

BEFORE THE HEARING EXAMINER OF THE CITY OF MERCER ISLAND

In Re The Appeal of:

PEARL REN,

Appellant,

v.

CITY OF MERCER ISLAND, a Washington State
municipality,

Respondent.

No. APL22-003

CITY OF MERCER ISLAND'S *UPDATED*
EXHIBIT LIST

The City of Mercer Island submits the following exhibits in the above-referenced matter,
currently set for hearing on September 24, 2024.

Exhibit No.	Description	Date	Bates No.
1	Permit 1909-076 (Demolition Permit)	May 29, 2020	0001 - 0005
2	Permit 2104-111	December 17, 2021	0006 - 0021
3	Email Anon to Customer Service Mailbox	August 9, 2022	0022
4	Email chain L. Tuttle to A. Van Gorp re 7430 dock	August 9-10, 2022	0023 - 0026
5	Additional email L. Tuttle to A. Van Gorp re Follow up on 7422 EMW Dock Project	August 10, 2022	0027 - 0028
6	Email L. Tuttle to A. Van Gorp re Boathouse with dock	August 11, 2022	0029 - 0030

Exhibit No.	Description	Date	Bates No.
7	Henderson Pile Cap Photos	August 16, 2022	0031 – 0036
8	Henderson Dock Photos	August 16, 2022	0037 – 0043
9	Email Anon to D. Henderson	August 22, 2022	0044
10	Email L. Tuttle to A. Van Gorp, Untitled	August 22, 2022	0045 – 0049
11	Email D. Cole to L. Tuttle	August 24, 2022	0050 – 0053
12	D. Cole Email D. Howe and K. Meyer re no cover until after site meeting	August 24, 2022	0054 – 0055
13	Email D. Howe to D. Cole re no cover until after site meeting	August 24, 2022	0056 – 0064
14	Email D. Howe to D. Cole re no cover until after site meeting	August 25, 2022	0065 – 0066
15	Trackit Print out – Permit #1909-076	September 6, 2019	0067
16	Stop Work Order and Correspondence	August 26, 2022	0068 – 0071
17	GIS Aerial 2017	March 2017	0072
18	GIS Aerial 1963	Winter 1963	0073
19	GIS Aerial 1946	1946	0074
20	Application Permit 1909-076	August 23, 2019	0075
21	Comment Permit 1909-076	October 15, 2019	0076
22	Application Permit 2104-111	April 8, 2021	0077 – 0078
23	Appeal Packet	September 8, 2022	0079 – 0084
24	Declaration of Noticing	September 4, 2024	0085 – 0089
25	Staff Report	September 13, 2024	0090 - 0095

The City reserves the right to seek admission of rebuttal exhibits after review of the Appellant's and Applicant's exhibits. The City further reserves the right to utilize documents identified by Appellant or Applicant, and to rely on and elicit testimony concerning any provision of the Revised Code of

1 Washington, Washington Administrative Code, or Mercer Island City Code.

2 DATED this 13th day of September, 2024.

3 MADRONA LAW GROUP, PLLC

4 By: /s/ Eileen M. Keiffer
5 Eileen M. Keiffer, WSBA No. 51598
6 14205 SE 36th Street
7 Suite 100, PMB 440
8 Bellevue, WA 98006
9 Telephone: (425) 201-5111
10 Email: eileen@madronalaw.com

11 **CITY OF MERCER ISLAND**
12 OFFICE OF THE CITY ATTORNEY

13 By: /s/ Bio Park
14 Bio Park, WSBA No. 36994
15 9611 SE 36th Street
16 Mercer Island, WA 98040
17 Telephone: (206) 275-7652
18 Email: bio.park@mercerisland.gov

19 Attorneys for City of Mercer Island

1 **DECLARATION OF SERVICE**

2 I, Reina McCauley, declare and state:

3 1. I am a citizen of the State of Washington, over the age of eighteen years, not a party to this
4 action, and competent to be a witness herein.

5 2. On the 13th day of September, 2024, I served a true copy of the foregoing **CITY OF**
6 **MERCER ISLAND’S UPDATED EXHIBIT LIST** on the following parties using the method of
7 service indicated below:
8

<p>9 Courtney Kaylor, WSBA #27519 10 McCullough Hill Leary, PS 11 701 5th Avenue, Suite 6600 12 Seattle, WA 98104 13 <i>Attorney for Appellant</i></p>	<p><input type="checkbox"/> First Class, U.S. Mail, Postage Prepaid <input type="checkbox"/> Legal Messenger <input type="checkbox"/> Overnight Delivery <input type="checkbox"/> Facsimile <input checked="" type="checkbox"/> E-Mail: courtney@mhseattle.com mwarnock@mhseattle.com</p>
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14 I declare under penalty of perjury under the laws of the State of Washington that the foregoing
15 is true and correct.

16 DATED this 13th day of September, 2024, at Whittier, California.

17
18 /s/Reina McCauley
19 Reina McCauley