motions, pleadings, court documents, etc., as all filed documents are readily available from the LINX system.
3. I note that a complete copy of discovery is available from LESA.

4. All of my notes, internal memoranda, paper correspondence, etc., [as well as those of Bob Crow] were in the complete file set that Bob Crow and I determined to consolidate and place at his office. The individual witness files contained all discovery pertaining to that witness, testimony relevant to that witness, officer interview notes, witness interview notes, criminal history, etc. The materials in this case were voluminous. Bob and I had cross-indexed them and made extensive notes that made sense to us when our sets of materials were viewed side by side. There were thousands of pages of materials. I sincerely regret that these materials are not available for your review. However, as I have informed you, not only did Mr. Crow pass away but also his office thereafter was flooded with raw sewage. Mr. Crow would have been able to corroborate what I am telling you about our master file system and storage. I know that your investigator spoke to Bob's son Jerry Crow, also an investigator. I trust that Jerry affirmed that the master file was destroyed during the sewage disaster that required a haz mat team to clean up.
5. I did not have billing statements for the client as this was a flat fee case. I believe that Bob Crow had his own payment arrangements with Margaret Cooke. We used Kay Sweeney as an expert at the third trial and I know he was paid. I know what our account has a record of that. I also know that our accountant has a record of the hours worked on this case. We keep such a record in every case. Mr. Hay would be able to print out the time logs for you.
6. Our accountant, William Hay, presently is out of state, tending to a family emergency in the State of Virginia. I do have regular contact with him.
7. Bob Crow and I worked together on dozens of cases over the years. We had a close working relationship and, after trial, ensured that our files were maintained 100% together. Had we been able to foresee the disasters that later occurred, we obviously would have taken different actions.
8. The system that Bob and I proved to be a reliable and workable system. Regrettably the storage system was not perfect. No storage system for physical boxes, etc. is. That is why, like most firms, we now store our files on disc.

Please feel free to contact me if you have any other questions or concerns.

  
Barbara Corey  
Attorney at Law

cc: Thomas Roberts, Appellate Unit, Pierce County Prosecuting Attorney's Office

Attention: Public Records Officer  
 Corrections  
 910 Tacoma Ave. S.  
 Tacoma, WA 98402  
 Ph: 253.798.7769  
 Fx: 253.798.6712

**Pierce County**  
**Request for Access to Public Records**



**Requests and production are governed by Chapter 42.56 RCW and Chapter 2.04 Pierce County Code (PCC)**

Instructions: 1. Complete Section A of the form. Please print.  
 2. Mail, deliver, or fax completed form to the public records officer for the Pierce County Department/Office shown above, *do not send via Email.*

**SECTION A Requester / Records Request Information - Please PRINT**

Requester Name Manek Mistry	Business Name Backlund and Mistry
Mailing Address PO Box 6490	City, State – Zip Code Olympia, WA 98507
Phone Number 360-339-4870	Fax Number n/a

**Select one:**

- Do not make copies, but allow review. PCC Chapter 2.04. I may request copies of specific pages after review.  
 Mail copies\*  Hold copies for pickup\* (prior payment is required for copies mailed or picked up).  
 \*I understand that I will be charged \$.15 per page or the published cost of copies requested, whichever is greater, plus mailing cost, if mailing is requested. PCC Chapter 2.04.

Please describe the SPECIFIC record(s) you are requesting, including dates(s):

- Jail visit logs pertaining to inmate Raymond Garland from November 13, 2008 through January 30, 2009, especially all logs pertaining to attorney and investigator visits and visits from other professionals.
- Jail telephone records pertaining to inmate Raymond Garland from November 13, 2008 through January 30, 2009, showing any calls made or received, especially all attorney calls.
- Jail visit logs pertaining to inmate Raymond Garland from November 3, 2009 through June 8, 2010, especially all logs pertaining to attorney visits and visits from other professionals.
- Jail telephone records pertaining to inmate Raymond Garland from November 3, 2009 through June 8, 2010, showing any calls made or received, especially all attorney calls.

\_\_\_\_\_  
 Signature of Requester

2/26/15  
 \_\_\_\_\_  
 Date Submitted

**SECTION B The following must also be signed ONLY if you request any list of individuals.**

I declare under penalty of perjury under the laws of Washington that the following is true and correct: I will not use any requested list of individuals for a commercial purpose (profit expecting activity).

Signed this 26 day of February, 2015 at Olympia (city), WA (state). RCW 42.56.070(9) and PCC 2.04.030(D)(5)

**Requester's Signature:** \_\_\_\_\_ **Appendix - 60**



# Pierce County

## Sheriff of Pierce County

930 Tacoma Avenue South  
Tacoma, Washington 98402

March 16, 2015

Manek Mistry  
Backlund and Mistry  
P.O. Box 6490  
Olympia, WA 98507

Re: Your Public Disclosure Request  
Our file #1503016

To: Manek Mistry

Your public disclosure request dated February 26, 2015 was received in our office on March 4, 2015. You have requested copies of the following records for Raymond Garland.

- 1) Jail professional visiting logs from November 13 2008 to January 30, 2009.
- 2) Jail phone records from November 13, 2008 to January 30, 2009.
- 3) Jail professional visiting logs from November 3, 2009 to June 8, 2010.
- 4) Jail phone records from November 3, 2009 to June 8, 2010.

Our search is now complete and includes four pages of professional visiting logs. Please be advised that inmate records are held in confidence and will not be disclosed without written permission from the named inmate per RCW 70.48.100(2) Jail register, open to the public—Records confidential—Exception which states that the records of a person confined in jail shall be held in confidence. You may send a signed release form to the above address attn: Public Disclosure Unit and noting the file number or you may send the form via fax to (253) 798-6712.



## Pierce County

### Sheriff of Pierce County

930 Tacoma Avenue South  
Tacoma, Washington 98402

You may remit payment of one dollar and nine cents (4 pages at 0.15 cents per page plus 0.49 cents postage) in guaranteed funds, payable to Pierce County. Note that we cannot accept cash or personal checks. You may also authorize us to deduct that amount from your inmate account.

Once the signed release and payment have been received we will send the documents. Please feel free to contact my office with any questions.

Thank you,

Corrections Deputy Tamara Pihl  
Public Disclosure Unit–Corrections  
Pierce County Sheriff's Department



# Pierce County

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## Sheriff of Pierce County

930 Tacoma Avenue South  
Tacoma Washington 98402

April 28, 2015

Manek Mistry  
Backlund and Mistry  
P.O. Box 6-90  
Olympia, WA 98507

Re: Your Public Disclosure Request  
Our file #1503016

To: Manek Mistry

We have received your payment of \$1.09 and the signed release by Mr. Garland, releasing his jail records to you. You have requested copies of the following records for Raymond Garland.

- 1) Jail professional visiting logs from November 13 2008 to January 30, 2009.
- 2) Jail phone records from November 13, 2008 to January 30, 2009.
- 3) Jail professional visiting logs from November 3, 2009 to June 8, 2010.
- 4) Jail phone records from November 3, 2009 to June 8, 2010.

Be advised that jail phone recordings are kept for one year. No phone records were located for the time frame specified. We did locate four pages of professional visiting records. Note that the document has been redacted to remove the names of other inmates per RCW 70.48.100(2) Jail register, open to the public —Records confidential—Exception which states that the records of a person confined in jail shall be held in confidence.

Please find the requested records enclosed with this letter, as well as an exemption log for your reference. Feel free to contact my office with any questions.

Thank you.



Corrections Deputy Tamara Pihl  
Public Disclosure Unit - Corrections  
Pierce County Sheriff's Department



EXEMPTION LOG , REQUEST #1503016 Mistry

Redaction Code	Redacted Material	Exemption
1	Redacted material consist of Inmate Names	RCW 70.48.100(2) Jail register, open to the public Records confidential Exception. The records of a person confined in jail shall be held in confidence.

11/3/2009	Whitehead, Richard	Dac	1	4SB 2	1415	1455
11/3/2009	Morton, Donna	DOC	1	4SB2/	1425	1455
11/3/2009	austrin, richard	atty	Multiple Hearings	4th flr	1300	1455
11/3/2009	AUSTRING, RICHARD	PI	1	3C56	1440	1510
11/3/2009	Barnett, Devitt	atty	1	3SC 4	1420	1532
11/3/2009	Nagle, Michael	atty	1	3WA14	1540	1623
11/3/2009	Thornton, Philip	atty	1	4EE 9	1645	1705
11/3/2009	McGuinness, Tim	atty	1	4D53	1635	1710
11/3/2009	McGuinness, Tim	atty	1	5C55	1635	1710
*****						
11/4/2009	Williams, Electa	DOC	1	3EA 1	815	920
11/4/2009	Williams, Hilary	DOC	1	3WB26	815	1045
11/4/2009	Ray, Sherry	DOC	1	4WB28	815	1220
11/4/2009	Ray, Sherry	DOC	1	3WB26	815	1220
11/4/2009	Ray, Sherry	DOC	1	4D72	815	1220
11/4/2009	Ray, Sherry	DOC	1	4SC16	815	1220
11/4/2009	Ray, Sherry	DOC	1	5WB10	815	1220
11/4/2009	Ray, Sherry	DOC	1	3B68	815	1220
11/4/2009	Ray, Sherry	DOC	1	3C81	815	1220
11/4/2009	Andritch, Lisa	DOC	1	4WB28	815	1220
11/4/2009	Andritch, Lisa	DOC	1	3WB26	815	1220
11/4/2009	Andritch, Lisa	DOC	1	4D72	815	1220
11/4/2009	Andritch, Lisa	DOC	1	4SC16	815	1220
11/4/2009	Andritch, Lisa	DOC	1	5WB10	815	1220
11/4/2009	Andritch, Lisa	DOC	1	3B68	815	1220
11/4/2009	Andritch, Lisa	DOC	1	3C81	815	1220
11/4/2009	Corey, Barbara	Atty	1	3NA12	840	942
11/4/2009	Corey, Barbara	Atty	1	4NC26	840	942
11/4/2009	Corey, Barbara	Atty	1	3C3	840	942
11/4/2009	Trowbridge, Brett	MHP-Psychologist	1	3EC 1	848	1220
11/4/2009	Trowbridge, Brett	MHP-Psychologist	1	5WC18	848	1220
11/4/2009	Emm, Stephen	Prosec ofc	1	3NB 6	840	859
11/4/2009	Emm, Stephen	Prosec ofc	1	5WC17	840	859
11/4/2009	Asaeli, Tofu	chap vol	1	4WC	904	1005
11/4/2009	Bowers, Kenneth-Tacoma Police		1	5WB 7	936	1015
11/4/2009	Sugai, Craig-Tacoma Police		1	5WB 7	936	1015

11/4/2009	Crow, Gerald	PI	Garland, Raymond	4NC26	1040	1100
11/4/2009	Sofia, Joe	DOC	1	3WB 1	1225	1243
11/4/2009	Comte, Michael	Psycho-Therapist	1	4EF10	1310	1445
11/4/2009	Bjork, Amit	Atty	1	3C68	1615	1700
11/4/2009	Huff, Curtis	Atty	1	3D84	1445	1550
11/4/2009	Blanford, Kenneth	Atty	1	4D61	1440	1450
*****						
11/5/2009	Carrillo, Kimberly	DOC	1	4ED 5	800	858
11/5/2009	Opgenorth, Mary	Atty	1	4ED 5	805	858
11/5/2009	Voie, Edward	DOC	1	3EC 8	817	901
11/5/2009	Morton, Donna	doc	1 reg	4sa23	900	1310
11/5/2009	Morton, Donna	doc	1	4d50	900	1310
11/5/2009	Morton, Donna	doc	1	3c26	900	1310
11/5/2009	Morton, Donna	doc	1	4sb27	900	1310
11/5/2009	Morton, Donna	doc	1	4d77	900	1310
11/5/2009	Morton, Donna	doc	1	3a7	900	1310
11/5/2009	Morton, Donna	doc	1	3b79	900	1310
11/5/2009	Morton, Donna	doc	1	3c42	900	1310
11/5/2009	Morton, Donna	doc	1	4sa23	900	1310
11/5/2009	Ray, Sherry	doc	1	4d50	900	1310
11/5/2009	Ray, Sherry	doc	1	3c26	900	1310
11/5/2009	Ray, Sherry	doc	1	4sb27	900	1310
11/5/2009	Ray, Sherry	doc	1	4d77	900	1310
11/5/2009	Ray, Sherry	doc	1	3a7	900	1310
11/5/2009	Ray, Sherry	doc	1	3b79	900	1310
11/5/2009	Ray, Sherry	doc	1	3c42	900	1310
11/5/2009	Ray, Sherry	doc	1	3EB14	910	953
11/5/2009	Deyo, Darlene	DAC	1	3NA15	1015	1145
11/5/2009	Hershman, Bryan	Atty	1	4SC 4	1015	1145
11/5/2009	Hershman, Bryan	Atty	1	3WC 1	1015	1145
11/5/2009	Hershman, Bryan	Atty	1	3WC27	1015	1145
11/5/2009	Hershman, Bryan	Atty	1	3NC12	1046	1111
11/5/2009	Kelly, Michael	Atty	1	4WC26	1057	1133
11/5/2009	Good, Richard	DOC	1	5WC 7	1125	1145
11/5/2009	Slavig, Kier-Deputy	PCSO	1	4NB11	1140	1230
11/5/2009	Jackson, Denise	DOC	1	4NB10	1140	1230
11/5/2009	Jackson, Denise	DOC	1	4SB31	1140	1230
11/5/2009	Jacksuri, Denise	DOC	1			

11/20/2009	sofia, joe	doc	1	4nb30	1145	1218
11/20/2009	Jackson, Richard	doc	1	4nb20	1210	1300
11/20/2009	Jackson, Richard	doc	1	4nb19	1210	1300
11/20/2009	Jackson, Richard	doc	1	4wa24	1210	1300
11/20/2009	Jackson, Richard	doc	1	4na18	1210	1300
11/20/2009	Tolzin, Leslie	atty	1	4sb26	1200	1230
11/20/2009	Jackson, Richard	DOC	1	3A65	1315	1348
11/20/2009	Boyle, Ryan-Bonney Lake Police Department	DOC	1	4D66	1349	1510
11/20/2009	Hansen, Jonathan	ATF	1	4D66	1349	1510
11/20/2009	Alfaro, Russell	DOC	1	3B73	1355	1430
11/20/2009	Martin, Vanessa	atty	1	3ed15	1300	1339
11/20/2009	Martinez, Manuel	doc	1	3na4	1320	1410
11/20/2009	Voie, Edward	DOC	1	2C80	1420	1431
11/20/2009	Garwood, Christopher	DOC	1	2C80	1420	1431
11/20/2009	macfie, keith	atty	1	5wc26	1330	1420
11/20/2009	Corey, Barbara	atty	1	3c20	1415	1445
11/20/2009	Corey, Barbara	atty	1	4nc26	1415	1445
11/20/2009	oliver, james	invol comm	1	4sb29	1325	1440
11/20/2009	Corey, Barbara	atty	1	3C20	1450	1503
11/20/2009	Pierson, Jane	atty	1	3B7	1517	1535
11/20/2009	Gant, Steve	atty	1	3D66	1530	1545
11/20/2009	Hayes, Charles	GS MHP	1	3D10	1445	1537
11/20/2009	Boylan, John	Catholic Chaplain	1	4D81	1500	1708
11/20/2009	Boylan, John	Catholic Chaplain	1	4D 4	1500	1708
11/20/2009	Boylan, John	Catholic Chaplain	1	4D54	1500	1708
11/20/2009	Boylan, John	Catholic Chaplain	1	4D 6	1500	1708
11/20/2009	Boylan, John	Catholic Chaplain	1	4D43	1500	1708
11/20/2009	Parker, Michael	chap vol	new jail AA	new jail	1840	2009
11/20/2009	Gravseth, Michael	chap vol	new jail AA	new jail	1840	2009
11/20/2009	Jackson, Leroy	chap vol	new jail AA	new jail	1842	2009
11/20/2009	Kuykendall, Deborah	chap vol	old jail religious services	5W	1845	2001
11/20/2009	Bartholomew, Dorothy	chap vol	old jail religious services	5W	1845	2001
11/20/2009	Alfaro, Russell	DOC	1	3NA 5	1912	2005
11/20/2009	Alfaro, Russell	DOC	1	4WB13	1912	2005
11/20/2009	Alfaro, Russell	DOC	1	3B73	2013	2032
*****						
11/21/2009	Mann, Sheila	chap vol	new jail religious services	3D	1241	1410



**Raymond Garland**

Bill Hay <billhay4@gmail.com>

May 12 (2  
days ago)

to me

Attached is an itemized statement of time Barbara Corey spent on the Raymond Garland case with an explanation of each item. This is all the information I have on this matter.

