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KING COUNTY DEPARTMENT OF EXECUTIVE SERVICES INQUEST PROGRAM

In re INQUEST INTO THE DEATH OF
CHARLEENA LYLES,

NO. 517IQ9301

PLAINTIFF'S IDENTIFICATION OF
UNDERLYING MATERIALS
PROVIDED TO EXPERTS

The Plaintiffs are providing the following list which in and of itself is not confidential. The list summarizes the materials provided to expert Bauer and Hayes in the underlying civil litigation.

The vast majority of this information was provided by the City both in public records requests and answers to discovery. Both of the officers were represented by Bob Christie law firm which also had the vast majority of this information. Ted Buck's office may if it hasn't already procured the discovery from Christie's law firm.

The highlighted materials below are those which contain confidential information.

Materials Provided to Expert Bauer

- Second Amended Complaint
- Medical Examiner File, includes Investigator's Report; Toxicology Report; Autopsy Report; and Autopsy Diagram
- Diagrams of Apartment and Scene by Seattle Police Department CSI Unit
- Photographs: Scene; CSI Evidence; CSI Knives; CSI Panorama Scene; CSI Knives, Shell Casings, and Recovered Rounds; CSI Scene; FIT (Force Investigation Team) Photos: Anderson Sketch, Cell Phone, McNew Follow up Sketch; McNew Sketch, McNew Walk-through, Officer Anderson, Officer Anderson Taser, Officer McNew, Round Count Officer Anderson, and Round Count Officer McNew
- Seattle Police Department Crime Scene Investigation Report and Diagrams
- Seattle Police Department - Force Review Board Findings Report Regarding Officer Involved Shooting
- Seattle Police Department Force Investigation Report
- Statements from Involved Officers: Public Safety Statement by Officer McNew; Public Safety Statement by Officer Anderson; Officer Steven A. McNew, Statement; Officer Steven A. McNew, Follow-up Statement; Officer Jason M. Anderson, Statement-Part 1, Part 2, and Part 3; and Officer Jason M. Anderson, Follow up Statement
- Incident Summary by Officer Steven McNew
- Incident Summary by Officer Jason Anderson
- Seattle Police Department Transcribed Audio of Incident on June 18, 2017
- Audio and Video: Dashcam Audio; Dashcam Video; and Video of hallway
- Stipulated Protective Order Re: Discovery Materials
- Third Amended Complaint
- ME Photos
- Screen captures of laser scan files from the scene; and previous flythrough visualization(s)

Materials Provided to Whitehill

- FIT involved Officer Statements
- Documents from June 5, 2017 incident
- Mental Health records:
 - Sound Mental Health
 - Valley Cities Behavioral Health
- Solid Ground records
- Dep. of Jason Anderson (Vol. I & II and video)
- Dep. Of Stephen McNew and video
- Dep of Nathan Bauer
- Dep of Brandon Legg
- Dep of Davidson Lim

- FIT Report
- SPD Offense Report
- Lyles AVC sync by Bauer

Dated this 17th day of May, 2022.

/s/ Karen Koehler

Karen K. Koehler, WSBA #15325

Melanie Nguyen, WSBA #51724

STRITMATTER KESSLER KOEHLER MOORE

and

Edward H. Moore, WSBA #41584

LAW OFFICES OF EDWARD H. MOORE, PC

CERTIFICATION

I hereby certify that on May 17, 2022, I delivered a copy of the document to which this certification is attached for delivery to all parties of record as follows:

<p>Inquest Program Personnel Hon. Michael Spearman Claire Thornton Claire.Thornton@kingcounty.gov Dee Sylve Dee.Sylve@kingcounty.gov Matt Anderson Matt.Anderson@kingcounty.gov DES-Dept. of Executive Services 401 5th Ave., suite 131 Seattle, WA 98104</p>	<p><input type="checkbox"/> U.S. Mail (First Class and Certified) <input type="checkbox"/> Fax <input type="checkbox"/> Process Server <input checked="" type="checkbox"/> Electronic Delivery</p>
<p>Ghazal Sharifi, WSBA 47750 Ghazal.Sharifi@seattle.gov Rebecca Boatright Rebecca.Boatright@Seattle.gov Rebecca Widen Rebecca.widen@seattle.gov Seattle City Attorney's Office 701 5th Ave. Suite 2050 Seattle, WA 98104-7097 Counsel for City of Seattle re Inquest</p>	<p><input type="checkbox"/> U.S. Mail (First Class and Certified) <input type="checkbox"/> Fax <input type="checkbox"/> Process Server <input checked="" type="checkbox"/> Electronic Delivery</p>
<p>Ted Buck, WSBA #22029 tbuck@freybuck.com Karen Cobb, WSBA #34958 kcobb@freybuck.com Frey Buck, PS 1200 5th Ave, Suite 1900 Seattle, WA 98101 Counsel for Officers Anderson and McNew</p>	<p><input type="checkbox"/> U.S. Mail (First Class and Certified) <input type="checkbox"/> Fax <input type="checkbox"/> Process Server <input checked="" type="checkbox"/> Electronic Delivery</p>

/s/ Anne Roberson
 Anne Roberson
 anner@stritmatter.com