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7 IN THE DISTRICT COURT OF THE STATE OF WASHINGTON
8 KING COUNTY

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10 IN RE INQUEST INTO THE DEATH OF
11 CHARLEENA LYLES
12 .

No. 517IQ9301

DECLARATION OF GHAZAL SHARIFI IN
SUPPORT OF SEATTLE POLICE
DEPARTMENT'S MOTION TO STAY
INQUEST PENDING DISPOSITION OF
CIVIL ACTION

[Clerk's Action Required]

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15
16 I, GHAZAL SHARIFI, declare under penalty of perjury under the laws of the state of
17 Washington that I am over the age of 18, otherwise competent to testify, and that the following is true
18 and correct based upon my personal knowledge:

- 19 1. I am one of the Assistant City Attorneys representing the Seattle Police Department in
20 this Inquest.
21 2. A true and correct copy of a July 9, 2019 email exchange with the King County
22 Executive's Office is attached hereto as Exhibit 1.
23

DECLARATION OF GHAZAL SHARIFI IN SUPPORT OF SEATTLE
POLICE DEPARTMENT'S MOTION TO STAY INQUEST PENDING
DISPOSITION OF CIVIL ACTION- 1

Peter S. Holmes
Seattle City Attorney
701 5th Avenue, Suite 2050
Seattle, WA 98104-7095
(206) 684-8200

3. The undersigned counsel attempted to connect with Ms. Koehler regarding the general subject matter of the instant motion but did not receive a response call.

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

DATED this 9th day of September, 2019.

By: /s/ Ghazal Sharifi
Assistant City Attorney

CERTIFICATE OF SERVICE

I certify that on the 9th day of September, 2019, I caused a true and correct copy of this document to be served on the following in the manner indicated below:

Dee Sylve Inquest Program Manager DES-Dept. of Executive Services 401 5 th Ave., suite 131 Seattle, WA 98104 (206) 477-6191	(x) Electronic Delivery Dee.Sylve@kingcounty.gov
Matt Anderson Inquest Program Attorney DES-Dept. of Executive Services 401 5 th Ave., suite 131 Seattle, WA 98104 (206) 263-7568	(x) Electronic Delivery Matt.Anderson@kingcounty.gov
Karen Koehler Melanie Nguyen Lisa Benedetti 3600 15th Ave W Ste 300 Seattle, WA 98119-1330 (206) 448-1777 <i>[Attorneys for the Lyles Family]</i>	(x) Electronic Delivery Karenk@stritmatter.com Melanie@stritmatter.com Lisa@stritmatter.com elodie@stritmatter.com anner@stritmatter.com
Edward H. Moore Law Offices of Edward H Moore PC, Attorney for Lyles Estate 3600 15th Ave W Ste 300 Seattle, WA 98119-1330 (206) 826-8214 <i>[Attorneys for the Lyles Family]</i>	(x) Electronic Delivery emoore@ehmpc.com
Personal Representative of the Estate of Charleena Lyles Commissioner Eric Watness	(x) Electronic Delivery Ericwatness1@gmail.com
Corey Guilmette Public Defender Association	(x) Electronic Delivery corey.guilmette@defender.org

DECLARATION OF GHAZAL SHARIFI IN SUPPORT OF SEATTLE
POLICE DEPARTMENT'S MOTION TO STAY INQUEST PENDING
DISPOSITION OF CIVIL ACTION- 3