**Barbara Corey, Attorney at Law**  
**Time by Job Detail**  
**All Transactions**

Date	Name	Duration	Notes
<b>Criminal (Private)/Barbara:Garland, Raymond</b>			
<b>Assigned:Class A Felony</b>			
02/07/2006	Corey, Barbara	2.20	
02/10/2006	Corey, Barbara	0.20	
Total Assigned:Class A Felony		2.40	
<b>Assigned:Class A+ Felony</b>			
10/04/2005	Corey, Barbara	2.30	
10/05/2005	Corey, Barbara	2.40	
Total Assigned:Class A+ Felony		4.70	
<b>Payment for Expertise:Civil</b>			
04/17/2006	Corey, Barbara	0.70	TC w/Ms. Cook, Bob Crowe
04/18/2006	Corey, Barbara	0.50	Scheduled bail hearing/court appearance and waiting
Total Payment for Expertise:Civil		1.20	
<b>Payment for Expertise:Criminal</b>			
10/17/2005	Corey, Barbara	0.80	
10/24/2005	Corey, Barbara	0.20	
11/04/2005	Corey, Barbara	0.20	
11/08/2005	Corey, Barbara	0.60	
11/09/2005	Corey, Barbara	4.20	
11/16/2005	Corey, Barbara	0.20	
11/18/2005	Corey, Barbara	0.50	
11/22/2005	Corey, Barbara	0.10	
11/23/2005	Corey, Barbara	0.20	
11/28/2005	Corey, Barbara	2.20	
11/29/2005	Corey, Barbara	0.20	
12/05/2005	Corey, Barbara	2.40	
12/06/2005	Corey, Barbara	0.50	
12/12/2005	Corey, Barbara	1.40	
01/17/2006	Corey, Barbara	1.70	
01/22/2006	Corey, Barbara	1.10	
01/23/2006	Corey, Barbara	3.30	
01/24/2006	Corey, Barbara	0.20	
01/25/2006	Corey, Barbara	2.70	
01/26/2006	Corey, Barbara	1.20	
01/27/2006	Corey, Barbara	2.60	
01/30/2006	Corey, Barbara	0.50	
02/01/2006	Corey, Barbara	1.30	
02/02/2006	Corey, Barbara	0.20	
02/03/2006	Corey, Barbara	0.40	
02/13/2006	Corey, Barbara	4.40	Review of new discovery materials; witness interviews of Ed Tro...
02/15/2006	Corey, Barbara	1.20	Preparation for witness interviews
02/16/2006	Corey, Barbara	0.30	TC w/DPA Penner re scheduling witness interviews and viewing...
02/19/2006	Corey, Barbara	2.30	Notes from S/W's for Franks motion
02/21/2006	Corey, Barbara	2.40	Trial preparation; Franks briefing
02/22/2006	Corey, Barbara	0.60	View of property taken by Dep. Jason Smith
02/24/2006	Corey, Barbara	1.60	Witness interviews
02/25/2006	Corey, Barbara	3.30	Legal research and trial preparation
03/10/2006	Corey, Barbara	0.40	Conference w/judicial assistant and prosecutor re court availability
03/13/2006	Corey, Barbara	2.30	TC w/client; file notes; trial preparation
03/14/2006	Corey, Barbara	0.50	Review of newly received transcripts of police officers Smith an...
03/15/2006	Corey, Barbara	1.00	Court appearance
03/29/2006	Corey, Barbara	0.60	Jail visit w/client
04/04/2006	Corey, Barbara	0.90	TC w/CPI, Inc. re employment records of Shana Blatnik; review...
04/13/2006	Corey, Barbara	0.60	Reviewed recently received discovery
04/19/2006	Corey, Barbara	0.10	TC w/client's mother
04/24/2006	Corey, Barbara	1.10	Trial Preparation
05/15/2006	Corey, Barbara	3.30	Trial preparation
05/23/2006	Corey, Barbara	0.20	TC w/Ms. Cook
05/25/2006	Corey, Barbara	0.30	Telephone conference w/Mike Howard re evidence evaluation; e...
06/05/2006	Corey, Barbara	0.30	TC w/DPA Penner re discovery issues
06/08/2006	Corey, Barbara	0.80	Review of newly received discovery; e-mail to investigator; discu...
06/13/2006	Corey, Barbara	0.20	TC w/Ms. Cook; e-mail to Bob Crow re to-do list
06/15/2006	Corey, Barbara	1.00	Conference w/investigator
06/20/2006	Corey, Barbara	2.20	Trial Preparation

**Barbara Corey, Attorney at Law**  
**Time by Job Detail**  
**All Transactions**

Date	Name	Duration	Notes
06/21/2006	Corey, Barbara	2.20	Trial preparation; meeting w/investigator
06/25/2006	Corey, Barbara	0.50	Trial preparation
06/26/2006	Corey, Barbara	0.10	TC w/Ms. Cook
06/28/2006	Corey, Barbara	0.75	Trial preparation; meeting with client
07/21/2006	Corey, Barbara	1.10	TC w/Ms. Cook; e-Mail to investigator; tc w/ME
07/24/2006	Corey, Barbara	0.20	TC w/DPA Penner re witness interviews
07/31/2006	Corey, Barbara	3.30	TC X2 w/DPA Penner re interviews; meeting w/investigator; trial...
08/02/2006	Corey, Barbara	0.50	TC X3 w/DPA Penner; tc w/Bob Crow
08/03/2006	Corey, Barbara	3.80	Evidence viewing in property room; meeting w/DPA Penner; trial...
08/04/2006	Corey, Barbara	2.70	Preparation for interviews
08/07/2006	Corey, Barbara	4.30	Pretrial interviews; preparation for next day's interviews
08/08/2006	Corey, Barbara	6.00	Preparation for interviews; interviews
08/09/2006	Corey, Barbara	5.10	Preparation for interviews and interviews
08/14/2006	Corey, Barbara	4.70	Review of new discovery; trial preparation; motion drafting; tc w/...
08/15/2006	Corey, Barbara	1.40	TC w/DPA Penner; trial preparation
08/16/2006	Corey, Barbara	5.00	Trial preparation
08/17/2006	Corey, Barbara	3.60	Preparation for interviews
08/18/2006	Corey, Barbara	5.60	Trial preparation; witness interviews; briefing
08/22/2006	Corey, Barbara	0.20	TC w/DPA Penner re scheduling witness interviews; tc w/Det. Hei...
08/23/2006	Corey, Barbara	2.60	TC w/Ms. Cook; property viewing; preparation and entry of order...
09/01/2006	Corey, Barbara	3.60	Trial preparation
09/11/2006	Corey, Barbara	0.10	TC w/Ms. Cook
09/12/2006	Corey, Barbara	3.80	Interviews; preparation for order for deposition
09/14/2006	Corey, Barbara	0.10	TC w/DPA Penner re order for deposition and interview schedul...
09/18/2006	Corey, Barbara	4.50	Pre-trial interviews
09/21/2006	Corey, Barbara	3.10	Witness interviews
09/25/2006	Corey, Barbara	3.60	E-mails w/Ms. Cook; witness interviews; legal research
09/26/2006	Corey, Barbara	0.40	TC w/Ms. Cook; tc w/DPA Penner; tc w/court re scheduling
09/27/2006	Corey, Barbara	5.70	Trial preparation; witness interviews; motions writing
09/28/2006	Corey, Barbara	1.00	Witness interview
10/02/2006	Corey, Barbara	2.70	Court appearance and waiting; witness interview; motion for dep...
10/04/2006	Corey, Barbara	0.30	TC w/DPA Penner re deposition of Belinda Wirtz; tc w/court re e...
10/10/2006	Corey, Barbara	3.00	Interviews
11/22/2006	Corey, Barbara	0.50	Preparation of order for court re witness interviews; court appea...
12/15/2006	Corey, Barbara	1.20	Court appearance
12/19/2006	Corey, Barbara	5.20	Pre-trial interviews; preparation
12/20/2006	Corey, Barbara	3.60	Pretrial interviews and issuance of subpoenas
12/21/2006	Corey, Barbara	3.60	Interviews and pre-trial preparation
12/26/2006	Corey, Barbara	3.40	TC X2 w/Ms. Cook; legal research
12/27/2006	Corey, Barbara	7.20	Trial preparation
01/03/2007	Corey, Barbara	1.30	Trial preparation
01/09/2007	Corey, Barbara	8.00	Trial/preparation
01/10/2007	Corey, Barbara	8.20	Trial preparation
01/11/2007	Corey, Barbara	8.80	Trial preparation
01/12/2007	Corey, Barbara	6.70	Trial preparation
01/16/2007	Corey, Barbara	8.70	Trial; preparation; witness interviews
01/17/2007	Corey, Barbara	8.30	Trial preparation; court and witness interviews
01/18/2007	Corey, Barbara	10.20	Court/suppression hearing; preparation
01/19/2007	Corey, Barbara	6.30	Preparation
01/22/2007	Corey, Barbara	9.60	Trial
01/23/2007	Corey, Barbara	9.70	Trial and preparation
01/24/2007	Corey, Barbara	9.70	Trial and trial preparation
01/25/2007	Corey, Barbara	9.70	Trial and trial preparation
01/26/2007	Corey, Barbara	8.30	Trial preparation
01/27/2007	Corey, Barbara	4.20	Pretrial preparation
01/29/2007	Corey, Barbara	3.30	Court; trial preparation
01/30/2007	Corey, Barbara	8.50	Trial day
01/31/2007	Corey, Barbara	9.60	Trial and preparation
02/01/2007	Corey, Barbara	8.30	Trial and preparation
02/02/2007	Corey, Barbara	3.60	Trial preparation
02/05/2007	Corey, Barbara	9.20	Trial and trial preparation
02/06/2007	Corey, Barbara	7.20	1/2 trial day and preparation
02/07/2007	Corey, Barbara	6.80	1/2 day court; mistrial
02/08/2007	Corey, Barbara	3.60	Research
02/14/2007	Corey, Barbara	1.00	Client conference in jail
02/15/2007	Corey, Barbara	2.10	Brief writing
02/16/2007	Corey, Barbara	5.20	Motion
02/19/2007	Corey, Barbara	0.70	Motion preparation

**Barbara Corey, Attorney at Law**  
**Time by Job Detail**  
**All Transactions**

Date	Name	Duration	Notes
02/23/2007	Corey, Barbara	2.60	Motions and preparation time
03/23/2007	Corey, Barbara	0.80	Review of findings for court presentation; court appearance
03/30/2007	Corey, Barbara	0.40	tc w/client and Ms. Cook
04/09/2007	Corey, Barbara	0.70	Court hearing
04/27/2007	Corey, Barbara	2.20	Trial preparation
05/01/2007	Corey, Barbara	3.60	Trial preparation
05/02/2007	Corey, Barbara	5.10	TC w/Ms. Cook; trial preparation
05/03/2007	Corey, Barbara	4.60	Trial preparation
05/04/2007	Corey, Barbara	4.30	Trial preparation
05/07/2007	Corey, Barbara	6.20	Preparation time
05/08/2007	Corey, Barbara	4.70	Trial preparation; interview of Kartlin Marcy
05/09/2007	Corey, Barbara	0.80	Court appearance
06/27/2007	Corey, Barbara	2.70	Trial preparation
07/17/2007	Corey, Barbara	1.20	Trial preparation
07/23/2007	Corey, Barbara	3.70	Trial preparation
07/24/2007	Corey, Barbara	4.70	Trial preparation
07/25/2007	Corey, Barbara	2.50	Trial preparation
07/26/2007	Corey, Barbara	5.70	Trial preparation
07/30/2007	Corey, Barbara	3.60	Witness interview and trial preparation
08/10/2007	Corey, Barbara	7.80	Trial preparation
08/12/2007	Corey, Barbara	2.20	Trial preparation
08/13/2007	Corey, Barbara	9.60	Full trial day and preparation
08/14/2007	Corey, Barbara	8.30	Full trial day and preparation
08/15/2007	Corey, Barbara	6.60	Trial preparation
08/16/2007	Corey, Barbara	5.00	Trial preparation
08/17/2007	Corey, Barbara	6.90	Trial preparation
08/20/2007	Corey, Barbara	5.70	1/2 Trial day and preparation
08/21/2007	Corey, Barbara	10.10	Trial day and preparation
08/22/2007	Corey, Barbara	9.10	Trial day and preparation
08/23/2007	Corey, Barbara	8.70	Trial day and preparation
08/24/2007	Corey, Barbara	5.10	Trial preparation
08/27/2007	Corey, Barbara	8.10	Trial day and preparation
08/28/2007	Corey, Barbara	9.50	Trial day and preparation
08/29/2007	Corey, Barbara	8.80	Trial day and preparation
08/30/2007	Corey, Barbara	7.30	Trial preparation
08/31/2007	Corey, Barbara	4.60	Trial preparation
09/03/2007	Corey, Barbara	1.10	Trial preparation
09/04/2007	Corey, Barbara	6.90	Trial preparation and 1/2 trial day
09/05/2007	Corey, Barbara	9.30	Trial day and preparation
09/06/2007	Corey, Barbara	8.10	Trial day and preparation
09/07/2007	Corey, Barbara	5.80	Trial preparation
09/10/2007	Corey, Barbara	10.30	1/2 Trial Day; Trial preparation
09/11/2007	Corey, Barbara	5.20	1/2 Trial day and preparation
09/12/2007	Corey, Barbara	4.00	Trial preparation
09/13/2007	Corey, Barbara	4.70	Trial preparation
09/14/2007	Corey, Barbara	3.10	Trial preparation
09/17/2007	Corey, Barbara	5.20	Trial preparation
09/18/2007	Corey, Barbara	8.90	Deposition of Det. Heishmann; motions
09/19/2007	Corey, Barbara	5.90	Preparation
09/20/2007	Corey, Barbara	5.80	1/2 trial day; preparation
09/21/2007	Corey, Barbara	4.90	Trial preparation; review of newly received discovery; meeting w...
09/24/2007	Corey, Barbara	5.10	1/2 Trial Day and preparation; court appearance for re-assignm...
09/27/2007	Corey, Barbara	0.20	TC w/Ms. Cook
09/28/2007	Corey, Barbara	0.60	TC w/court re scheduling
10/12/2007	Corey, Barbara	1.00	Court appearance
10/25/2007	Corey, Barbara	2.40	Meeting w/investigator and client's mother
12/07/2007	Corey, Barbara	0.70	Court appearance
12/19/2007	Corey, Barbara	0.50	TC w/court reporter; tc w/prosecutor re hearing
12/26/2007	Corey, Barbara	1.40	Prepared and filed motion
01/09/2008	Corey, Barbara	0.20	TC w/Ms. Cook
01/11/2008	Corey, Barbara	0.70	Motion
03/03/2008	Corey, Barbara	0.30	Entry of court order
03/21/2008	Corey, Barbara	0.70	Client meeting
03/31/2008	Corey, Barbara	0.20	TC w/client
04/11/2008	Corey, Barbara	0.70	Court appearance
05/09/2008	Corey, Barbara	0.50	Presentation of order on motions in limine
06/18/2008	Corey, Barbara	0.30	TC w/client's mother
06/20/2008	Corey, Barbara	0.50	Jail visit w/client

