



SUPERIOR COURT OF WASHINGTON FOR PIERCE COUNTY

9 KEVIN DOLAN and a class of similarly)
10 situated individuals,)
11 Plaintiffs,)
12 v.)
13 KING COUNTY, a political subdivision of)
14 the State of Washington,)
15 Defendant.)

NO. 06-2-04611-6

STIPULATION AND ORDER

STIPULATION

17 In its class certification made of September 15, 2006, the Court reserved ruling on
18 whether the class should include the following individuals:

19 All W-2 employees of the King County public defender agencies and any former
20 or predecessor King County public defender agencies who have not worked for
21 one of the King County public defender agencies within three years of the filing
22 of this lawsuit but who work or have worked in a PERS-eligible position within
23 three years of the filing of this lawsuit.

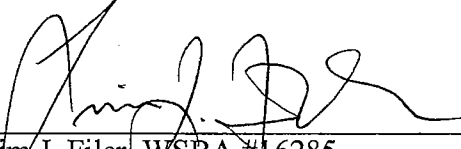
24 The parties now agree that those individuals (the Additional Class Members) should be
25 included in the class. The parties agree that this stipulation is made without prejudice to any of
26 King County's contentions regarding or defenses to the claims of the Additional Class
27 Members, whether individually or as a groups, including, without limitation, King County's

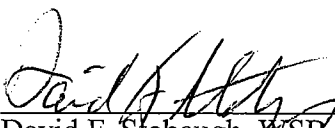
1 statute of limitations defense. All such contentions and defenses are reserved for future
2 resolution.

3 DATED this 19th day of June, 2012.

4 FOSTER PEPPER PLLC

BENDICH, STOBAUGH & STRONG, P.C.

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6 
7 Tim J. Filer, WSBA #16285
8 P. Stephen DiJulio, WSBA #7139
9 Kathryn Carder McCoy, WSBA No. 38210
Attorneys for King County

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6 
7 David F. Stobaugh, WSBA #6376
8 Lynn S. Prunhuber, WSBA #10704
9 Stephen K. Strong, WSBA #6299
Attorneys for Plaintiff and the Class

10 **ORDER**

11
12 It is so ordered. The class is now defined as:


13 All W-2 employees of the King County public defender agencies and any
14 former or predecessor King County public defender agencies who work or
15 have worked for one of the King County public defender agencies within
16 three years of the filing of this lawsuit.

17 and

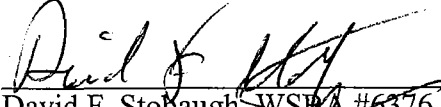
18 All W-2 employees of the King County public defender agencies and any
19 former or predecessor King County public defender agencies who have not
20 worked for one of the King County public defender agencies within three
21 years of the filing of this lawsuit but who work or have worked in a PERS-
22 eligible position within three years of the filing of this lawsuit.

23 This order is without prejudice to any of King County's contentions regarding or
24 defenses to the claims of the Additional Class Members, whether individually or as a groups,
25 including, without limitation, King County's statute of limitations defense, all of which are
26 reserved for future resolution without deciding whether there are any such defenses.
27

1 DATED this 19 day of June, 2012.

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4 
The Honorable John R. Hickman
Superior Court Judge

5 Stipulation Approved, Order Presented By:
6 BENDICH, STOBAUGH & STRONG, P.C.

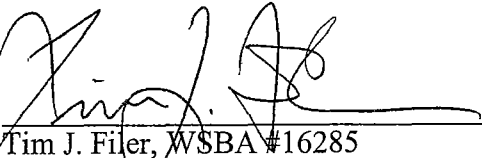
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11 *Attorneys for Plaintiff & the Class*

FILED
DEPT. 22
IN OPEN COURT

JUN 19 2012

Pierce County Clerk
By..... CJM
DEPUTY

12 Stipulation Approved; Order Approved For Entry:

13 FOSTER PEPPER PLLC
14 
15
16 Tim J. Filer, WSBA #16285
17 P. Stephen DiJulio, WSBA #7139
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