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KING COUNTY SUPERIOR COURT CLERK E-FILED CASE NUMBER: 06-2-24906-2 SEA

## SUPERIOR COURT OF WASHINGTON FOR THE COUNTY OF KING

V&E MEDICAL IMAGING SERVICES, INC., a Washington corporation, doing business as AUTOMATED HOME SOLUTIONS,

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Plaintiff,

vs.

VS.

MARK DECOURSEY and CAROL DECOURSEY, husband and wife, individually and the marital community composed thereof,

Defendants/Third Party Plaintiffs,

, et al.,

Third Party Defendants.

NO. 06-2-24906-2 SEA

DECLARATION OF PAMELA A. OKANO IN SUPPORT OF MOTION FOR LEAVE TO DEPOSIT PORTION OF JUDGMENT PAYMENT INTO COURT REGISTRY

I, Pamela A. Okano, declare,

1. William R. Hickman, of counsel at the law firm of Reed McClure was the attorney representing judgment debtors/third party defendants Paul H. Stickney, Paul H. Stickney Real Estate Services, Inc., and Windermere Real Estate, S.C.A., Inc., on appeal and in making arrangements to satisfy the judgment against them. Mr. Hickman has asked me to finalize the arrangements for satisfying the judgment. I am an attorney at Reed McClure.

2. In 2008 and 2009, this court entered a series of judgments against judgment debtors in this action.

3. Judgment debtors appealed to Division I of the Washington State Court of Appeals. In a November 8, 2010, unpublished decision, the Court of Appeals affirmed in part, reversing and remanding only with respect to the calculation of costs.

DECLARATION OF PAMELA A. OKANO IN SUPPORT OF MOTION FOR LEAVE TO DEPOSIT PORTION OF JUDGMENT PAYMENT INTO COURT REGISTRY- 1

REED MCCLURE ATTORNEYSATLAW TWO UNION SQUARE 601 UNION STREET, SUITE 1500 SEATTLE, WASHINGTON 98101-1363 (206) 292-4900 FAX (206) 223-0152

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4. The Washington Supreme Court denied judgment debtors' petition for review. The mandate in the appeal issued on October 12, 2011.

5. Remand to recalculate costs is no longer necessary as the parties, judgment debtors and judgment creditors, have, through their attorneys, agreed on a cost amount.

6. The parties have agreed that the amount to satisfy the judgments will be \$1,045,856.50 plus interest.

7. In August 2011, the Lane Powell law firm, the judgment creditors' attorneys, withdrew from the case and filed a notice of attorney lien in the amount of \$384,881.66.

8. At the request of the attorney for the judgment creditors, Michele Earl-Hubbard, judgment debtors, through their attorneys, have agreed that the amount of the attorney fee lien should be deposited in the registry of this court, pending resolution of the attorney fee dispute between judgment creditors and Lane Powell. Judgment creditors and judgment debtors have also agreed that upon depositing that sum into the registry of the court, judgment creditors will file a partial or full satisfaction of judgment, whichever is appropriate.

9. Judgment debtors are arranging to have the balance of the amount necessary to satisfy the judgments paid to judgment creditors directly, in two installments. Both installments should be paid no later than November 15, 2011.

10. Permitting the amount of the attorney fee lien to be deposited in the registry of the court at this time would permit judgment debtors to obtain a full satisfaction of judgment as timely as possible, without having to await resolution of the attorney fee dispute between the judgment creditors and Lane Powell.

DECLARATION OF PAMELA A. OKANO IN SUPPORT OF MOTION FOR LEAVE TO DEPOSIT PORTION OF JUDGMENT PAYMENT INTO COURT REGISTRY-2

REED MCCLURE ATTORNEYSATLAW TWO UNION SQUARE 601 UNION STREET, SUITE 1500 SEATTLE, WASHINGTON 98101-1963 (206) 292-4900 FAX (206) 223-0152

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I declare under penalty of perjury under the laws of the state of Washington that the foregoing is true and correct.

Dated this \_\_\_\_\_ day of November, 2011, at Seattle, Washington.

Parnel & Obam

Pamela A. Okano

## REED MCCLURE

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