**Barbara Corey, Attorney at Law**  
**Time by Job Detail**  
**All Transactions**

Date	Name	Duration	Notes
08/01/2008	Corey, Barbara	0.20	E-mail to Ms. Cook
08/08/2008	Corey, Barbara	1.20	TC w/Ms. Cook re motion to dismiss
08/15/2008	Corey, Barbara	2.10	Drafting motion
08/18/2008	Corey, Barbara	0.70	Meeting w/Ms. Cook
09/03/2008	Corey, Barbara	1.30	Presentation of order and preparation of response for motion
09/04/2008	Corey, Barbara	1.10	Drafted response to motion
09/05/2008	Corey, Barbara	1.10	Court appearance
09/09/2008	Corey, Barbara	0.30	Review of newly received discovery
09/12/2008	Corey, Barbara	1.70	Meeting w/investigator and Ms. Cook; discovery demands filed
09/18/2008	Corey, Barbara	0.50	Motions; discussion w/prosecutor
09/26/2008	Corey, Barbara	1.00	Discovery motions
10/01/2008	Corey, Barbara	1.00	Review of newly received discovery; tc w/Bob Crow, Ms. Cook
10/03/2008	Corey, Barbara	0.80	TC w/DPA; review of newly received materials
10/10/2008	Corey, Barbara	0.50	TC w/Ms. Cook; review of newly received documents
10/23/2008	Corey, Barbara	0.60	Short meeting w/Bob Crowe
11/04/2008	Corey, Barbara	0.70	Court hearing re scheduling
11/21/2008	Corey, Barbara	0.70	Meeting w/DPA re case
11/24/2008	Corey, Barbara	0.30	TC w/Ms. Cook
12/03/2008	Corey, Barbara	2.40	Briefing and preparation for motions
12/05/2008	Corey, Barbara	0.80	Motions
12/12/2008	Corey, Barbara	0.40	TC w/client; Ms. Cook
12/15/2008	Corey, Barbara	0.50	Court appearance
12/17/2008	Corey, Barbara	0.40	TC w/Ms. Cook; bail hearing
12/18/2008	Corey, Barbara	0.50	Discussion w/DPA re evidentiary issues
01/05/2009	Corey, Barbara	0.90	Preparation for interview
01/09/2009	Corey, Barbara	1.30	Bail hearing
01/16/2009	Corey, Barbara	0.50	TC X3 w/prosecutor
01/19/2009	Corey, Barbara	0.50	TC w/investigator and Ms. Cook
01/20/2009	Corey, Barbara	0.70	Court appearance
01/23/2009	Corey, Barbara	0.60	Interview of witness
01/27/2009	Corey, Barbara	2.10	E-mails w/DPA; response to motions
02/05/2009	Corey, Barbara	2.60	Briefing
02/08/2009	Corey, Barbara	1.10	Briefing
02/09/2009	Corey, Barbara	0.30	Court appearance
02/25/2009	Corey, Barbara	0.50	TC w/Ms. Cook, Bob Crowe
03/17/2009	Corey, Barbara	0.50	Court appearance
04/29/2009	Corey, Barbara	0.50	E-mails w/court and prosecutor re case assignment
05/29/2009	Corey, Barbara	1.20	Court appearance
06/03/2009	Corey, Barbara	0.80	Court appearance; preparation
06/15/2009	Corey, Barbara	0.40	Court appearance
07/13/2009	Corey, Barbara	0.30	Court appearance
07/27/2009	Corey, Barbara	0.80	Court appearance
07/30/2009	Corey, Barbara	6.70	Jury selection
07/31/2009	Corey, Barbara	3.40	Interviews of witnesses
08/07/2009	Corey, Barbara	1.20	Marked exhibits for trial
09/01/2009	Corey, Barbara	0.40	Review of video arraignment of Marcy
09/04/2009	Corey, Barbara	1.20	Interview of WSP Crime Lab employee
09/15/2009	Corey, Barbara	7.10	Trial day; witness interviews
09/16/2009	Corey, Barbara	8.30	Trial day and preparation
09/17/2009	Corey, Barbara	8.50	Trial day and preparation
09/21/2009	Corey, Barbara	8.20	Trial day and preparation
09/22/2009	Corey, Barbara	8.40	Trial day and preparation
09/23/2009	Corey, Barbara	8.40	Trial day and preparation
09/25/2009	Corey, Barbara	1.70	Visit to crime scene; preparation
09/28/2009	Corey, Barbara	7.70	Trial day and preparation
09/29/2009	Corey, Barbara	2.70	Preparation
09/30/2009	Corey, Barbara	9.20	Trial day and preparation
10/01/2009	Corey, Barbara	8.60	Trial day and preparation
10/02/2009	Corey, Barbara	1.10	Preparation
10/08/2009	Corey, Barbara	7.90	Trial day and preparation
10/09/2009	Corey, Barbara	1.20	Reviewed evidence for closing
10/12/2009	Corey, Barbara	8.30	Trial day and preparation
10/13/2009	Corey, Barbara	7.10	Jury instructions and closing
10/14/2009	Corey, Barbara	9.40	Trial day and preparation
10/20/2009	Corey, Barbara	0.90	TC w/court re jury question
10/23/2009	Corey, Barbara	0.70	Jury question
10/26/2009	Corey, Barbara	3.20	Jury verdict, meeting w/jurors, post-verdict work
11/03/2009	Corey, Barbara	2.10	Motion for new trial; tc w/investigator

**Barbara Corey, Attorney at Law**  
**Time by Job Detail**  
**All Transactions**

<u>Date</u>	<u>Name</u>	<u>Duration</u>	<u>Notes</u>
11/04/2009	Corey, Barbara	1.10	Jail visit with client
11/12/2009	Corey, Barbara	1.40	Worked on new trial motion
12/11/2009	Corey, Barbara	1.10	Hearing
12/22/2009	Corey, Barbara	0.50	Jail visit w/client
01/06/2010	Corey, Barbara	0.80	Scheduling
03/08/2010	Corey, Barbara	2.40	Preparation of motion
05/03/2010	Corey, Barbara	3.20	Post-trial motions
Total Payment for Expertise:Criminal		827.05	
<b>Payment for Expertise:Trial Day</b>			
08/06/2007	Corey, Barbara	9.10	Trial day
08/07/2007	Corey, Barbara	6.30	1/2 Trial day
08/08/2007	Corey, Barbara	8.90	Trial day and preparation
08/09/2007	Corey, Barbara	9.10	Full trial day
07/28/2009	Corey, Barbara	3.10	Jury selection
07/29/2009	Corey, Barbara	6.30	Jury selection
08/03/2009	Corey, Barbara	6.60	Jury selection
08/04/2009	Corey, Barbara	6.70	Trial day and preparation
08/05/2009	Corey, Barbara	6.30	Jury selection
08/06/2009	Corey, Barbara	5.60	Trial day and preparation
08/10/2009	Corey, Barbara	8.60	Trial day
08/11/2009	Corey, Barbara	8.80	Trial day
08/12/2009	Corey, Barbara	9.10	Trial day and preparation
08/13/2009	Corey, Barbara	8.80	Trial day and preparation
08/17/2009	Corey, Barbara	4.60	1/2 Trial day and preparation
08/18/2009	Corey, Barbara	7.70	Trial day and preparation
08/19/2009	Corey, Barbara	7.80	Trial day and preparation
08/20/2009	Corey, Barbara	8.20	Trial day and preparation
08/24/2009	Corey, Barbara	8.70	Trial day and preparation
08/25/2009	Corey, Barbara	8.80	Trial day and preparation
08/31/2009	Corey, Barbara	8.10	Trial day and preparation
09/08/2009	Corey, Barbara	8.30	Trial day and preparation
09/09/2009	Corey, Barbara	9.20	Trial day and preparation
09/14/2009	Corey, Barbara	7.10	Trial day and witness interviews
Total Payment for Expertise:Trial Day		181.80	
Total Criminal (Private)/Barbara:Garland, Ra...		1017.15	
<b>TOTAL</b>		<b>1017.15</b>	



**C & C LEGAL INVESTIGATIONS, INC**

7 ST. HELENS SUITE #2  
 TACOMA, WA 98402  
 Phone (253) 572-6194  
 Fax (253) 572-6216

*IPaid w/ ch# 674*

**Invoice**

Margaret Cook  
 9313 217th St. Ct. E  
 Graham, WA 98338  
 Re: Garland

DATE 9/8/2005 INVOICE # 2900

*[Handwritten signature and scribbles]*

TERMS CASE NUMBER  
 25-092 Garland

SERVICE DATE	DESCRIPTION	QTY/HOURS	RATE	AMOUNT
8/4/2005	Reviewed Discovery	1	55.00	55.00
8/4/2005	phone call/conversation with other investigator "Rob"	0.4	55.00	22.00
8/5/2005	phone call/conversation w/Margaret	0.2	55.00	11.00
8/6/2005	Drove to 144th st. to locate witness	1.3	55.00	71.50
8/7/2005	Drove to 144th st. to locate witness	1	55.00	55.00
8/8/2005	Recieved call from atty office	0.4	55.00	22.00
8/8/2005	Recieved and reviewed reports	1.3	55.00	71.50
8/9/2005	Attempted contact with witness	0.7	55.00	38.50
8/9/2005	Computer search to locate witness	0.8	55.00	44.00
8/10/2005	Drove to 144th st.-interviewed witness and phone call w/atty	1.5	55.00	82.50
8/10/2005	Recieved msg. from Margaret Cook	0.2	55.00	11.00
8/10/2005	Returned call to Clients Mother	0.2	55.00	11.00
8/10/2005	left msg. for Dep. Pros.	0.3	55.00	16.50
8/10/2005	Phone Conversation w/Dep. Pros.	0.4	55.00	22.00
8/10/2005	Phone conversation w/Atty Secretary	0.3	55.00	16.50
8/10/2005	Research w/gun expert	0.5	55.00	27.50
8/11/2005	Viewed interior surveillance tapes	2	55.00	110.00
8/11/2005	Phone call/discussion w/Margaret	0.3	55.00	16.50
8/12/2005	Attended court hearing-meet temp attorney	1.5	55.00	82.50
8/12/2005	Drove to Spanaway to contact witness	1	55.00	55.00
8/17/2005	Phone msg. from Margaret	0.2	55.00	11.00
8/17/2005	Phone call from Margaret	0.3	55.00	16.50
8/17/2005	Called left msg. for Jail Duty Sgt.	0.2	55.00	11.00
8/17/2005	Write e-mail to DPA Steve Penner	0.5	55.00	27.50
8/18/2005	Phone msg. from Margaret	0.2	55.00	11.00
8/18/2005	Went to jail and met w/Def.	1.5	55.00	82.50

fax # 91-2088939

**Total**

# C & C LEGAL INVESTIGATIONS, INC

7 ST. HELENS SUITE #2  
TACOMA, WA 98402  
Phone (253) 572-6194  
Fax (253) 572-6216

## Invoice

Margaret Cook  
9313 217th St. Ct. E  
Graham, WA 98338  
Re: Garland

DATE                      INVOICE #  
9/8/2005                      2900

TERMS                      CASE NUMBER  
  
25-092 Garland

SERVICE DATE	DESCRIPTION	QTY/HOURS	RATE	AMOUNT
8/18/2005	Called Margaret	0.3	55.00	16.50
8/18/2005	2 more phone conversations w/Margaret	0.3	55.00	16.50
8/22/2005	Interview w/Detective Portman	0.4	55.00	22.00
8/23/2005	Phone call to Atty office	0.2	55.00	11.00
8/23/2005	Left msg. for Craig Stewart	0.2	55.00	11.00
8/24/2005	Phone call from Margaret	0.2	55.00	11.00
8/24/2005	E-mailed memo to Atty	1	55.00	55.00
8/24/2005	Reviewed Recovery	0.3	55.00	16.50
8/24/2005	Sent e-mail to DPA Penner	0.3	55.00	16.50
8/29/2005	Phone conversation w/Atty	0.3	55.00	16.50
8/29/2005	Sent e-mail to DPA Penner	0.2	55.00	11.00
8/30/2005	Phone call from Margaret	0.2	55.00	11.00
8/30/2005	Sent e-mail to DPA Penner	0.2	55.00	11.00
8/31/2005	Went to Atty office	0.3	55.00	16.50
8/31/2005	Review all bullet information in discovery	0.6	55.00	33.00

Fax # 91-2088939

**Total**                      **\$1,276.00**

# C & C LEGAL INVESTIGATIONS, INC

7 ST. HELENS SUITE #2  
TACOMA, WA 98402  
Phone (253) 572-6194  
Fax (253) 572-6216

## Invoice

Margaret Cook  
9313 217th St. Ct. E  
Graham, WA 98338

DATE INVOICE #  
11/28/2005 2956

TERMS CASE NUMBER  
25-092 Garland

SERVICE DATE	DESCRIPTION	QTY/HOURS	RATE	AMOUNT
9/6/2005	Phone msg. from Margaret-returned phone call and left msg.	0.3	55.00	16.50
9/6/2005	Called Craig Stewart and left msg.	0.2	55.00	11.00
9/6/2005	Phone call from/discussion with Margaret	0.3	55.00	16.50
9/8/2005	Phone msg. from attorney secretary/called and talked to her	0.2	55.00	11.00
9/8/2005	Picked up additional discovery from attorney	0.4	55.00	22.00
9/8/2005	Phone call from Margaret	0.2	55.00	11.00
9/8/2005	Reviewed additional 222 pages of discovery	2	55.00	110.00
9/9/2005	Meeting with Margaret and attorney at his office	1.5	55.00	82.50
9/12/2005	Phone discussion with Margaret	0.4	55.00	22.00
9/12/2005	Meeting with Rob Ritchie	1	55.00	55.00
9/13/2005	Phone discussion with Margaret	0.3	55.00	16.50
9/13/2005	Phone call from Rob Ritchie	0.2	55.00	11.00
9/13/2005	Phone conversation with Barbara Corey	0.2	55.00	11.00
9/13/2005	Phone discussion with Rob Ritchie	0.3	55.00	16.50
9/16/2005	Went to Berneburg's office and picked up all discovery-gave it to Barbara Corey	0.7	55.00	38.50
9/16/2005	Phone discussion with Rob	0.2	55.00	11.00
9/17/2005	Phone calls from/to Rob. Gave him vehicle license information	0.3	55.00	16.50
9/20/2005	Phone call from Rob	0.2	55.00	11.00
9/21/2005	Phone call from Margaret	0.2	55.00	11.00
9/21/2005	Printed up my e-mails to Bernburg and prosecutor for Barbara Corey	0.2	55.00	11.00
9/22/2005	Phone conversation with Margaret	0.2	55.00	11.00
9/29/2005	Phone conversation with Margaret, re:subpoena for news video	0.2	55.00	11.00

**Total**

# C & C LEGAL INVESTIGATIONS, INC

7 ST. HELENS SUITE #2  
TACOMA, WA 98402  
Phone (253) 572-6194  
Fax (253) 572-6216

## Invoice

Margaret Cook  
9313 217th St. Ct. E  
Graham, WA 98338

DATE                      INVOICE #  
11/28/2005                      2956

TERMS                      CASE NUMBER  
  
25-092 Garland

SERVICE DATE	DESCRIPTION	QTY/HOURS	RATE	AMOUNT
9/30/2005	Wrote up Natyavia Stewart interview	1	55.00	55.00
10/4/2005	Phone call from/conversation with Margaret	0.2	55.00	11.00
10/5/2005	Discussed case with attorney Corey at her office	0.4	55.00	22.00
10/6/2005	Recieved Phone msg. from Det. Heishman	0.2	55.00	11.00
10/11/2005	Phone call from and discussion with Det. Heishman	0.5	55.00	27.50
10/13/2005	Msg. from Margaret-returned call and left msg.	0.3	55.00	16.50
10/17/2005	Went to jail with Barbara-visited client	1.2	55.00	66.00
10/18/2005	Research on discovery	1.5	55.00	82.50
11/1/2005	Discussion with attorney	0.3	55.00	16.50
11/16/2005	Phone discussion with Rob Ritchie	0.3	55.00	16.50
11/18/2005	Phone discussion with Rob Ritchie	0.2	55.00	11.00
11/20/2005	Meeting with Rob Ritchie in Tacoma	1.2	55.00	66.00
11/22/2005	Phone call from Rob Ritchie	0.3	55.00	16.50
11/25/2005	Phone msg. from attorney	0.2	55.00	11.00
11/25/2005	Phone discussion with Rob Ritchie	0.3	55.00	16.50
11/26/2005	Phone discussion with attorney	0.3	55.00	16.50
11/26/2005	Phone discussion with Margaret	0.2	55.00	11.00
11/28/2005	Phone discussion with attorney	0.2	55.00	11.00
11/29/2005	Called Robert Ritchie	0.2	55.00	11.00

