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IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON  
IN AND FOR THE COUNTY OF KING

THE PRESBYTERY OF SEATTLE, a  
Washington nonprofit corporation; THE  
FIRST PRESBYTERIAN CHURCH OF  
SEATTLE, a Washington nonprofit  
corporation; ROBERT WALLACE,  
President of The First Presbyterian Church  
of Seattle, a Washington nonprofit  
corporation; and WILLIAM  
LONGBRAKE, on behalf of himself and  
other similarly situated members of First  
Presbyterian Church of Seattle,

Plaintiffs,

v.

JEFF SCHULZ and ELLEN SCHULZ, as  
individuals and as the marital community  
comprised thereof; LIZ CEDERGREEN;  
DAVID MARTIN; LINDSEY  
McDOWELL; GEORGE NORRIS;  
NATHAN ORONA; and KATHRYN  
OSTROM, as former trustees of First  
Presbyterian Church of Seattle, a  
Washington nonprofit corporation,

Defendants.

No. 16-2-03515-9 SEA

DECLARATION OF HEIDI  
HUSTED ARMSTRONG IN  
SUPPORT OF PLAINTIFFS'  
MOTION FOR PARTIAL  
SUMMARY JUDGMENT

1 I, Heidi Husted Armstrong, pursuant to RCW 9A.72.085, declare as follow:

2 1. I am an ordained Minister of Word and Sacrament and a teaching elder in  
3 the Presbyterian Church (U.S.A.). I received my Master of Divinity degree from Fuller  
4 Theological Seminary in 1983 and a Doctor of Ministry in preaching from San Francisco  
5 Seminary in 2000. I have substantial experience serving in the role of an interim pastor. I  
6 have personal knowledge of the matters set forth in this declaration and am competent to  
7 testify about those matters.

8 2. On November 17, 2015, I was appointed by the Presbytery of Seattle as  
9 one of eight members on the Administrative Commission for First Presbyterian Church of  
10 Seattle. I have participated actively in the work of the Administrative Commission.

11 3. On February 16, 2016, the Administrative Commission adopted a series of  
12 resolutions, the fourth of which stated the following:

13 Whereas, the Administrative Commission for First Presbyterian Church of  
14 Seattle has assumed original jurisdiction with full power of the session of  
15 First Presbyterian Church of Seattle; now, therefore, be it

16 *Resolved*, That the Administrative Commission, acting as the session  
17 of First Presbyterian Church of Seattle, in accordance with resolutions  
18 previously adopted and pursuant to G-2.0504.b of the Constitution of the  
19 Presbyterian Church (U.S.A.), hereby appoints the Rev. Dr. Heidi Husted  
20 Armstrong as temporary pastor to serve the First Presbyterian Church of  
21 Seattle.

22 4. The Administrative Commission’s decision to appoint me as temporary  
23 pastor was based upon its finding that the former co-pastors of First Presbyterian Church  
24 of Seattle (“FPCS”) had renounced the jurisdiction of the church in December 2015,  
25 leaving the congregation without a pastor. The Administrative Commission also  
determined that the conduct of the former co-pastors and the former ruling elders had  
caused a schism within the congregation and that the true church consisted of those who

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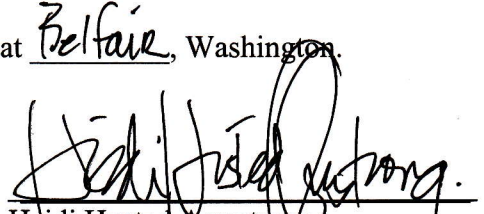
opposed the actions of the former co-pastors and the former ruling elders. The Administrative Commission recognized its obligation, acting as the session of FPCS, to (a) provide that the Word of God may be truly preached and heard, (b) provide that the Sacraments may be rightly administered and received, and (c) nurture the covenant community of disciples of Christ. These responsibilities and powers of the session are set forth in G-3.0201 of the Constitution of the Presbyterian Church (U.S.A.).

5. Each Sunday since my appointment, I have led a worship service for the true church at FPCS. I have also reached out to FPCS congregants to offer pastoral care.

6. The former co-pastors and former ruling elders have refused to recognize the jurisdiction of Seattle Presbytery or the findings and decisions of the Administrative Commission. They have blocked access to the church facilities, requiring me to conduct worship services at other locations.

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

EXECUTED this 9 day of March 2016 at Belfair, Washington.

  
Heidi Husted Armstrong