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4 **IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON**  
5  
6 **IN AND FOR THE COUNTY OF ISLAND**

7  
8 **ROBERT WILBUR and DUSTIN**  
9 **FREDERICK,**  
10 **Plaintiffs,**  
11 **vs.**  
12 **ADMIRAL'S COVE BEACH CLUB, a**  
13 **Washington non-profit corporation**  
14 **Defendant.**

15 \_\_\_\_\_  
16 **SUE CORLISS,**  
17 **Intervenor,**  
18 **vs.**  
19 **DUSTIN FREDERICK, ROBERT**  
20 **WILBUR, ADMIRAL'S COVE BEACH**  
21 **CLUB, a Washington non-profit**  
22 **corporation, and its BOARD OF**  
23 **DIRECTORS.**  
24 **Defendants.**

**NO. 13-2-00741-4**

**DECLARATION OF ROBERT**  
**WILBUR IN SUPPORT OF**  
**MOTION FOR LEAVE TO**  
**AMEND COMPLAINT**

25 **UNDER PENALTY OF PERJURY AND PURSUANT TO THE LAWS OF THE**  
26 **STATE OF WASHINGTON, I CERTIFY THAT THE FOLLOWING IS TRUE AND**  
27 **CORRECT:**

28 My name is Robert Wilbur and I am one of the Plaintiffs in the above captioned  
29 case. I am over the age of 18 years and competent to be a witness. This declaration  
30 is submitted in support of my request for leave to amend the Complaint that I filed in  
31 this case. Specifically, I would like to amend my complaint to add a request for  
32 declaratory relief and judgment establishing that the vote of the members of the  
Admiral's Cove Beach Club that took place in March of 2016, is a decision that

DECLARATION OF ROBERT WILBUR IN  
SUPPORT OF MOTION TO AMEND  
COMPLAINT  
Page 1

LAW OFFICES OF  
**Christon C. Skinner P.S.**  
791 SE Barrington Drive  
Oak Harbor WA 98277  
Tel. (360) 679 1240 · Fax (360) 679 9131

1 supersedes and replaces any prior member or board decisions relating to the  
2 swimming pool and its repair, maintenance, preservation or demolition. I am also  
3 asking the court to delete certain provisions of the Complaint that are no longer  
4 germane in light of the court of appeals decision issued in this proceeding in August of  
5 2016.

6 This declaration is based on my personal knowledge of the facts. I am over the  
7 age of eighteen years and competent to be a witness.

8 The facts described in Section III of my Motion for Leave to Amend the  
9 Complaint in this case are true and correct to the best of my knowledge. Rather than  
10 restating those same facts in this declaration, I am incorporating, by this reference, the  
11 factual statements contained in Section III of the motion as if fully set forth in this  
12 declaration.

13 No trial is scheduled in this case. I do not believe that any party will be  
14 prejudiced or surprised and unable to prepare their case if the court allows the  
15 amendment to my original Complaint in the manner that I am proposing. A copy of the  
16 proposed amended complaint is attached to the motion requesting leave to amend.  
17

18 Dated this \_\_\_ day of February, 2017, at Oak Harbor, Washington.  
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24 See attached  
25 ROBERT WILBUR  
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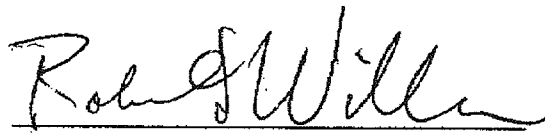
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12 factual statements contained in Section III of the motion as if fully set forth in this  
13 declaration.

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15 No trial is scheduled in this case. I do not believe that any party will be  
16 prejudiced or surprised and unable to prepare their case if the court allows the  
17 amendment to my original Complaint in the manner that I am proposing. A copy of the  
18 proposed amended complaint is attached to the motion requesting leave to amend.

19 Dated this 22 day of February, 2017, at Oak Harbor, Washington.  
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24 ROBERT WILBUR  
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6 IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON

7 IN AND FOR THE COUNTY OF ISLAND

8  
9 ROBERT WILBUR,  
10 Plaintiffs,

11 vs.

12 ADMIRAL'S COVE BEACH CLUB, a  
13 Washington non-profit corporation; and  
14 JEAN SALLS, MARIA CHAMBERLAIN,  
15 KAREN SHAAK, ROBERT PEETZ,  
16 ELSA PALMER, ED DELAHANTY AND  
17 DAN JONES, individuals,

18 Defendants.

19 \_\_\_\_\_  
20 SUE CORLISS,

21 Intervenor,

22 vs.

23 DUSTIN FREDERICK, ROBERT  
24 WILBUR, ADMIRAL'S COVE BEACH  
25 CLUB, a Washington non-profit  
26 corporation, and its BOARD OF  
27 DIRECTORS.

28 Defendants.

NO. 13-2-00741-4

GR 17 DECLARATION

29 UNDER PENALTY OF PERJURY AND PURSUANT TO THE LAWS OF THE  
30 STATE OF WASHINGTON, I CERTIFY THE FOLLOWING TO BE TRUE AND  
31 CORRECT:

32 I, Linda Williams, am assistant to Christon C. Skinner who is the attorney of  
record for the plaintiffs herein. I received a document entitled Declaration of Robert  
Wilbur In Support of Motion For Leave To Amend Complaint from Robert Wilbur by  
facsimile.

GR 17 Declaration - p.1

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1 I further declare that prior to signing this affidavit, I did examine the document,  
2 determined that it consisted of two pages and that the document was complete and  
3 legible.

4 DATED this 22nd day of February, 2017, at Oak Harbor, Washington.  
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8 Linda Williams  
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