**Total**                      **\$1,028.50**

# C & C LEGAL INVESTIGATIONS, INC

7 ST. HELENS SUITE #2  
TACOMA, WA 98402  
Phone (253) 572-6194  
Fax (253) 572-6216

## Invoice

Margaret Cook  
9313 217th St. Ct. E  
Graham, WA 98338

DATE INVOICE #  
4/4/2006 3068

TERMS CASE NUMBER  
25-092 Garland

SERVICE DATE	DESCRIPTION	QTY/HOURS	RATE	AMOUNT
12/5/2005	Phone call from attorney	0.2	55.00	11.00
12/5/2005	Went to jail with attorney and visited defendant	1.4	55.00	77.00
12/6/2005	Sent e-mail to Rob Ritchie	0.3	55.00	16.50
12/7/2005	Phone conversation with investigator Lea Sanders	0.2	55.00	11.00
12/8/2005	Phone call from Margaret	0.2	55.00	11.00
12/12/2005	Phone conversation with Margaret	0.2	55.00	11.00
12/19/2005	Met with Rob Ritchie	1.3	55.00	71.50
12/20/2005	Phone call from attorney	0.2	55.00	11.00
12/22/2005	Phone conversation with Margaret	0.2	55.00	11.00
1/12/2006	Conversation with attorney	0.2	55.00	11.00
1/22/2006	Msg. from attorney on police interviews	0.2	55.00	11.00
1/29/2006	E-mail from attorney/answered e-mail	0.2	55.00	11.00
2/1/2006	Went to attorney's office-discussed police interviews	0.3	55.00	16.50
2/2/2006	E-mail from attorney regarding prosecutor setting up interviews	0.2	55.00	11.00
2/6/2006	Phone call from attorney. Called Margaret and set up stenographer for Feb. 7th	0.4	55.00	22.00
2/7/2006	Phone call from attorney	0.2	55.00	11.00
2/7/2006	Interview of jail superintendent Eileen Bisson at prosecutors office	1.5	55.00	82.50
2/7/2006	Reviewed def. Heishman's internal affairs complaint form	0.3	55.00	16.50
2/7/2006	Recieved and reviewed fax from Eileen Bisson	0.2	55.00	11.00
2/8/2006	Went to CC building to interview sheriff-cancelled	0.5	55.00	27.50
2/8/2006	Met with attorney	0.3	55.00	16.50
2/8/2006	Called Dep prosecutor to schedule interview of Dep. Jason Smith and to inspect bullet at property room	0.2	55.00	11.00

Tax # 91-2088939

**Total**

# C & C LEGAL INVESTIGATIONS, INC

7 ST. HELENS SUITE #2  
TACOMA, WA 98402  
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Fax (253) 572-6216

## Invoice

Margaret Cook  
9313 217th St. Ct. E  
Graham, WA 98338

DATE INVOICE #  
4/4/2006 3068

TERMS CASE NUMBER  
25-092 Garland

SERVICE DATE	DESCRIPTION	QTY/HOURS	RATE	AMOUNT
2/11/2006	Recieved E-mail from attorney	0.2	55.00	11.00
2/13/2006	Interviewed Paul Pastor, Bruce Larson, and Ed Troyer	3	55.00	165.00
2/15/2006	Had deputy sheriff review both television video tapes	0.5	55.00	27.50
2/15/2006	Phone conversation with attorney	0.2	55.00	11.00
2/16/2006	Phone call from Margaret	0.3	55.00	16.50
2/16/2006	Phone conversation with attorney	0.2	55.00	11.00
2/17/2006	Phone call from attorney	0.2	55.00	11.00
2/17/2006	Called and advised Margaret	0.3	55.00	16.50
2/22/2006	Went to pros. office then to property room to view bullet from Explorer	1.5	55.00	82.50
2/22/2006	Phone conversation with Margaret	0.2	55.00	11.00
2/23/2006	Phone call from Margaret	0.2	55.00	11.00
2/23/2006	Called def. at jail	0.4	55.00	22.00
2/23/2006	Phone conversation with attorney	0.2	55.00	11.00
2/24/2006	Interviews of Dep. Jason Smith and Dep. Jerry Johnson at pros. office	2	55.00	110.00
2/24/2006	Phone conversation with Margaret	0.2	55.00	11.00
3/3/2006	Phone call from Margaret	0.2	55.00	11.00
3/3/2006	Checked possible conference room for interviews	0.3	55.00	16.50
3/4/2006	Called Margaret	0.2	55.00	11.00
3/15/2006	Spoke to Barbara about trial dates	0.2	55.00	11.00
3/19/2006	E-mail from Barbara-Ray was in a fight	0.2	55.00	11.00
3/20/2006	Jerry went to jail and checked on Ray	1	55.00	55.00
3/24/2006	Called Ray at jail and talked to him about case	0.4	55.00	22.00
3/29/2006	Went to jail with attorney and contacted client	1.2	55.00	66.00

Fax # 91-2088939

**Total**

# C & C LEGAL INVESTIGATIONS, INC

7 ST. HELENS SUITE #2  
TACOMA, WA 98402  
Phone (253) 572-6194  
Fax (253) 572-6216

## Invoice

Margaret Cook  
9313 217th St. Ct. E  
Graham, WA 98338

DATE INVOICE #  
4/4/2006 3068

TERMS CASE NUMBER  
25-092 Garland

SERVICE DATE	DESCRIPTION	QTY/HOURS	RATE	AMOUNT
3/31/2006	Went to mall-served subpoena to Sheri Portrait Studio-filled out Dec. of service-dropped off to attorney	1	55.00	55.00
4/3/2006	Phone call from attorney-went and picked up Shawna Blatnik's work records from attorney.	0.4	55.00	22.00

Tax # 91-2088939

**Total**

**\$1,298.00**

# C & C LEGAL INVESTIGATIONS, INC

7 ST. HELENS SUITE #2  
TACOMA, WA 98402  
Phone (253) 572-6194  
Fax (253) 572-6216

Green @ MSN.COM

## Invoice

Margaret Cook  
9313 217th St. Ct. E  
Graham, WA 98338

DATE INVOICE #  
8/11/2006 3190

TERMS CASE NUMBER  
Due on receipt 25-092 Garland

SERVICE DATE	DESCRIPTION	QTY/HOURS	RATE	AMOUNT
4/10/2006	Phone Call From Margaret	0.2	55.00	11.00
4/12/2006	Phone Call From Rob Ritchie	0.2	55.00	11.00
4/13/2006	Phone Call From Rob Ritchie And Attorney	0.3	55.00	16.50
4/13/2006	Left Phone Message For Payroll Person (Blatnik)	0.2	55.00	11.00
4/13/2006	Meeting With Rob Ritchie And Attorney	1.3	55.00	71.50
4/14/2006	Meeting With Rob Ritchie	0.3	55.00	16.50
4/15/2006	Phone Call From Margaret	0.2	55.00	11.00
4/17/2006	Research Autopsy Report And Photos	0.4	55.00	22.00
4/17/2006	Phone Discussion With Attorney	0.3	55.00	16.50
4/24/2006	Email From Barbara Corey/Phone Call From Barbara/Phone Call From Margaret/Email Reports From Rob Ritchie	0.5	55.00	27.50
6/14/2006	Email From Attorney	0.2	55.00	11.00
6/15/2006	Discussion At Attorney's Office	0.4	55.00	22.00
6/19/2006	Phone Call From Margaret	0.2	55.00	11.00
6/20/2006	Email From Attorney	0.2	55.00	11.00
6/21/2006	Meeting With Attorney	1	55.00	55.00
6/21/2006	Wrote Up Report Clarifying Shawna Blatnik's Time-Sheet Entries	0.6	55.00	33.00
6/21/2006	Researched reports and wrote Up Proposed Police Officer interview Lists	2	55.00	110.00
7/25/2006	Email From Attorney	0.2	55.00	11.00
7/26/2006	Phone Call From Margaret- Discussion	0.3	55.00	16.50
7/27/2006	Phone Call From Attorney	0.2	55.00	11.00
7/27/2006	Wrote Memo To Dep. Prosecutor Penner	1	55.00	55.00
7/29/2006	Emails Clarification To DPA Penner On Interview	0.3	55.00	16.50
7/30/2006	Discussion With Attorney On Scheduling	0.2	55.00	11.00

**Total**

fax # 91-2088939

# C & C LEGAL INVESTIGATIONS, INC

7 ST. HELENS SUITE #2  
TACOMA, WA 98402  
Phone (253) 572-6194  
Fax (253) 572-6216

## Invoice

Margaret Cook  
9313 217th St. Ct. E  
Graham, WA 98338

DATE INVOICE #  
8/11/2006 3190

TERMS CASE NUMBER  
Due on receipt 25-092 Garland

SERVICE DATE	DESCRIPTION	QTY/HOURS	RATE	AMOUNT
8/1/2006	Email From (And Back To) Attorney, Confirming Appointment	0.2	55.00	11.00
8/3/2006	Viewed Evidence At Property Room With Attorney	1.8	55.00	99.00
8/5/2006	Phone Call From Margaret	0.2	55.00	11.00
8/6/2006	Preparation For Officer Interviews (08/07/2006)	1.5	55.00	82.50
8/7/2006	Officer Interviews (\$15.00 Refreshments)	2.5	55.00	137.50
8/7/2006	Phone Call From Margaret	0.3	55.00	16.50
8/7/2006	Preparation For Interviews (08/08/2006)	1.5	55.00	82.50
8/8/2006	Officer Interviews ((\$15.00 Refreshments)	2.5	55.00	137.50
8/8/2006	Phone Call To Margaret	0.3	55.00	16.50
8/8/2006	Preparation For Interviews (08/09/2006)	4	55.00	220.00
8/9/2006	Officer Interviews (\$15.00 Refreshments)	3	55.00	165.00
8/9/2006	Phone Call To Margaret	0.4	55.00	22.00
8/10/2006	Went To County-City Building To View Evidence. Detective cancelled	1	55.00	55.00
8/10/2006	Phone Conversation With Margaret	0.2	55.00	11.00
8/10/2006	Email to prosecutor listing witnesses	0.3	55.00	16.50
8/11/2006	Phone conversation with Forensic Pathologist Clifford Nelson	0.3	55.00	16.50
8/11/2006	Left phone message for Forensic Scientist Matthew Noedel He called back and we had conversation	0.5	55.00	27.50
8/12/2006	Went to the jail and briefed client	1.5	55.00	82.50
8/12/2006	Conference with Firearms expert Isaac Adams regarding bullets	1.6	55.00	88.00
8/14/2006	Phone conversation with attorney setting up visit to Margaret's residence	0.2	55.00	11.00
8/15/2006	Phone call to Margaret	0.2	55.00	11.00

fax # 91-2088939

**Total**

# C & C LEGAL INVESTIGATIONS, INC

7 ST. HELENS SUITE #2  
TACOMA, WA 98402  
Phone (253) 572-6194  
Fax (253) 572-6216

## Invoice

Margaret Cook  
9313 217th St. Ct. E  
Graham, WA 98338

DATE INVOICE #  
8/11/2006 3190

TERMS CASE NUMBER  
Due on receipt 25-092 Garland

SERVICE DATE	DESCRIPTION	QTY/HOURS	RATE	AMOUNT
8/16/2006	Drove to Margaret's residence with Barbara Corey Took photos and measurements (48 miles)	2.2	55.00	121.00
8/17/2006	Received email from Noedel I wrote and emailed memo to him outlining services requested	0.8	55.00	44.00
8/17/2006	Prepared for officer interviews (8/18/06)	2.5	55.00	137.50
8/18/2006	Officer interviews (:00-1`2:00 and 2:30-4:00 (refreshments \$22.00)	4.5	55.00	247.50
8/18/2006	Email from /and returned email to Noedel	0.3	55.00	16.50
8/18/2006	Made 3 copies each of 2 Medical Examiner photo disks (crime scene and autopsy)	1.2	55.00	66.00
8/18/2006	Reviewed photos on computer to isolate photos we want Forensic Pathologist to take close look at	0.4	55.00	22.00
8/18/2006	Phone call from/conversation with Margaret regarding interviews	0.2	55.00	11.00
8/19/2006	Phone discussion with Margaret regarding Forensic Scientist	0.2	55.00	11.00
8/19/2006	Left phone message for attorney regarding Forensic Scientist	0.2	55.00	11.00
	Client Reimbursable Costs (interview refreshments)		67.00	67.00
	Total Mileage 48 miles	48	0.50	24.00

fax # 91-2088939

**Total** \$2,687.00

# C & C LEGAL INVESTIGATIONS, INC

7 ST. HELENS SUITE #2  
TACOMA, WA 98402  
Phone (253) 572-6194  
Fax (253) 572-6216

## Invoice

Margaret Cook  
9313 217th St. Ct. E  
Graham, WA 98338  
Re: Garland, Ray

DATE INVOICE #  
9/30/2006 3228

TERMS CASE NUMBER  
Due on receipt 25-092 Garland

SERVICE DATE	DESCRIPTION	QTY/HOURS	RATE	AMOUNT
8/21/2006	Emails To And From Matt Noedel	0.3	55.00	16.50
8/21/2006	Email From Attorney; Left Phone Message For Forensic Scientist	0.3	55.00	16.50
8/22/2006	Phone Message From Margaret; Called Back And Left Message	0.2	55.00	11.00
8/23/2006	Went To Property Room; Finished Viewing Evidence; Found Some Evidence For Forensic Scientists	1.2	55.00	66.00
8/23/2006	Received Email And Retainer From Mike Howard. Signed And Mailed Copy To Margaret And Original To Howard	0.7	55.00	38.50
8/23/2006	Called And Talked To Margaret	0.2	55.00	11.00
8/25/2006	Two Officer Interviews At Attorney's Office	2	55.00	110.00
9/1/2006	Two Officer Interviews At Attorney's Office	2.2	55.00	121.00
9/1/2006	Obtained New Court Order. Went To Property Room And Obtained Two Large Boxes Of Evidence. Inventoried And Took Boxes And Mailed To Forensic Scientist Howard By UPS	3	55.00	165.00
9/4/2006	Email From/Answered Attorney	0.2	55.00	11.00
9/5/2006	Printed Off Interviews Of Four Officers	1	55.00	55.00
9/6/2006	Assembled Interviews And Police Reports Of Each Officer In Binder To Show Client	0.5	55.00	27.50
9/6/2006	Phone Message From Mike Howard, Forensic Specialist	0.2	55.00	11.00
9/6/2006	Phone Conference With Mike Howard	0.6	55.00	33.00
9/6/2006	Wrote Requests/ Memos To Forensic Scientist And M.E. Expert	2.5	55.00	137.50

Tax # 91-2088939

**Total**

# C & C LEGAL INVESTIGATIONS, INC

7 ST. HELENS SUITE #2  
TACOMA, WA 98402  
Phone (253) 572-6194  
Fax (253) 572-6216

## Invoice

Margaret Cook  
9313 217th St. Ct. E  
Graham, WA 98338  
Re: Garland, Ray

DATE INVOICE #  
9/30/2006 3228

TERMS CASE NUMBER  
Due on receipt 25-092 Garland

SERVICE DATE	DESCRIPTION	QTY/HOURS	RATE	AMOUNT
9/6/2006	Met And Briefed Isaac Adams; Gave Him Interviews To Show Client In Jail	0.8	55.00	44.00
9/8/2006	Received Email From Pros. Office On Interviews - Replied	0.3	55.00	16.50
9/8/2006	Wrote Email Memo To M.E. Expert, Dr. Clifford Nelson Explaining Request	1	55.00	55.00
9/8/2006	Received Reply	0.3	55.00	16.50
9/8/2006	Went And Made Blow Up Prints Showing Brocks Hand	0.6	55.00	33.00
9/9/2006	Made Copy Of Autopsy Report And Two M.E. Photo Disks And Mailed To Nelson	1	55.00	55.00
9/9/2006	Prepared Witness List And Emailed Again To Pros. Office	0.3	55.00	16.50
9/9/2006	Received Phone Message From Attorney	0.2	55.00	11.00
9/9/2006	Received Email From Attorney	0.2	55.00	11.00
9/11/2006	Received Phone Message From Margaret	0.3	55.00	16.50
9/12/2006	Phone Call From Attorney	0.2	55.00	11.00
9/12/2006	Interviews At CC Building	2.3	55.00	126.50
9/12/2006	Phone Call To Margaret	0.2	55.00	11.00
9/12/2006	Printed And Arranged Transcripts And Discoveries	0.6	55.00	33.00
9/12/2006	Delivered Material To Isaac To Take To Show Ray	0.8	55.00	44.00
9/15/2006	Received Emails Regarding Monday Interview	0.2	55.00	11.00
9/17/2006	Put Together Materials To Prepare For Interviews	0.8	55.00	44.00
9/18/2006	Phone Call From Attorney	0.2	55.00	11.00
9/18/2006	I Called Court Reporter	0.2	55.00	11.00
9/18/2006	Morning Interviews At Court Reporter's Office (Karlтин Marcy Didn't Show)	1	55.00	55.00

