

5
6 SUPERIOR COURT OF WASHINGTON FOR KING COUNTY
7

8 RIDE THE DUCKS SEPTEMBER 24, 2015
9 AURORA BRIDGE COLLISION

No. 15-2-28905-5 SEA
(ALL CASES)

10 DECLARATION OF KAREN
11 KOEHLER IN SUPPORT OF THE
12 DINH PLAINTIFF GROUP'S
13 OPPOSITION TO DEFENDANT RIDE
14 THE DUCKS OF SEATTLE LLC'S
15 MOTION IN THE ALTERNATIVE
16 FOR PROTECTIVE ORDER

17 KAREN KOEHLER makes the following declarations:

- 18 1. My name is Karen Koehler. I am lead attorney for the Dinh Plaintiff Group.
- 19 2. I incorporate by reference my declaration dated May 1, 2017 and filed in response
20 to defendant RTD Seattle' motion for reconsideration.
- 21 3. I have been a member in good standing with the Washington State Bar for 31
22 years.

1 4. I have handled numerous high profile cases that have been reported in the
2 mainstream media over the years. I believe strongly in the first amendment, in freedom of the
3 press, and that these principles co-exist perfectly well with the civil legal system.

4 5. I developed relationships with journalists, reporters, and news staff directors well
5 before this case came to pass. I consider several reporters to be true friends. I often chat
6 informally as a resource for reporters off the record explaining legal principles on cases that I
7 am not involved in or quoted in. I believe it is my obligation to help educate the public
8 regarding our legal world. I also greatly enjoy the intelligence and personalities of those who
9 work in the news industry.

10 6. In 2009 after I completed my term as president of the state trial lawyers'
11 association (now WSAJ), I created a blog whose mission was to show that: lawyers are real
12 people too. It also provided resources for those in the plaintiff bar. At the same time I was
13 inspired by my three daughters who were enthralled with social media. I joined them and
14 became a prolific user of twitter, Instagram, Facebook, snapchat, Linkedin and that does not
15 include platforms that have fallen by the wayside like myspace and vine.

16 7. Reporters follow my social media accounts and on occasion are inspired to write a
17 story about something that I have mentioned.

18 8. Though I like social media and the press there has never been any question but
19 that my number one focus and duty is to passionately advocate on behalf of my clients.

20 9. Last month we brought the motion to compel financial information in good faith
21 and included the necessary facts so that this Court could understand the basis for the request.

22 The motion was not a vehicle to circumvent the Court's Order limiting disclosure of discovery.

1 The motion was brought only after we had tried to work this matter out with RTDS pursuant to
2 CR 26i.

3 10. The insinuations and accusations by RTDS that I have behaved improperly or
4 perhaps unethically in speaking with the media – amount to bully tactics.

5 11. The facts and procedural history as set forth in the Dinh Plaintiff Group’s
6 opposition to this latest motion for protective order, are true and accurate.

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

9 DATED this 3rd day of May, 2017 in Seattle, Washington.

10 STRITMATTER KESSLER WHELAN
11 KOEHLER MOORE KAHLER

12 /s/ Karen K. Koehler
13 Karen K. Koehler, WSBA #15325

CERTIFICATE OF SERVICE

I hereby certify that on May 3, 2017, I delivered a copy of the document to which this certification is attached for delivery to all counsel of record via electronic filing and/or email.

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CERTIFICATE OF SERVICE- 2

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10 DATED this 3rd day of May, 2017.

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13 /s/ Jessica A. McClure
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