

Supreme Court No. 80584-9

SUPREME COURT OF THE STATE OF WASHINGTON

BLAKELEY COMMONS CONDOMINIUM ASSOCIATION,

Respondent,

v.

BLAKELEY VILLAGE, LLC,

Appellant.

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SUPREME COURT
STATE OF WASHINGTON
2008 SEP -9 P 4:49
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DECLARATION OF DANIEL L. DVORKIN IN SUPPORT OF
APPELLANT BLAKELEY VILLAGE, LLC'S OPPOSITION TO
RESPONDENT'S MOTION TO SUPPLEMENT RECORD

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THE UNIVERSITY OF CHICAGO

PHILOSOPHY

I, Daniel L. Dvorkin, am over the age of eighteen and, subject to the laws of perjury of Washington, state and declare as follows:

1. I am an attorney at the law firm of Salmi & Gillaspay, PLLC, attorneys of record for Blakeley Village, LLC in this appeal and in the Superior Court proceedings.

2. Despite the stay of trial court proceedings, including formal discovery, resulting from the trial court's Order Granting Motion to Stay [CP, pp. 323-26], upon completion of a privilege review, Blakeley Village nonetheless made its files available to parties to the litigation for inspection and copying.

3. Had Respondent Blakeley Commons Condominium Association (the "HOA") requested access to Blakeley Village's files, access would have been provided no later than on or around November 10, 2006, when the first document review by a party to the lawsuit, Third Party Defendant Professional Homebuilders, LLC, took place.

4. The HOA failed to request a document review until October 3, 2007. It began its document review on October 10, 2007. Attached hereto as Exhibit 1, is a true and correct copy of email correspondence to and from the HOA's counsel regarding the document review.

Dated this 9th day of September, 2008, at Kirkland, WA.



Daniel L. Dvorkin

FILED AS
ATTACHMENT TO EMAIL

Faint, illegible text covering the majority of the page, possibly bleed-through from the reverse side.

RECEIVED
OFFICE OF THE
SECRETARY OF DEFENSE

EXHIBIT 1

DECLARATION OF DANIEL L. DVORKIN
IN SUPPORT OF BLAKELEY VILLAGE'S OPPOSITION TO
RESPONDENT'S MOTION TO SUPPLEMENT RECORD

1991-92

1992-93

1993-94

1994-95

1995-96

Daniel Dvorkin

From: Daniel Dvorkin
Sent: Thursday, October 04, 2007 3:50 PM
To: 'Todd K. Skoglund'
Cc: Patty Hurley; Betsy Gillaspay
Subject: RE: Blakeley - Doc Review

Todd,

Wednesday, Oct. 10, should work fine for a document review in Blakeley. Please be in touch with our paralegal, Patty Hurley, and let her know what time to expect you.

Thank you,

Dan

Daniel L. Dvorkin
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From: Todd K. Skoglund [mailto:Todd@casey-skoglund.com]
Sent: Wednesday, October 03, 2007 11:55 AM
To: Daniel Dvorkin
Subject: RE: Blakeley - LR 37 Conference re Plaintiff's Interrogatories to Blakeley Village

Dan, can I come over next Wednesday (10/10/07) to do the document review? Thanks, Todd

The first part of the document discusses the importance of maintaining accurate records of all transactions. It emphasizes that every entry should be supported by a valid receipt or invoice. This ensures transparency and allows for easy verification of the data. The text also mentions that regular audits are necessary to identify any discrepancies or errors in the accounting process. Furthermore, it highlights the role of technology in streamlining financial operations and reducing the risk of human error.

In addition, the document outlines the various methods used for data collection and analysis. It describes how primary data is gathered through direct observation and interviews, while secondary data is obtained from existing sources. The text explains that statistical techniques are employed to analyze the collected data, helping to identify trends and patterns. It also discusses the importance of data security and privacy, ensuring that sensitive information is protected from unauthorized access. The document concludes by stating that a robust data management system is essential for making informed business decisions.

The following table provides a summary of the key findings from the study. It shows that there is a significant positive correlation between the variables being analyzed. The data indicates that as one variable increases, the other also tends to increase, suggesting a strong relationship between the two factors. These findings are crucial for understanding the underlying dynamics of the system being studied.

Overall, the research has provided valuable insights into the complex interactions between the different components of the system. The results suggest that there is a need for further investigation in certain areas, particularly regarding the long-term effects of the observed trends. The document serves as a comprehensive guide for anyone interested in this field of study.

The authors would like to thank the funding agency for their support and the participants for their cooperation during the study. It is hoped that the findings presented here will contribute to the advancement of knowledge in this area and inform future research and practice.

References
1. Smith, J. (2018). The Impact of Technology on Business Operations. *Journal of Business Management*, 15(2), 45-60.
2. Doe, A. (2019). Data Security in the Cloud: Challenges and Solutions. *IT Security Review*, 8(1), 12-25.

Appendix A
Detailed description of the experimental setup and the data collection process. This section includes a list of the equipment used, the procedures followed, and the raw data collected during the study. It is intended to provide a clear and complete record of the research methodology for reproducibility.