

1 remained a member of the Co-op since that time. I continue to volunteer at the Co-op
2 regularly, as I have for many years.

3 3. From 1990 to 1994, I was a member of the Board of Directors of the Co-op. I am
4 familiar with the enactment in May 1993 of the Co-op's Boycott Policy. Underlying the
5 adoption of the Boycott Policy were several intentions, among them that (1) the Co-op
6 would be a follower with regard to boycotts that were already recognized—not a leader; (2)
7 the prior recognition of such boycotts would be national in scope; and (3) authority to
8 recognize boycotts would reside with the Co-op Staff—not the Board,

9 4. I am familiar with the enactment in July 2010 by the Board of a resolution to boycott
10 and divest from Israel, which I believe was improper and unlawful.

11 5. Although it was given no advance notice of the Board's plans to vote on the
12 proposal to boycott and divest from Israel, the Co-op community quickly caught wind of
13 the Board's improper action. Prompt requests were made by certain Co-op members to
14 rescind the resolution/policies, and the Board faced widespread criticism for its action.

15 6. It soon became clear to me, however, that the Board had no intention of rescinding
16 the resolution/policies. In an effort to avoid litigation and resolve our differences with the
17 Defendants informally, I and the other Plaintiffs sent a letter, dated May 31, 2011, to each
18 of the Defendants setting forth our position. A true and correct copy of that letter is
19 attached to the Declaration of Avi J. Lipman as Exhibit AA.

20 7. I am familiar with this litigation and have been and remain willing to learn more
21 about it. Indeed, I and the other Plaintiffs have been closely involved at every stage of our
22 ongoing dispute with the Defendants.

23 8. I and the other Plaintiffs have not surrendered our control of the litigation to our
24 attorneys.

25 9. I maintain a personal commitment to the action on the part of the Co-op.
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1 10. Through this lawsuit, I and the other Plaintiffs seek a remedy on behalf of the Co-
2 op, not ourselves personally.

3 11. I maintain an interest in this action that outweighs any personal interest I might
4 have in the outcome. In fact, I have no personal interest in the outcome of this litigation
5 insofar as I stand to gain nothing financially if we prevail.

6 12. At some point after the summer of 2010, I and the other Plaintiffs sought out the
7 assistance of a pro-Israel charitable organization (StandWithUs) in an effort to contest the
8 Board's unlawful actions. Unlike the Board members, we did not have an organization
9 like Boycott, Divestment and Sanctions ("BDS")—an international alliance of anti-Israel
10 political organizations—to help us. Our communication with StandWithUs resulted from
11 frustration and exhaustion at being ignored, derided, and ultimately brushed aside by the
12 Defendants. I and the other Plaintiffs, however, are not "pawns" of StandWithUs or any
13 other organization. Although I am not a lawyer, I believe we are the "real parties in
14 interest" on behalf of the Co-op. I have not communicated with anyone from
15 StandWithUs since 3/28/11.

16 13. After the Board's improper and unlawful enactment of the Israel Boycott and
17 Divestment resolution/policies, a number of Co-op members either cancelled their
18 memberships or otherwise stopped shopping at the Co-op in protest.

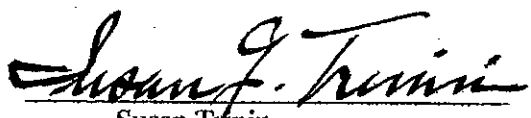
19 14. "Voter turnout" for the Co-op's Board elections in November 2010 was greater for
20 the five candidates endorsed by BDS because BDS activists at the Evergreen State
21 College campus had recruited and then carpooled students to the Co-op to become
22 members for the express purpose of endorsing the Israel Boycott and Divestment
23 resolution/policies.

24 15. I and the other Plaintiffs have received significant support from other Co-op
25 members since we filed suit against the Defendants, and I believe we "fairly and
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adequately” represent those members who oppose the Board’s improper and unlawful enactment of the Israel Boycott and Divestment resolution/policies.

Dated this 30th day of November, 2011.


Susan Tymin