Tax # 91-2088939

**Total**

# C & C LEGAL INVESTIGATIONS, INC

7 ST. HELENS SUITE #2  
TACOMA, WA 98402  
Phone (253) 572-6194  
Fax (253) 572-6216

## Invoice

Margaret Cook  
9313 217th St. Ct. E  
Graham, WA 98338  
Re: Garland, Ray

DATE INVOICE #  
9/30/2006 3228

TERMS CASE NUMBER  
Due on receipt 25-092 Garland

SERVICE DATE	DESCRIPTION	QTY/HOURS	RATE	AMOUNT
9/18/2006	Afternoon Interviews/ John Ringer Interview (Mandy Joyner And Natalie Stewart Didn't Show)	1	55.00	55.00
9/18/2006	I Called And Talked To Margaret	0.2	55.00	11.00
9/19/2006	Printed Out And Reviewed Six Witness Interview Transcripts	0.8	55.00	44.00
9/19/2006	Email From Attorney	0.2	55.00	11.00
9/19/2006	Sent Email To Pros. Office	0.2	55.00	11.00
9/19/2006	Phone Call To Mandy Joyner- Says She Will Be Coming In Thursday 10:00am	0.2	55.00	11.00
9/20/2006	Served Order For Deposition Of Karltin Marcy To Attorney Jeff Gross' Secretary Sandra Smith At 10:45am	0.5	55.00	27.50
9/20/2006	Drove To Spanaway And Served Order For Deposition	1	55.00	55.00
9/20/2006	Phone Call From Margaret Re: Clower Contacting His Client	0.3	55.00	16.50
9/20/2006	Email From Pros. Office Regarding Interview Schedule	0.2	55.00	11.00
9/21/2006	Prepared For Nyataria Stewart Interview	0.5	55.00	27.50
9/21/2006	Went To Stewart Interview	1.2	55.00	66.00
9/21/2006	Phone Conversation With Margaret	0.3	55.00	16.50
9/21/2006	Computer Search On Karltin Marcy	0.5	55.00	27.50
9/21/2006	Criminal History On Karltin Marcy From WSP	0.5	55.00	27.50
9/21/2006	Email From Prosecutor On Interviews	0.2	55.00	11.00
9/21/2006	Phone Message From Expert Witness Mike Howard	0.2	55.00	11.00
9/21/2006	Called Mike Howard Regarding Evidence	0.3	55.00	16.50

Tax # 91-2088939

**Total**

# C & C LEGAL INVESTIGATIONS, INC

7 ST. HELENS SUITE #2  
TACOMA, WA 98402  
Phone (253) 572-6194  
Fax (253) 572-6216

## Invoice

Margaret Cook  
9313 217th St. Ct. E  
Graham, WA 98338  
Re: Garland, Ray

DATE                      INVOICE #  
9/30/2006                      3228

TERMS                      CASE NUMBER  
Due on receipt                      25-092 Garland

SERVICE DATE	DESCRIPTION	QTY/HOURS	RATE	AMOUNT
9/22/2006	Copied All Bullet Information And Took To Post Office. Overnight Mailed To Mike Howard. Postage \$27.29	1	55.00	55.00
9/23/2006	Checked Autopsy Photos And Crime Scene Photos- Wrote And Sent Email To Mike Howard	1.3	55.00	71.50
9/24/2006	Reviewed Material For Interview On 9/25	1.5	55.00	82.50
9/25/2006	Morning Interviews With Mandy Joyner And Todd Karr	2	55.00	110.00
9/25/2006	Afternoon Interview With Tim Valentine	1.5	55.00	82.50
9/25/2006	Phone Discussion With Margaret	0.3	55.00	16.50
9/25/2006	Preparations For Interviews On 9/26	0.5	55.00	27.50
9/26/2006	Interviews At Court Reporter's Office 9:00-12:30. Phone Discussion With Margaret	3.5	55.00	192.50
9/26/2006	Computer Research To Locate JJ McMurrian	1.3	55.00	71.50
9/27/2006	Interview At Court Reporter's Office	1.2	55.00	66.00
9/27/2006	Phone Discussion With Margaret	0.2	55.00	11.00
9/28/2006	Phone Discussion With Attorney/ Phone Discussion With Forensic Scientist	0.4	55.00	22.00
9/29/2006	Phone Message From Attorney	0.2	55.00	11.00
9/30/2006	Preparation For Lisa Loggins, Lisa Lambert, Karltin Marcy And Shelly Dominick Interviews	2	55.00	110.00
9/30/2006	Met With Isaac Adams And Picked Up Items From Defendant	0.5	55.00	27.50
9/9/2006	Isaac Met With Defendant	3.4	35.00	119.00
9/17/2006	Isaac Met With Defendant	3.1	35.00	108.50
9/29/2006	Isaac Met With Defendant	3.1	35.00	108.50

Tax # 91-2088939

**Total**

# C & C LEGAL INVESTIGATIONS, INC

7 ST. HELENS SUITE #2  
TACOMA, WA 98402  
Phone (253) 572-6194  
Fax (253) 572-6216

## Invoice

Margaret Cook  
9313 217th St. Ct. E  
Graham, WA 98338  
Re: Garland, Ray

DATE INVOICE #  
9/30/2006 3228

TERMS CASE NUMBER  
Due on receipt 25-092 Garland

SERVICE DATE	DESCRIPTION	QTY/HOURS	RATE	AMOUNT
9/30/2006	Isaac Delivered Materials From Defendant And Met With Bob	0.5	35.00	17.50
9/1/2006	Postage	1	19.75	19.75
9/22/2006	Overnight Postage	1	27.29	27.29

Tax # 91-2088939

**Total** \$3,277.04

# C & C LEGAL INVESTIGATIONS, INC

7 ST. HELENS SUITE #2  
TACOMA, WA 98402  
Phone (253) 572-6194  
Fax (253) 572-6216

## Invoice

Margaret Cook  
9313 217th St. Ct. E  
Graham, WA 98338  
Re: Garland, Ray

DATE                      INVOICE #  
10/30/2006                3257

TERMS                      CASE NUMBER  
Due on receipt            25-092 Garland

SERVICE DATE	DESCRIPTION	QTY/HOURS	RATE	AMOUNT
10/1/2006	Prepared for interviews	3.5	55.00	192.50
10/2/2006	Interview of Shelly Dominick	1.7	55.00	93.50
10/2/2006	Drove to Belinda Wirtz house at 1620 So. 111th. She refused interview. 20 miles	0.8	55.00	44.00
10/2/2006	Phone discussion with Margaret	0.9	55.00	49.50
10/7/2006	Printed up 15 witness interviews and put into binders. Gave to Isaac to show to client.	1.6	55.00	88.00
10/9/2006	Ph. call from attorney. Went to her office and picked up order for deposition. Drove to Belinda Wirtz residence and served her. 20 miles	1.2	55.00	66.00
10/9/2006	Prepared for Lisa Loggins and Belinda Wirtz interviews.	0.9	55.00	49.50
10/10/2006	Interviews of Lisa Loggins and Belinda Wirtz.	2	55.00	110.00
10/10/2006	Research of addresses for JJ McMurrian.	0.7	55.00	38.50
10/10/2006	Went to jail and met with client.	1	55.00	55.00
10/11/2006	Ph. conversation with Margaret.	0.3	55.00	16.50
10/12/2006	Phone call from Mrgaret.	0.2	55.00	11.00
10/12/2006	Phone conference with Rob Ritchie re: McMurrian.	0.6	55.00	33.00
10/12/2006	Reviewed documentation on McMurrian.	0.3	55.00	16.50
10/13/2006	Sent email to attorney.	0.2	55.00	11.00
10/13/2006	Called and left ph. message for attorney	0.2	55.00	11.00
10/13/2006	Called McMurrian's mother in Strong, AR. Left 2 messages.	0.3	55.00	16.50
10/14/2006	Ph. message and email from Margaret. Email from attorney.	0.3	55.00	16.50
10/14/2006	Called and left msg. for McMurrian's mother	0.2	55.00	11.00
10/16/2006	Calls from MARGaret and Rob Ritchie.	0.3	55.00	16.50
10/16/2006	Email from Rob Ritchie	0.2	55.00	11.00

Tax # 91-2088939

**Total**

# C & C LEGAL INVESTIGATIONS, INC

7 ST. HELENS SUITE #2  
TACOMA, WA 98402  
Phone (253) 572-6194  
Fax (253) 572-6216

## Invoice

Margaret Cook  
9313 217th St. Ct. E  
Graham, WA 98338  
Re: Garland, Ray

DATE                      INVOICE #  
10/30/2006                3257

TERMS                      CASE NUMBER  
Due on receipt            25-092 Garland

SERVICE DATE	DESCRIPTION	QTY/HOURS	RATE	AMOUNT
10/16/2006	Ph. discussion with Rob Ritchie, making arrangements to get to Arkansas.	0.4	55.00	22.00
10/17/2006	Arranging flight and lodging in Little Rock, AR.	1.5	55.00	82.50
10/17/2006	Called Marion Evans in Arkansas and she arranged 3 way conversation with JJ.	0.4	55.00	22.00
10/17/2006	Phone conversation with Margaret	0.3	55.00	16.50
10/18/2006	Set up final arrangements and reservations for hotel, etc.	0.4	55.00	22.00
10/18/2006	Went to airport and checked in for flight. Left car in parking garage. 12:30 am flight.	2	55.00	110.00
10/19/2006	Traveled to Little Rock to interview McMurrin: Flew to Houston. Connecting flight to Little Rock cancelled due to weather. Flew to Memphis and rented car (1 way rental) Drove to Little Rock and located current apt. address and phone number for McMurrin. Met McMurrin and interviewed him.	20	55.00	1,100.00
10/20/2006	Flew back from Little Rock via connecting flight to Atlanta. Arrived at Sea-Tac and drove to Tacoma. 20 miles.	8	55.00	440.00
	Isaac visited with client 2 times showing him interview transcripts.	4.6	35.00	161.00
10/20/2006	Airline tickets		890.70	890.70
	Hotel		110.39	110.39
	Rental car (one way rental)		162.46	162.46
	Gasoline for rental car		22.31	22.31
	Parking 2 days at Sea-Tac		44.00	44.00
	Meals		89.88	89.88

Fax # 91-2088939

**Total**                      \$4,252.74

# C & C LEGAL INVESTIGATIONS, INC

7 ST. HELENS SUITE #2  
TACOMA, WA 98402  
Phone (253) 572-6194  
Fax (253) 572-6216

## Invoice

Margaret Cook  
9313 217th St. Ct. E  
Graham, WA 98338  
Re: Garland, Ray

DATE                      INVOICE #  
12/29/2006                      3304

TERMS                      CASE NUMBER  
Due on receipt                      25-092 Garland

SERVICE DATE	DESCRIPTION	QTY/HOURS	RATE	AMOUNT
11/8/2006	Discussed Scheduling Of Interviews With Attorney	0.2	55.00	11.00
11/8/2006	Sent Email To Prosecutor	0.3	55.00	16.50
11/13/2006	Email From Margaret: Returned Email	0.3	55.00	16.50
11/13/2006	Phone Message From Expert Witness	0.2	55.00	11.00
11/13/2006	Sent Email To Attorney	0.2	55.00	11.00
11/13/2006	Phone Call And Email From Margaret Regarding Myspace	0.2	55.00	11.00
11/14/2006	Reviewed Myspace Account	0.3	55.00	16.50
11/16/2006	Discussion With Margaret	0.3	55.00	16.50
11/16/2006	Emails Regarding Karltn Marcy	0.2	55.00	11.00
11/20/2006	Phone Discussion With Margaret	0.3	55.00	16.50
11/22/2006	Printed Out Remaining Witness Transcripts	0.6	55.00	33.00
11/23/2006	Made Copies And Met Margaret In Ruston	2	55.00	110.00
11/24/2006	Phone Message From Margaret	0.2	55.00	11.00
11/25/2006	Phone Conversation With Margaret	0.3	55.00	16.50
11/27/2006	Phone Call From/ Conversation With Margaret	0.2	55.00	11.00
11/29/2006	Phone Conversation With Margaret Re: Heishman And Other Interviewer	0.5	55.00	27.50
11/29/2006	Wrote And Sent Email To Attorney	0.3	55.00	16.50
12/13/2006	Phone Call From Margaret	0.3	55.00	16.50
12/14/2006	Wrote Memo To Attorney Re: Prosecution Not Providing Witness Interviews	0.4	55.00	22.00
12/15/2006	Phone Message From Attorney Re: Interviews; I Called And Left A Message	0.3	55.00	16.50
12/18/2006	Discussion With Margaret On Interviews; Received Email Report From Rob Ritchie	0.5	55.00	27.50
12/18/2006	Preparation For Interview	1	55.00	55.00

Tax # 91-2088939

**Total**

# C & C LEGAL INVESTIGATIONS, INC

7 ST. HELENS SUITE #2  
TACOMA, WA 98402  
Phone (253) 572-6194  
Fax (253) 572-6216

## Invoice

Margaret Cook  
9313 217th St. Ct. E  
Graham, WA 98338  
Re: Garland, Ray

DATE                      INVOICE #  
12/29/2006                3304

TERMS                      CASE NUMBER  
Due on receipt            25-092 Garland

SERVICE DATE	DESCRIPTION	QTY/HOURS	RATE	AMOUNT
12/19/2006	Interviewed Lisa Lambert And Started Interview With Det. Heishman; Discussion With Attorney; Phone Conversation With Margaret	4.5	55.00	247.50
12/20/2006	Reviewed Notes From Det. Heishman Interview	0.6	55.00	33.00
12/20/2006	Interview Of Det. Heishman. Meeting With Attorney; Obtained Lisa Lambert Casino Subpoena; Served Subpoena	1.9	55.00	104.50
12/20/2006	Phone Discussion With Margaret	0.3	55.00	16.50
12/27/2006	Went To Attorney's Office For Karltin Marcy Interview Waited But He Did Not Show Up	1	55.00	55.00
12/27/2006	Emails, Phone Calls To/From Attorney And Margaret	0.6	55.00	33.00
12/28/2006	Printed Up Heishman And Lisa Lambert Interviews	1	55.00	55.00
12/29/2006	Went to Kinko's; Made Copies Of Heishman And Lisa Lambert Interviews. Called Margaret; Met Margaret And Dropped Off Copies	1	55.00	55.00
	Copy Charges	1	144.40	144.40
	Copy Charges	1	56.57	56.57

