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The Honorable Ricardo S. Martinez

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

STATE OF WASHINGTON,

NO. CV04-2171RSM

Plaintiff,

v.

DECLARATION OF
KATHERINE M. TASSI

**ARLENE SEDIQZAD, also known as
ARLENE GRANT and ARLENE
HUNZIKER, manager of AVTECH
DIRECT, individually and on behalf of
her marital community; and GARY
HUNZIKER, manager of AVTECH
DIRECT, individually and on behalf of
his marital community; MD&I
CORPORATION, a California for-profit
corporation; and MIN HUI ZHAO, also
known as MICHAEL ZHAO,
individually, and on behalf of his marital
community,**

Defendants.

I, Katherine M. Tassi, hereby declare under penalty of perjury under the laws of the state of Washington that the following to be true and correct:

1. I am over the age of eighteen; an attorney of record for the State in this matter, and have personal knowledge of the facts in this declaration.
2. I am a resident of the State of Washington and my business address is 900 4th Avenue, Suite 2000, Seattle, King County, Washington 98164.

- 1 3. I am an Assistant Attorney General with the Office of the Attorney General, Consumer
2 Protection Division and have been assigned to the above-entitled case.
- 3 4. Plaintiff served Defendants AvTech Direct, Arlene Grant, Gary Hunziker, Michael Zhao,
4 and MD&I Corporation with Interrogatories and Requests for Production on August 16,
5 2005. Michael Zhao and MD&I Corporation requested from Plaintiff additional time to
6 respond to the requests. Plaintiff received Zhao and MD&I's responses on September 29,
7 2005. Plaintiff received interrogatory responses and a very limited number of documents
8 from AvTech and Ms. Grant on September 20, 2005. Ms. Grant informed Plaintiff that the
9 rest of the documents would be forthcoming. Plaintiff has not received any discovery to
10 date from Mr. Hunziker. Plaintiff conferred with Mr. Hunziker pursuant to Local Rules
11 W.D.Wash. 37(a)(2)(A) regarding his discovery obligations. Plaintiff re-sent the discovery
12 requests to Mr. Hunziker on November 22, 2005, and has yet to receive any response from
13 him. On November 21, 2005, Plaintiff received the remainder of the documents from
14 AvTech and Ms. Grant. On October 4, 2005, Plaintiff took Ms. Grant's deposition, and on
15 October 5, 2005, Plaintiff took Mr. Zhao's deposition.

16
17 I swear under penalty of perjury that the foregoing is true and correct.

18
19 DATED this 15th day of December, 2005, in Seattle, Washington.

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22 /s/ Katherine M. Tassi
KATHERINE M. TASSI