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110 Prefontaine Pl. S, Suite 502 Seattle, WA 98104-2626 (206) 392-0050 EXT 711 <i>[Attorneys for the Lyles Family]</i>	
Prachi Dave Public Defender Association 110 Prefontaine Pl. S, Suite 502 Seattle, WA 98104-2626 (610) 517-9062 <i>[Attorneys for the Lyles Family]</i>	(x) Electronic Delivery prachi.dave@defender.org
Karen Cobb Frey Buck, P.S. 1200 5th Ave, Ste 1900 Seattle, WA 98101-3135 (206) 486-8000 <i>[Attorney for Officer Steven McNew]</i>	(x) Electronic Delivery kcobb@freybuck.com
Ted Buck Frey Buck, P.S. 1200 5th Ave, Ste 1900 Seattle, WA 98101-3135 (206) 486-8000 Paralegals: Lisa Smith Matthew Kniffen Megan Riley <i>[Attorney for Officer Jason Anderson]</i>	(x) Electronic Delivery tbuck@freybuck.com lsmith@freybuck.com mkniffen@freybuck.com MRiley@freybuck.com
Rebecca Boatright Executive Director for Seattle Police Dept. Attorney for Chief Best Seattle City Attorney's Office 701 5th Ave Ste 2050 Seattle, WA 98104-7095	(x) Electronic Delivery Rebecca.Boatright@Seattle.gov

/s/ Jennifer Litfin
Jennifer Litfin, Legal Assistant

EXHIBIT 1

Order of Inquest into the death of Charleena Lyles

Sylve, Dee <Dee.Sylve@kingcounty.gov>

Tue 7/9/2019 1:04 PM

To: Sharifi, Ghazal <Ghazal.Sharifi@seattle.gov>

Cc: Stone, Gail <Gail.Stone@kingcounty.gov>

CAUTION: External Email

Ghazal,

Good afternoon. I am emailing on behalf of Gail. Gail is out of the office today.

Obet and Le are before Lyles. We called Obet on June 24th. Le was not called, at this time, due to the families wishes of wanting to focus their efforts on the civil trial that is already in progress. As a result, Lyles would have been the next one to call. Administrator Spearman and Matt Anderson are assigned and will be working on all 3 cases (Butts, Obet and Lyles). There will be some overlap of pre-conference hearings between Butts and Lyles as well as Obet, but the actual inquest hearings will be further apart due to Obet being before Lyles. We will all work together to ensure ample time and efficiency is given to each case.

Please let me know if you have any further questions or concerns.

Thank you,

Dee Sylve, MPA

Inquest Program Manager
DES-Dept. of Executive Services

401 5th Ave., suite 131

Seattle, WA 98104

Mailstop: CNK-DES-135

Phone: (206) 477-6191

Cell phone: (206) 351-9919

Email: Dee.Sylve@kingcounty.gov

From: "Sharifi, Ghazal" <Ghazal.Sharifi@seattle.gov>

Date: July 9, 2019 at 7:48:24 AM PDT

To: "Stone, Gail" <Gail.Stone@kingcounty.gov>

Cc: "Litfin, Jennifer M" <Jennifer.Litfin@seattle.gov>, "Nakata, Kelly" <Kelly.Nakata@seattle.gov>,
"Wolf, Jeff M" <Jeff.Wolf@seattle.gov>

Subject: Re: Order of Inquest into the death of Charleena Lyles

[EXTERNAL Email Notice!] External communication is important to us. Be cautious of phishing attempts. Do not click or open suspicious links or attachments.

Gail,

It was my understanding that we had a bit of time between *Butts* and *Lyles*. Have the other inquests, earlier in time than *Lyles* been called?

Thanks,
Ghazal

Ghazal Sharifi
Assistant City Attorney

Seattle City Attorney's Office
Civil Division – Police Action Team
701 Fifth Avenue, Suite 2050
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On Jul 9, 2019, at 6:32 AM, Stone, Gail <Gail.Stone@kingcounty.gov> wrote:

CAUTION: External Email

Attached please find Executive Constantine's Order of Inquest into the death of Charleena Lyles.

Gail Stone

she/her
Law & Justice Policy Advisor
King County Executive Dow Constantine
Office of Performance, Strategy, and Budget
401 5th Ave., Ste. 800
Seattle, WA 98104
206.263.9652
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Gail.Stone@kingcounty.gov

<Charleena Lyles - Exec Inquest Order 7-8-2019.pdf>