Tax # 91-2088939

**Total**                      \$1,300.97

# C & C LEGAL INVESTIGATIONS, INC

7 ST. HELENS SUITE #2  
TACOMA, WA 98402  
Phone (253) 572-6194  
Fax (253) 572-6216

**PAID**

## Invoice

Margaret Cook  
9313 217th St. Ct. E  
Graham, WA 98338  
Re: Garland, Ray

DATE INVOICE #  
2/1/2007 3335

TERMS CASE NUMBER  
Due on receipt 25-092 Garland

SERVICE DATE	DESCRIPTION	QTY/HOURS	RATE	AMOUNT
1/1/2007	Phone call from Margaret. Later, phone conference with Margaret.	1.2	55.00	66.00
1/2/2007	Phone conversation with Margaret.	0.3	55.00	16.50
1/3/2007	Phone calls and emails to and from Margaret.	1.2	55.00	66.00
1/4/2007	Went to Sheriff's Dept and purchased Court Security video disk. Went to Clerk's office and researched Tim Valentine. Examined video and called Margaret. \$20.00 fee	2	55.00	110.00
1/5/2007	Conversation with Margaret.	0.3	55.00	16.50
1/7/2007	Ph.msg. from Rob Ritchie.	0.2	55.00	11.00
1/8/2007	Phone call from Lilly	0.3	55.00	16.50
1/8/2007	Ph. call from attorney.	0.3	55.00	16.50
1/9/2007	Obtained jail clearance forms and faxed to Lilly.	0.3	55.00	16.50
1/9/2007	Phone call from attorney.	0.2	55.00	11.00
1/9/2007	Ph. call from Lilly-barber has a felony.	0.2	55.00	11.00
1/9/2007	Went and contacted Lilly and picked up signed jail clearance forms for new barber..	1	55.00	55.00
1/10/2007	Meeting with attorney.	0.7	55.00	38.50
1/10/2007	Went to District Court and obtained vehicle impound records. \$17.00 Records fee	1.2	55.00	66.00
1/10/2007	Phone message from Lilly. I called her back.	0.3	55.00	16.50
1/10/2007	Took jail clearance form to Sheriff's Dept. and gave it to Craig Adams.	0.8	55.00	44.00
1/11/2007	Two phone conversations with attorney.	0.4	55.00	22.00
1/11/2007	emails from attorney and prosecutor.	0.3	55.00	16.50
1/11/2007	Phone converssation with barber, set up appointment at jail.	0.3	55.00	16.50

Tax # 91-2088939

**Total**

# C & C LEGAL INVESTIGATIONS, INC

7 ST. HELENS SUITE #2  
TACOMA, WA 98402  
Phone (253) 572-6194  
Fax (253) 572-6216

**PAID**

## Invoice

Margaret Cook  
9313 217th St. Ct. E  
Graham, WA 98338  
Re: Garland, Ray

DATE INVOICE #  
2/1/2007 3335

TERMS CASE NUMBER  
Due on receipt 25-092 Garland

SERVICE DATE	DESCRIPTION	QTY/HOURS	RATE	AMOUNT
1/12/2007	Phone conversation with Sheriff's Legal Advisor Craig Adams.	0.3	55.00	16.50
1/12/2007	Left ph msg. for Lilly.	0.2	55.00	11.00
1/12/2007	Went to attorney's office and picked up paperwork. Called barber and confirmed appointment.	0.5	55.00	27.50
1/14/2007	Met barber at jail. Arranged haircut. Paid barber \$200 cash	1.5	55.00	82.50
1/14/2007	Phone call and discussion with Rob Ritchie.	0.3	55.00	16.50
1/14/2007	Setting up trial exhibits.	1.5	55.00	82.50
1/15/2007	Phone call from Margaret. I left message for attorney	0.3	55.00	16.50
1/15/2007	Prep. for court.	1.5	55.00	82.50
1/16/2007	Court.	2.5	55.00	137.50
1/16/2007	Rebecca Rieland interview and discussion with attorney.	1.5	55.00	82.50
1/16/2007	Prep for court.	2	55.00	110.00
1/17/2007	Court	1.5	55.00	82.50
1/17/2007	Went to jail and interviewed Forrest Cable.	1.1	55.00	60.50
1/18/2007	Franks hearing.	5.6	55.00	308.00
1/19/2007	Went to attorney's office to interview Brian Minturn and Ray Shaviri (no one showed)	1.2	55.00	66.00
1/19/2007	Phone calls and emails to and from attorney.	0.5	55.00	27.50
1/20/2007	Phone call from Margaret.	0.2	55.00	11.00
1/20/2007	Went to Kinkos and made enlargement of exhibits. \$19.58 copy fees.	1.5	55.00	82.50
1/21/2007	Drove to So. K address and interviewed Arthur Peterson.	1.3	55.00	71.50

Tax # 91-2088939

**Total**

# C & C LEGAL INVESTIGATIONS, INC

7 ST. HELENS SUITE #2  
TACOMA, WA 98402  
Phone (253) 572-6194  
Fax (253) 572-6216

PAID

## Invoice

Margaret Cook  
9313 217th St. Ct. E  
Graham, WA 98338  
Re: Garland, Ray

DATE                      INVOICE #  
2/1/2007                      3335

TERMS                      CASE NUMBER  
Due on receipt              25-092 Garland

SERVICE DATE	DESCRIPTION	QTY/HOURS	RATE	AMOUNT
1/21/2007	Made arrangements for large court exhibits. Gave \$150 cash to Glenn Leonard to prepare exhibit boards and mylar.	1.2	55.00	66.00
1/22/2007	Court.	5.5	55.00	302.50
1/23/2007	Court.	6.5	55.00	357.50
1/24/2007	Worked on court exhibits and prep for court. Paid \$200 check to Glenn Leonard.	2	55.00	110.00
1/25/2007	Worked on retaining expert witness (handwriting)	1.4	55.00	77.00
1/27/2007	Met with Expert Witness Rob Floberg and gave him retainer check from Margaret. Also gave him original notes of Steve Wilkins.	2	55.00	110.00
1/28/2007	Phone discussion with Margaret and attorney. Drove to area near Bleachers and searched. Made arrangements for associate to serve defense subpoenas.	3	55.00	165.00
1/29/2007	Short court day-Ray sick.	2	55.00	110.00
1/30/2007	Court	4.5	55.00	247.50
1/30/2007	Prep for court	2	55.00	110.00
1/30/2007	Made arrangements to have holster photos blown up	1	55.00	55.00
1/31/2007	Went and picked up enlargements of my holster photos.        \$52.22 photo enlargement fees.	0.6	55.00	33.00
1/31/2007	Paid remainder of fee to Glenn Leonard for court exhibits, etc.        \$132.		132.00	132.00
	Purchase of court video on 1/4/07		20.00	20.00
	Records Fees Dist. Ct. 1 on 1/10		17.00	17.00

Tax # 91-2088939

Total

**C & C LEGAL INVESTIGATIONS, INC**

7 ST. HELENS SUITE #2  
TACOMA, WA 98402  
Phone (253) 572-6194  
Fax (253) 572-6216

**PAID**

**Invoice**

Margaret Cook  
9313 217th St. Ct. E  
Graham, WA 98338  
Re: Garland, Ray

DATE INVOICE #  
2/1/2007 3335

TERMS CASE NUMBER  
Due on receipt 25-092 Garland

SERVICE DATE	DESCRIPTION	QTY/HOURS	RATE	AMOUNT
	Barber at jail 1/14		200.00	200.00
	Copy Charges at Kinko's 1/20		19.58	19.58
	Payed \$150 cash deposit to Glenn Leonard to buy supplies and start making exhibits.		150.00	150.00
	Payed \$200 check to Glenn Leonard toward exhibit costs.		200.00	200.00
	Photo enlargements of Holster.		52.22	52.22

Tax # 91-2088939

**Total** \$4,541.80

# C & C LEGAL INVESTIGATIONS, INC

7 ST. HELENS SUITE #2  
TACOMA, WA 98402  
Phone (253) 572-6194  
Fax (253) 572-6216

## Invoice

Margaret Cook  
9313 217th St. Ct. E  
Graham, WA 98338

DATE INVOICE #  
5/14/2007 3434

TERMS CASE NUMBER

Due on receipt

SERVICE DATE	DESCRIPTION	QTY/HOURS	RATE	AMOUNT
2/1/2007	Attended trial Motion for mistrial	3	55.00	165.00
2/3/2007	Two phone calls from Mike Garland. Ray needs to see us regarding letter from juror. Barbara and I went to jail and met with Ray	1.8	55.00	99.00
2/4/2007	Prep for court	2.1	55.00	115.50
2/5/2007	Court	6.5	55.00	357.50
2/5/2007	Prep for court	1.2	55.00	66.00
2/6/2007	Court	4	55.00	220.00
2/7/2007	Met with handwriting expert Rob Floberg. Gave him original notebook page from Deputy Johnson to analyze	1.6	55.00	88.00
2/7/2007	Court-Mistrial declared	1.5	55.00	82.50
2/7/2007	Met with Glenn Leonard and made final payment for preparation of exhibits. (Pd \$39.74)	0.3	55.00	16.50
2/7/2007	Client Reimbursable Cost-\$39.74		39.74	39.74
2/23/2007	Attended court-motion to dismiss hearing	1.6	55.00	88.00
3/30/2007	Met with TNT editor and talked about news coverage	1	55.00	55.00
4/3/2007	Sent email to Craig Adams about setting up haircut. Called barber	0.5	55.00	27.50
4/5/2007	Received email authorization from Craig Adams. Called and left msg with Sgt Johnson at jail	0.4	55.00	22.00
4/5/2007	Called jail and set up appointment through Sgt. Braswell	0.2	55.00	11.00
4/6/2007	Called Margaret about haircut	0.2	55.00	11.00
4/7/2007	Sgt. Braswell called back and confirmed appointment	0.2	55.00	11.00
4/9/2007	Ph call from Margaret	0.2	55.00	11.00

Tax # 91-2088939

**Total**

# C & C LEGAL INVESTIGATIONS, INC

7 ST. HELENS SUITE #2  
TACOMA, WA 98402  
Phone (253) 572-6194  
Fax (253) 572-6216

## Invoice

Margaret Cook  
9313 217th St. Ct. E  
Graham, WA 98338

DATE INVOICE #  
5/14/2007 3434

TERMS CASE NUMBER

Due on receipt

SERVICE DATE	DESCRIPTION	QTY/HOURS	RATE	AMOUNT
4/10/2007	Ph call from Margaret	0.2	55.00	11.00
4/10/2007	I called Sgt. Braswell and advised her of new haircut date	0.2	55.00	11.00
4/19/2007	Ph call from attorney	0.3	55.00	16.50
4/20/2007	Picked up trial transcripts from attorney	0.5	55.00	27.50
4/20/2007	Delivered some of transcripts to Ray at jail	0.7	55.00	38.50
4/21/2007	Ph call from Margaret	0.2	55.00	11.00
4/23/2007	Dropped off and picked up transcripts from Ray	0.8	55.00	44.00
4/28/2007	Dropped off and picked up transcripts from Ray	0.7	55.00	38.50
4/30/2007	Phone call from attorney	0.3	55.00	16.50
5/2/2007	Ph msg from Margaret	0.2	55.00	11.00
5/2/2007	Picked up transcripts from Ray	0.6	55.00	33.00
5/2/2007	I tried to contact Craig Stewart by phone-disconnected	0.2	55.00	11.00
5/2/2007	Computer research to locate current address/phone of Craig Stewart	0.5	55.00	27.50
5/2/2007	Wrote letter to Craig Stewart. Letter came back- He moved	0.3	55.00	16.50
5/5/2007	Went to jail and met with barber for Ray's haircut	1.2	55.00	66.00
5/5/2007	Ph conversation with attorney	0.3	55.00	16.50
5/7/2007	Computer search to locate witness Matthias Brown	0.4	55.00	22.00
5/7/2007	Ph msg. from Margaret	0.2	55.00	11.00
5/8/2007	Interview of Karltin Marcy at Barbara's office. Trial continued	1.7	55.00	93.50

Tax # 91-2088939

**Total**

\$2,008.74

# C & C LEGAL INVESTIGATIONS, INC

7 ST. HELENS SUITE #2  
TACOMA, WA 98402  
Phone (253) 572-6194  
Fax (253) 572-6216

## Invoice

Margaret Cook  
9313 217th St. Ct. E  
Graham, WA 98338  
Re: Garland, Ray

DATE INVOICE #  
8/5/2007 3512

TERMS CASE NUMBER  
Due on receipt 25-092 Garland

SERVICE DATE	DESCRIPTION	QTY/HOURS	RATE	AMOUNT
5/30/2007	Downloaded Karitin Marcy's Interview Transcript, Made 2 Copies, Mailed One To Margaret	0.5	55.00	27.50
6/5/2007	Delivered Copy Of Transcript To Ray	0.5	55.00	27.50
6/6/2007	Phone Discussion With Margaret	0.3	55.00	16.50
7/12/2007	Phone Call To Pat LaChapelle	0.2	55.00	11.00
7/23/2007	Phone Call From Barbara	0.2	55.00	11.00
7/23/2007	Emails From/To Barbara	0.2	55.00	11.00
7/24/2007	Computer And Phone Research To Contact Andre (Matthias) Brown	0.4	55.00	22.00
7/24/2007	Called Pat LaChapelle And Set Up Interview	0.2	55.00	11.00
7/24/2007	Sent Email To Barbara	0.2	55.00	11.00
7/24/2007	Phone Conversation With Margaret	0.2	55.00	11.00
7/25/2007	Court Record Research To Locate Andre (Matthias) Brown	1	55.00	55.00
7/25/2007	Contacted Andre (Matthias) Brown's Father	0.2	55.00	11.00
7/26/2007	Phone Discussion With Margaret	0.2	55.00	11.00
7/26/2007	Two Phone Conversations With Barbara	0.3	55.00	16.50
7/29/2007	Email From Margaret	0.2	55.00	11.00
7/29/2007	Research And Calls To Locate Andre Brown	0.5	55.00	27.50
7/30/2007	Drove To Parkland; Wayne Thompson Moved	1	55.00	55.00
7/31/2007	Interviewed Pat LaChapelle At Barbara's Office	1	55.00	55.00
8/1/2007	Left Phone Message For Maria At "Park 52" Property Management	0.2	55.00	11.00
8/2/2007	Phone Message And Conversation With Maria	0.3	55.00	16.50
8/3/2007	Phone Discussion With Margaret	0.3	55.00	16.50
8/3/2007	Called Craig Stewart At Wal-Mart; Not There	0.2	55.00	11.00
8/4/2007	Escorted Barber To Jail For Ray's Haircut	1.5	55.00	82.50
8/5/2007	Worked On Reorganizing Case	1	55.00	55.00

**Total** \$594.00

# GLENN LEONARD INVESTIGATIONS

7 ST. HELENS SUITE #2  
TACOMA, WA 98402  
Phone (253) 572-6194  
Fax (253) 572-6216

## Invoice

C & C Legal Investigations  
Re: Garbar d

8/13/07  
Pd \$228.42  
CK #4347

DATE                      INVOICE #  
8/13/2007                      3517

TERMS                      CASE NUMBER

SERVICE DATE	DESCRIPTION	QTY/HOURS	RATE	AMOUNT
8/8/2007	Retainer	1	-150.00	-150.00
8/10/2007	Retainer check	1	-100.00	-100.00
8/8/2007	To Michaels, bought 2 frames, and then to Kinkos for one enlargement (8 Miles)	1	20.00	20.00
8/9/2007	To Robis, dropped off negs, and photo. Then to Office Depot for colored felt pens (20 Miles)	1.5	20.00	30.00
8/10/2007	To Robis and Michaels to pick up finished work (20 Miles)	1.5	20.00	30.00
8/11/2007	Redrafted a strip map and to kinkos for enlargement. (8 Miles)	2	20.00	40.00
8/11/2007	Mount and frame photo 24X32	1	28.34	28.34
8/11/2007	Mount and frame photo 20X24	1	23.76	23.76
8/11/2007	Mount and frame strip map 24X32	1	28.34	28.34
	Total Mileage	56	0.50	28.00
8/8/2007	Michaels	1	54.36	54.36
8/8/2007	FedEx Kinkos	1	4.90	4.90
10/10/2007	Robi's	1	157.02	157.02
10/10/2007	Michaels	1	28.80	28.80
10/11/2007	Fedex	1	4.90	4.90

**Total**                      \$228.42

+ C & C Pd                      250.00  
+ Retainers                      478.42

# C & C LEGAL INVESTIGATIONS, INC

7 ST. HELENS SUITE #2  
TACOMA, WA 98402  
Phone (253) 572-6194  
Fax (253) 572-6216

## Invoice

Margaret Cook  
9313 217th St. Ct. E  
Graham, WA 98338  
Re: Garland, Ray

DATE INVOICE #  
8/31/2007 3523

TERMS CASE NUMBER  
Due on receipt 25-092 Garland

SERVICE DATE	DESCRIPTION	QTY/HOURS	RATE	AMOUNT
8/6/2007	Court	2.5	55.00	137.50
8/7/2007	Court	2.2	55.00	121.00
8/8/2007	Court And Phone Calls/ Email To Rob Floberg	5	55.00	275.00
8/9/2007	Received Email Report From Rob Floberg; Made Copies	0.5	55.00	27.50
8/9/2007	Attended Court Picked Jury	4.5	55.00	247.50
8/10/2007	Invoice from Glenn Leonard Investigations for court exhibits. Photo and exhibit creation and blowups. Also photos converted to digital format for powerpoint. (Invoice attached)		478.42	478.42
8/13/2007	Attended Court	4.7	55.00	258.50
8/13/2007	Worked On Getting Court Exhibits Finished	1	55.00	55.00
8/14/2007	Morning Court	1.5	55.00	82.50
8/14/2007	Jerry Wrote Questions For IT Person	1	55.00	55.00
8/14/2007	Afternoon Court	1	55.00	55.00
8/14/2007	Met With Attorney And Went Through New Discovery	2	55.00	110.00
8/15/2007	Reviewed New Discovery	1	55.00	55.00
8/16/2007	Called Numbers In Discovery	0.7	55.00	38.50
8/17/2007	Called Margaret's Neighbors; Left Messages, Talked To Joni Donner	0.6	65.00	39.00
8/17/2007	Went To Court-Status Conference And Juror #1 Hardship. Interviewed Court Security Deputy Chris Todd.	1.2	55.00	66.00
8/17/2007	Went To Barbara's Office And Interviewed IT Person Tom Jones	1	55.00	55.00
8/17/2007	Jerry assisted at interview of IT person	1	55.00	55.00
8/20/2007	Phone Calls To Margaret's Neighbors	0.5	55.00	27.50

Tax # 91-2088939

**Total**

# C & C LEGAL INVESTIGATIONS, INC

7 ST. HELENS SUITE #2  
TACOMA, WA 98402  
Phone (253) 572-6194  
Fax (253) 572-6216

## Invoice

Margaret Cook  
9313 217th St. Ct. E  
Graham, WA 98338  
Re: Garland, Ray

DATE INVOICE #  
8/31/2007 3523

TERMS CASE NUMBER  
Due on receipt 25-092 Garland

SERVICE DATE	DESCRIPTION	QTY/HOURS	RATE	AMOUNT
8/20/2007	Researched Police Reports For Barbara	0.5	65.00	32.50
8/20/2007	Court	2.5	55.00	137.50
8/20/2007	Drove To East End And Lakewood in evening RE: Karltn Marcy's girlfriends. 36 miles	1.5	55.00	82.50
8/21/2007	Court	6	55.00	330.00
8/21/2007	Prepared For Court	1.5	55.00	82.50
8/21/2007	Evening Drove To Three Locations To Find Karltn Marcy's Girl-Friends. Drove To Wal-Mart In Puyallup And left message for Craig Stewart 46 miles	2.5	55.00	137.50
8/21/2007	Received Notebook Pages Back From Floberg At Office	0.3	55.00	16.50
8/22/2007	Court and Made Enlargement At Kinko's During Noon Hour	7	55.00	385.00
8/23/2007	Court- Went To District Court And Municipal Court On Lunch Recess And Obtained Court Papers on Karltn Marcy from Muni Court (ordered district court)	5.5	55.00	302.50
8/24/2007	Phone Calls, Emails To Obtain Edited Report By Rob Floberg. Case review	1.5	55.00	82.50
8/26/2007	Review And Preparation For Karltn Marcy Testimony	1.7	55.00	93.50
8/27/2007	Trial And Case Preparation. Background on Jessica Hicks	7	55.00	385.00
8/28/2007	Trial. Lunch Break Meeting With Attorney	6.5	55.00	357.50
8/28/2007	Field Work To Locate Witnesses And Serve Subpoenas 34 miles	4.6	55.00	253.00

Tax # 91-2088939

**Total**

**C & C LEGAL INVESTIGATIONS, INC**

7 ST. HELENS SUITE #2  
 TACOMA, WA 98402  
 Phone (253) 572-6194  
 Fax (253) 572-6216

**Invoice**

Margaret Cook  
 9313 217th St. Ct. E  
 Graham, WA 98338  
 Re: Garland, Ray

DATE INVOICE #  
 8/31/2007 3523

TERMS CASE NUMBER  
 Due on receipt 25-092 Garland

SERVICE DATE	DESCRIPTION	QTY/HOURS	RATE	AMOUNT
8/29/2007	3 investigators attempting service of subpoenas 106 miles	6	55.00	330.00
8/29/2007	Computer research and attempting to find 3 ex-girlfriends of Marcy (BOB) 38 miles	2.6	55.00	143.00
8/30/2007	Efforts to locate witnesses and obtain DOC files	4	55.00	220.00
8/30/2007	Investigator (Warren) served subpoena on DOC and made arrangements to obtain files 22 miles	2	55.00	110.00
8/31/2007	Efforts to locate and contact witnesses 26 miles	3.8	55.00	209.00
8/31/2007	Investigator went to District Court and obtained Marcy's records. Made copy and delivered to attorney. (\$18.00 records fee)	1	55.00	55.00
8/31/2007	Investigator (Warren) recontacted DOC with new subpoena and obtained unredacted files on Marcy 20 miles	1.5	55.00	82.50
8/31/2007	Total Mileage 328 miles @ .50 per mile	328	0.50	164.00
8/31/2007	Records Fees District Court		18.00	18.00

Tax # 91-2088939

**Total**

**\$6,248.42**

# C & C LEGAL INVESTIGATIONS, INC

7 ST. HELENS SUITE #2  
TACOMA, WA 98402  
Phone (253) 572-6194  
Fax (253) 572-6216

## Invoice

Margaret Cook  
9313 217th St. Ct. E  
Graham, WA 98338

DATE INVOICE #  
10/8/2007 3537

TERMS CASE NUMBER

Due on receipt

SERVICE DATE	DESCRIPTION	QTY/HOURS	RATE	AMOUNT
9/1/2007	Computer search and attempts to locate Karitin Marcy's ex-girlfriend (26 Miles)	2.5	55.00	137.50
9/2/2007	Attempts to contact ex-girlfriend and recent victim (26 Miles)	1.5	55.00	82.50
9/3/2007	Attempts to contact ex-girlfriend and victim (26 Miles)	1.2	55.00	66.00
9/4/2007	Called DOC regarding missing records. Went and obtained them from DAC and dropped them off to attorney	1.3	55.00	71.50
9/4/2007	Reviewed Marcy's DOC file	0.5	55.00	27.50
9/4/2007	Phone calls and emails discussing with Rob Ritchie. Wrote outall of police officer subpoenas and served them.	4.5	55.00	247.50
9/5/2007	Court Time	6	55.00	330.00
9/5/2007	Computer and phone calls attempting to contact witnesses. Also, set up interviews w/ Deputy Rawlins and Craig Stewart.	2	55.00	110.00
9/6/2007	Court	5	55.00	275.00
9/6/2007	Phone confirmations of subpoenas	0.3	55.00	16.50
9/8/2007	Phone and emails with Rob Ritchie. Attempts to serve subpoenas and contact witnesses	2	55.00	110.00
9/10/2007	Court	3.8	55.00	209.00
9/11/2007	Meeting with Craig Stewart	2	55.00	110.00
9/12/2007	Phone calls/ research/ and called witnesses	0.5	55.00	27.50
9/12/2007	Reviewed Heishman's file at court house	2.2	55.00	121.00
9/12/2007	Reviewed new notes	1	55.00	55.00
9/16/2007	Reviewed transcripts	2	55.00	110.00
9/17/2007	Strategy session w/ attorney	1	55.00	55.00

Tax # 91-2088939

**Total**

## C & C LEGAL INVESTIGATIONS, INC

7 ST. HELENS SUITE #2  
TACOMA, WA 98402  
Phone (253) 572-6194  
Fax (253) 572-6216

# Invoice

Margaret Cook  
9313 217th St. Ct. E  
Graham, WA 98338

DATE                      INVOICE #  
10/8/2007                      3537

TERMS                      CASE NUMBER

Due on receipt

SERVICE DATE	DESCRIPTION	QTY/HOURS	RATE	AMOUNT
9/18/2007	Assisted w/ deposition, went to jail and discussed case w/ client. Drove attorney to So. K. Street Address and took photos	6	55.00	330.00
9/19/2007	Received deposition transcript and reviewed it, talked to attorney	1	55.00	55.00
9/20/2007	Court time and spoke to Craig Adams	2	55.00	110.00
9/23/2007	Updated subpoena list, filled out declarations of service on all subpoenas served	2.5	55.00	137.50
9/24/2007	Went to clerk's office and filed subpoenas served	0.6	55.00	33.00
9/25/2007	Reviewed transcripts regarding perjury issues	3.5	55.00	192.50
9/26/2007	Reviewed case regarding perjury issues	3	55.00	165.00
9/26/2007	Metting at atty's office w/ Barbara and Margaret	1	55.00	55.00
	Total Mileage	78	0.50	39.00

Tax # 91-2088939

**Total**                      \$3,278.50

# C & C LEGAL INVESTIGATIONS, INC

7 ST. HELENS SUITE #2  
TACOMA, WA 98402  
Phone (253) 572-6194  
Fax (253) 572-6216

## Invoice

Margaret Cook  
9313 217th St. Ct. E  
Graham, WA 98338

DATE INVOICE #  
12/15/2007 3608

TERMS CASE NUMBER

Due on receipt

SERVICE DATE	DESCRIPTION	QTY/HOURS	RATE	AMOUNT
9/28/2007	Research on Heishman complaint	5.5	55.00	302.50
10/2/2007	Research on Heishman complaint	4	55.00	220.00
10/5/2007	Research on Heishman complaint	3.4	55.00	187.00
10/11/2007	Research on Heishman complaint	4	55.00	220.00
10/12/2007	Went to Hickman's court. Went to Barbara's office and obained Heishman police reports	2	55.00	110.00
10/17/2007	Research on Heishman complaint	3.5	55.00	192.50
10/30/2007	Research on Heishman complaint	2	55.00	110.00
11/1/2007	Research on Heishman complaint	1.5	55.00	82.50
11/7/2007	Research on Heishman complaint	2.5	55.00	137.50
11/13/2007	Research on Heishman complaint	3.2	55.00	176.00
11/29/2007	Research on Heishman complaint	3.1	55.00	170.50
11/30/2007	Research on Heishman complaint	1	55.00	55.00
12/7/2007	Meeting with Margaret at Barbara's office	1.5	55.00	82.50
12/8/2007	Research on Heishman complaint	3.3	55.00	181.50

Tax # 91-2088939

**Total**

**\$2,227.50**

# C & C LEGAL INVESTIGATIONS

7 ST. HELENS SUITE #2  
TACOMA, WA 98402

## Invoice

Margaret Cook  
6801 So. M Street  
Tacoma, WA 98408  
Re: Garland, Ray

DATE                      INVOICE #  
11/11/2008                3939

TERMS                      CASE NUMBER  
Due on receipt            25-092 Garland

SERVICE DATE	DESCRIPTION	QTY/HOURS	RATE	AMOUNT
1/24/2008	Discussion with Barbara	0.3	55.00	16.50
1/25/2008	Went to court to testify on Ray's car being released	1	55.00	55.00
2/26/2008	Ph call from Barbara-Go see Ray	0.2	55.00	11.00
2/27/2008	Went to jail and contacted RAY	1	55.00	55.00
3/13/2008	Worked with Margaret at Barbara's office. Heishman complaint	1.5	55.00	82.50
3/17/2008	Dropped off envelope for Margaret to Barbara's office	0.3	55.00	16.50
3/24/2008	Phone conversation and email from Margaret	0.5	55.00	27.50
3/25/2008	Searched files for items needed for complaint	1	55.00	55.00
3/28/2008	Went to Kinko's and made copy of Valentine's trial testimony. Copy charge \$14.45.	0.5	55.00	27.50
3/31/2008	Ph conversation with Margaret	0.2	55.00	11.00
4/1/2008	Dropped off items to Barbara's office	0.3	55.00	16.50
9/6/2008	Saturday. Ph calls with Margaret and Barbara re: Ray needing contact ASAP	0.3	55.00	16.50
9/7/2008	Sunday. Went to the jail and contacted Ray and Inmate Samuel Alston	1.5	55.00	82.50
9/7/2008	Wrote report and emailed to Barbara	1	55.00	55.00
9/8/2008	Ph conversations with Margaret and Barbara. Left msg for Atty Kent Underwood	0.5	55.00	27.50
9/11/2008	Ph call from/discussion with Margaret	0.2	55.00	11.00
9/11/2008	Left ph msg for Kent Underwood	0.2	55.00	11.00
9/12/2008	Ph call from Underwood's secretary	0.2	55.00	11.00
9/12/2008	Left msg for Sgt Johnson at jail	0.2	55.00	11.00
9/14/2008	Prepared questions to ask Samuel Alston at interview	1	55.00	55.00

Tax # 91-2088939

**Total**

# C & C LEGAL INVESTIGATIONS

7 ST. HELENS SUITE #2  
TACOMA, WA 98402

## Invoice

Margaret Cook  
6801 So. M Street  
Tacoma, WA 98408  
Re: Garland, Ray

DATE                      INVOICE #  
11/11/2008                3939

TERMS                      CASE NUMBER  
Due on receipt            25-092 Garland

SERVICE DATE	DESCRIPTION	QTY/HOURS	RATE	AMOUNT
9/15/2008	Met with Investigator Glenn Leonard. We went to jail and did pre and taped interview with Samuel Alston. Went to office and downloaded interview onto computer file. Called and briefed Margaret. Wrote memo and attached to MP3 file and sent to Barbara. Cost of 2nd investigator/witness \$110.	2.5	55.00	137.50
9/18/2008	Ph msg from Margaret. Called and left msg. She called back and left msg	0.2	55.00	11.00
9/18/2008	Called Barbara's office. Had Tom Jones dec. faxed to me. Reviewed it and wrote email memo to Barbara	0.8	55.00	44.00
9/19/2008	Ph call from Margaret. I dropped off CD with Samiel Alston interview to Barbara.	0.3	55.00	16.50
10/1/2008	Ph conversation with Barbara	0.2	55.00	11.00
10/3/2008	Went to Barbara's. Picked up subpoenas	0.4	55.00	22.00
10/7/2008	Penner on maternity leave. I left msg with his assistant. Ph call from Penner	0.3	55.00	16.50
10/7/2008	I called Roger, Buckner's JA	0.2	55.00	11.00
10/16/2008	Went to CC Bldg and served 4 subpoenas	1	55.00	55.00
10/21/2008	Ph calls from/to Margaret	0.3	55.00	16.50
10/22/2008	Wrote out returns of service and dropped off to Barbara's office	0.5	55.00	27.50
10/23/2008	Reviewed discovery	0.4	55.00	22.00
10/23/2008	Meeting with Margaret and reporter at the News Tribune	1.3	55.00	71.50
10/30/2008	Ph conversation with Margaret. Called Jay Berneburg's office. Later, went to office and picked up paperwork	0.8	55.00	44.00

Tax # 91-2088939

**Total**

# C & C LEGAL INVESTIGATIONS

7 ST. HELENS SUITE #2  
TACOMA, WA 98402

## Invoice

Margaret Cook  
6801 So. M Street  
Tacoma, WA 98408  
Re: Garland, Ray

DATE                      INVOICE #  
11/11/2008                3939

TERMS                      CASE NUMBER  
Due on receipt            25-092 Garland

SERVICE DATE	DESCRIPTION	QTY/HOURS	RATE	AMOUNT
10/31/2008	Went to jail and had Ray review and sign declaration. Delivered it to attorney's office	1	55.00	55.00
11/3/2008	Ph conversation with Barbara. I called Tony Berger and advised his appearance cancelled.	0.3	55.00	16.50
11/6/2008	Ph call from Barbara's office. Went and picked up new subpoenas	0.4	55.00	22.00
11/12/2008	Ph discussion with Barbara	0.2	55.00	11.00
3/28/2008	Copy Charges		14.45	14.45
9/15/2008	Cost of 2nd Investigator/Witness for Samuel Alston interview	2	55.00	110.00

Tax # 91-2088939

**Total**                      **\$1,389.45**

# C & C LEGAL INVESTIGATIONS

1206 S 11th St, Bldg 4  
Tacoma, WA 98405

## Invoice

Margaret Cook  
6801 So. M Street  
Tacoma, WA 98408  
Re: Garland, Ray

DATE                      INVOICE #  
6/11/2009                      4082

TERMS                      CASE NUMBER  
Due on receipt                      25-092 Garland

SERVICE DATE	DESCRIPTION	QTY/HOURS	RATE	AMOUNT
11/19/2008	I called and left msg to serve Judge Buckner	0.2	55.00	11.00
11/20/2008	Received msg from JA Roger. Judge gone rest of month. Need to personal serve her	0.2	55.00	11.00
11/24/2008	Went to CC Bldg and served Heishman, Penner, and Berger. Wrote out Dec's of service	1	55.00	55.00
11/28/2008	I called and left msg for JA Roger to get appointment to serve Judge	0.2	55.00	11.00
12/1/2008	Msg from Roger. I can come to court tomorrow 9:00 and serve judge	0.2	55.00	11.00
12/2/2008	Ph converstion with atty's office	0.2	55.00	11.00
12/2/2008	Personal service on Judge Buckner. I made out dec. of service and delivered to atty.	1	55.00	55.00
12/5/2008	Went to court hearing on Motion to Dismiss. Continued. New subpoena for judge needed. Penner advised officers to honor subpoena	1.8	55.00	99.00
12/8/2008	Sent email to Barbara re: new subpoena for judge	0.2	55.00	11.00
12/9/2008	Discussion with Barbara re: Shelly Dominick interview	0.3	55.00	16.50
12/10/2008	Ph discussion with atty's office re: new subpoena	0.2	55.00	11.00
12/11/2008	Picked up new subpoenas from atty office	0.4	55.00	22.00
12/17/2008	Email from Barbara scheduling Shelly Dominick interview. I returned email with scheduling info	0.3	55.00	16.50
12/26/2008	Email from Barbara scheduling Shelly Dominick interview	0.2	55.00	11.00
12/26/2008	Ph discussion with Barbara	0.3	55.00	16.50
12/29/2008	Meeting with Barbara at her office	0.6	55.00	33.00
1/5/2009	Email received. Interview cancelled. I called Barbara. Received email	0.3	55.00	16.50

Tax # 91-2088939

**Total**

# C & C LEGAL INVESTIGATIONS

1206 S 11th St, Bldg 4  
Tacoma, WA 98405

## Invoice

Margaret Cook  
6801 So. M Street  
Tacoma, WA 98408  
Re: Garland, Ray

DATE                      INVOICE #  
6/11/2009                      4082

TERMS                      CASE NUMBER  
Due on receipt                      25-092 Garland

SERVICE DATE	DESCRIPTION	QTY/HOURS	RATE	AMOUNT
1/7/2009	Email from Barbara. Case being reassigned to new judge	0.2	55.00	11.00
1/16/2009	Email and phone call from Barbara re: Behe's statement to police	0.3	55.00	16.50
1/18/2009	Ph conversations with Margaret and several attempts to contact Behe at work	1	55.00	55.00
1/19/2009	Short phone interview with Behe	0.3	55.00	16.50
1/19/2009	Ph discussion with Margaret re: Behe. Ph call to Barbara. Email from Barbara	0.4	55.00	22.00
1/20/2009	Ph discussion with Barbara/left msg for Margaret	0.3	55.00	16.50
1/21/2009	Ph conversation with Mike Behe. Set up meeting	0.3	55.00	16.50
1/22/2009	Went to Puyallup. Met with and interviewed Mike Behe. Tape recorded interview. Went to office. Made backup copy. Took tape to Barbara's office to have it transcribed. Ph discussion with Margaret	3	55.00	165.00
1/23/2009	Prepared/reviewed Shelly Dominick transcripts. Went to interview at Barbara's office. Dominick did not show up. Called and advised Margaret	1.8	55.00	99.00
1/26/2009	Ph calls with Barbara and Margaret	0.5	55.00	27.50
1/27/2009	Email from atty office re: witness list	0.2	55.00	11.00
2/2/2009	Email from Barbara. Reviewed Penner's additional basis for sanctions (regarding me)	0.4	55.00	22.00
2/3/2009	I wrote declaration re: my contacts with Behe and gave it to Barbara. Email from Barbara re: Penner's response to report on Behe interview	1	55.00	55.00
2/10/2009	I picked up CD from Barbara and listened to Behe's police interview/compared word for word with transcript. Had conversations with Barbara	1.5	55.00	82.50

**Total**

Tax # 91-2088939

# C & C LEGAL INVESTIGATIONS

1206 S 11th St, Bldg 4  
Tacoma, WA 98405

## Invoice

Margaret Cook  
6801 So. M Street  
Tacoma, WA 98408  
Re: Garland, Ray

DATE INVOICE #  
6/11/2009 4082

TERMS CASE NUMBER  
Due on receipt 25-092 Garland

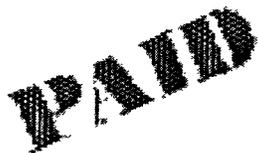
SERVICE DATE	DESCRIPTION	QTY/HOURS	RATE	AMOUNT
2/24/2009	Email from Barbara. I wrote response and emailed back	0.3	55.00	16.50
3/1/2009	Ph call and email to atty	0.3	55.00	16.50
3/2/2009	Ph call to atty office. Email to atty	0.3	55.00	16.50
3/5/2009	Went to atty office and picked up new subpoenas. Served Buckner, Penner, Heishman, and Berger	1.3	55.00	71.50
3/5/2009	Ph conversation with Tony Berger	0.3	55.00	16.50
3/6/2009	Ph call from/short conversation with Heishman	0.2	55.00	11.00
3/9/2009	Advised case continued until 3/17/09. I called and advised the witnesses	0.4	55.00	22.00
3/10/2009	I went to the clerk's office and filed Subpoena's and Dec's	0.6	55.00	33.00
3/11/2009	I sent email to atty	0.2	55.00	11.00
3/17/2009	Received call from Barbara's office. Case continued until 6/15/09. I called and talked to JA Roger and left ph msgs for Heishman and Berger	0.4	55.00	22.00
6/10/2009	Emails from Barbara and Penner re: Shelly Dominick/Pat LaChappelle interviews	0.2	55.00	11.00
6/11/2009	Emails	0.2	55.00	11.00

Tax # 91-2088939

**Total** \$1,292.50

# C & C LEGAL INVESTIGATIONS

1206 S 11th St, Bldg 4  
Tacoma, WA 98405



## Invoice

Margaret Cook  
6801 So. M Street  
Tacoma, WA 98408  
Re: Garland, Ray

DATE                      INVOICE #  
8/10/2009                      4112

TERMS                      CASE NUMBER  
Due on receipt                      25-092 Garland

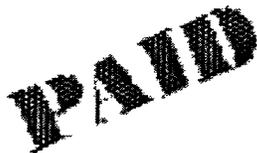
SERVICE DATE	DESCRIPTION	QTY/HOURS	RATE	AMOUNT
6/12/2009	Emails from/to Barbara	0.2	55.00	11.00
6/12/2009	Researched court data on Marcy-found \$75,000 warrant	0.4	55.00	22.00
6/15/2009	Ph conversation with Barbara. Faxed and emailed info. to her	0.3	55.00	16.50
6/17/2009	Computer research on KarltnMarcy King Co. Case	0.3	55.00	16.50
6/19/2009	Went to Barbara's office for Dominick interview-cancelled-Discussed case strategy w9ith Barbara	0.5	55.00	27.50
6/19/2009	Emails regarding scheduling interviews	0.3	55.00	16.50
6/21/2009	Ph discussion with Margaret and attorney office	0.3	55.00	16.50
7/21/2009	Went to attorney office. Picked up discovery	0.3	55.00	16.50
7/24/2009	Ph conversation with attorney office. Received jail phone transcripts by email. I began reviewing it	0.9	55.00	49.50
7/24/2009	Went to Pros. Office, and Sheriff's Office-served subpoenas	0.6	55.00	33.00
7/24/2009	Researched home address for retired Lt Gooch. Found current address. Went to house to serve-no one home	1	55.00	55.00
7/24/2009	Went back to Gooch's house and served him	0.6	55.00	33.00
7/25/2009	Ph msg from/to Roger Gooch. Ph msg from Margaret	0.3	55.00	16.50
7/26/2009	Looked up Marcy on internet most wanted	0.4	55.00	22.00
7/27/2009	Went to court and served Judge Buckner. Ph call from Margaret. Went to atty office and met with Barbara	1	55.00	55.00
7/27/2009	Computer searches on Fred Gonzales and female Gonzales	1	55.00	55.00

Tax # 91-2088939

**Total**

# C & C LEGAL INVESTIGATIONS

1206 S 11th St, Bldg 4  
Tacoma, WA 98405



## Invoice

Margaret Cook  
6801 So. M Street  
Tacoma, WA 98408  
Re: Garland, Ray

DATE                      INVOICE #  
8/10/2009                      4112

TERMS                      CASE NUMBER  
Due on receipt                      25-092 Garland

SERVICE DATE	DESCRIPTION	QTY/HOURS	RATE	AMOUNT
7/27/2009	Finished reviewing phone call transcripts.	0.7	55.00	38.50
7/27/2009	Phone conversation with Margaret. Went to jail and ctd. RAY. Reviewed discovery and gave him phone transcripts	1	55.00	55.00
7/28/2009	Phone call with Margaret	0.3	55.00	16.50
7/28/2009	Phone conversation with attorney	0.3	55.00	16.50
7/29/2009	In Court	4.7	55.00	258.50
7/30/2009	In Court	5.5	55.00	302.50
7/31/2009	Interviews of Ringer, LaChapelle, and Dominick	4.4	55.00	242.00
8/2/2009	Ph msg from Margaret. Email to atty. Dropped off negatives for development	0.4	55.00	22.00
8/3/2009	Picked up prints and dropped off prints to attorney office. Photo processing \$12.46	0.4	55.00	22.00
8/6/2009	Two emails from Barbara	0.2	55.00	11.00
8/6/2009	Ph call to Vendor to produce Mylar sheets	0.2	55.00	11.00
8/7/2009	Email from atty. Pulled materials on witnesses for 1st day of trial	0.4	55.00	22.00
8/9/2009	Email and ph conversation with atty. Went to jail and discussed strategy with Ray. Sent email to atty.	1.5	55.00	82.50
8/10/2009	In Court	6.4	55.00	352.00
8/11/2009	In Court. Served subpoenas to PCSD personnel. Purchased custom made Mylar sheets for court exhibits (\$65)	6	55.00	330.00
8/12/2009	In court. After court, went to jail and witnessed PCSD photographing Ray's tatoos.	7	55.00	385.00
8/13/2009	In Court.	5.4	55.00	297.00

Tax # 91-2088939

**Total**

# C & C LEGAL INVESTIGATIONS

1206 S 11th St, Bldg 4  
Tacoma, WA 98405

**PAID**

## Invoice

Margaret Cook  
6801 So. M Street  
Tacoma, WA 98408  
Re: Garland, Ray

DATE            INVOICE #  
8/10/2009       4112

TERMS            CASE NUMBER  
Due on receipt    25-092 Garland

SERVICE DATE	DESCRIPTION	QTY/HOURS	RATE	AMOUNT
	Film and processing		12.46	12.46
	Mylar sheets-cut and mounted		65.00	65.00
	Preferred Customer Discount		-3.46	-3.46
8/13/2009	Received \$3,000 check for payment of this invoice			

Tax # 91-2088939

**Total**            \$3,000.00

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2  
3 IN THE COURT OF APPEALS  
4 OF THE STATE OF WASHINGTON  
5 DIVISION II

6 IN RE THE PERSONAL RESTRAINT  
7 PETITION OF:

8 RAYMOND GARLAND,

9 Petitioner

NO. 45165-4-II

DECLARATION OF  
ELIZABETH GARLAND

- 10  
11 1. My name is Elizabeth Garland. I am the sister of Petitioner, Raymond  
12 Garland.
- 13 2. During the many years that Raymond was incarcerated at the Pierce  
14 County Corrections, I visited him on a weekly basis and we discussed  
15 his case.
- 16 3. Raymond went through 3 trials on his homicide case. The first two  
17 resulted in mistrials. He was convicted in his third trial.
- 18 4. I recall that during the time that Raymond was incarcerated at the  
19 Pierce County Corrections that we often talked to him about the  
20 possibility of a plea offer from the prosecutor. Raymond discussed  
21 with us his wish that such an offer were to be made. All four of us  
22 were interested in some sort of plea offer.
- 23 5. Although Raymond and I often discussed his case and the details of  
24 upcoming trial strategies, he never told me that the prosecutor had  
25 made him any offer to reduce either the charge or the sentencing  
26 recommendation that the prosecutor would make to the judge in  
27 exchange for a guilty plea from Raymond. I believe that had such an  
offer been made to Raymond he would have discussed it in detail with  
me, our brother, Mike Garland and our mother, Margaret Cook, who  
was always intimately involved in the details of Raymond's case.  
Raymond depended upon all of us during the years he was  
incarcerated prior to his conviction and he relied on our opinions  
regarding his case.

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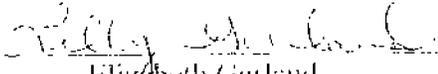
6. On the final day of Raymond's third trial, after he was convicted, I, my mother, and my mother were standing outside the courtroom. The prosecutors, Stephen Penner and Maureen Goodman were also outside. We all told the prosecutors that we had no hard feelings and we understood that they had merely been doing their jobs. Mr. Penner then asked us why we had not taken his plea offer. My mother exclaimed, "What plea offer?" Mr. Penner explained that he had offered to reduce the possible time that Raymond was facing if Raymond had pled to the charge. We all told Mr. Penner that we had never heard that such an offer had been given to Raymond and Mr. Penner suggested that we discuss this with Raymond's attorney, Barbara Corey.

7. There were many times that I accompanied my mother to Barbara Corey's office during the years that Ms. Corey represented Raymond. We discussed many aspects of trial strategy and issues related to the case because my mother was deeply involved in every aspect of the case against Raymond. At no time did Ms. Corey ever mention that there had been a plea offer to Raymond by the prosecutor.

8. Ms. Corey was always in favor of taking Raymond's case to trial. She always told us that Ray had a very strong case and that the prosecutor's case was weak.

9. I swear under penalty of perjury under the laws of the State of Washington that the aforementioned statement is true and correct.

Signed in Thurston County on the 20<sup>th</sup> day of April, 2015.

  
Elizabeth Garland  
22721 149<sup>th</sup> Ave. E  
Graham, WA 98338  
(253) 720-4092

## BACKLUND & MISTRY

June 26, 2015 - 12:31 PM

### Transmittal Letter

Document Uploaded: 3-451654-Reply Brief.pdf

Case Name: In re the Personal Restraint of Raymond Garland

Court of Appeals Case Number: 45165-4

**Is this a Personal Restraint Petition?** Yes  No

### The document being Filed is:

Designation of Clerk's Papers Supplemental Designation of Clerk's Papers

Statement of Arrangements

Motion: \_\_\_\_\_

Answer/Reply to Motion: \_\_\_\_\_

Brief: Reply

Statement of Additional Authorities

Cost Bill

Objection to Cost Bill

Affidavit

Letter

Copy of Verbatim Report of Proceedings - No. of Volumes: \_\_\_\_\_

Hearing Date(s): \_\_\_\_\_

Personal Restraint Petition (PRP)

Response to Personal Restraint Petition

Reply to Response to Personal Restraint Petition

Petition for Review (PRV)

Other: \_\_\_\_\_

### Comments:

No Comments were entered.

Sender Name: Manek R Mistry - Email: [backlundmistry@gmail.com](mailto:backlundmistry@gmail.com)

A copy of this document has been emailed to the following addresses:

[pccpatcecf@co.pierce.wa.us](mailto:pccpatcecf@co.pierce.wa.us)

[steve.trinen@co.pierce.wa.us](mailto:steve.trinen@co.pierce.wa.us)