

The Honorable Patrick Oishi
Motion for Summary Judgment
Hearing: April 15, 2015, 10:00 a.m.

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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 DOUG KELLY
IN SUPPORT OF PLAINTIFFS'
MOTION FOR PARTIAL
SUMMARY JUDGMENT

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I, Doug Kelly, pursuant to RCW 9A.72.085, declare as follows:

1. I am over the age of eighteen, have personal knowledge of the matters set forth in this declaration, and am competent to testify about them.

2. I am the Pastor and Head of Staff at Bethany Presbyterian Church in Seattle. I hold a Bachelor of Arts degree from the University of California at Berkeley, a Master of Divinity degree from Princeton Theological Seminary, and a Doctor of Ministry degree from Columbia Theological Seminary.

3. On November 8, 2015, I participated in the worship service held at First Presbyterian Church of Seattle ("FPCS"). This was a joint worship service with members of FPCS, Bethany Presbyterian Church, Mount View Presbyterian Church, and Emerald City Bible Fellowship all in attendance. After the service, there was a large fellowship lunch, after which the attendees dispersed.

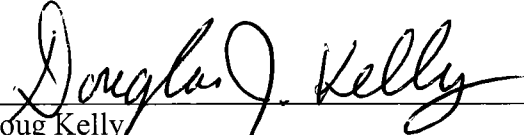
4. During the service on November 8, there was no mention of a FPCS congregational meeting to be held the following Sunday, November 15, 2015. There was no public notice given, in either printed or verbal form, of such a meeting.

5. Our church assumed responsibility for preparing and printing the bulletins for the joint service on November 8, 2015. A true copy of the bulletin for the November 8, 2015, service of worship at FPCS (featuring the theme, "Be One") is attached as **Exhibit A**. As **Exhibit A** confirms, the bulletin did not include a printed notice, signed by the Clerk of Session, stating the date and hour when, and the place where, a meeting of the FPCS corporation would be held, nor was any such notice audibly read at public worship to the assembled congregation on November 8, 2015.

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

EXECUTED this 9th day of March 2016 at Seattle, Washington.



Doug Kelly

EXHIBIT A

JOHN 17: 20-26 (NIV)

"My prayer is not for them alone. I pray also for those who will believe in me through their message, that all of them may be one, Father, just as you are in me and I am in you. May they also be in us so that the world may believe that you have sent me. I have given them the glory that you gave me, that they may be one as we are one - I in them and you in me - so that they may be brought to complete unity. Then the world will know that you sent me and have loved them even as you have loved me.

"Father, I want those you have given me to be with me where I am, and to see my glory, the glory you have given me because you loved me before the creation of the world.

"Righteous Father, though the world does not know you, I know you, and they know that you have sent me. I have made you known to them, and will continue to make you known in order that the love you have for me may be in them and that I myself may be in them."

2 CHRONICLES 7: 12-18 (NIV)

The Lord appeared to him at night and said: "I have heard your prayer and have chosen this place for myself as a temple for sacrifices. When I shut up the heavens so that there is no rain, or command locusts to devour the land or send a plague among my people, if my people, who are called by my name, will humble themselves and pray and seek my face and turn from their wicked ways, then I will hear from heaven, and I will forgive their sin and will heal their land. Now my eyes will be open and my ears attentive to the prayers offered in this place. I have chosen and consecrated this temple so that my Name may be there forever. My eyes and my heart will always be there.

"As for you, if you walk before me faithfully as David your father did, and do all I command, and observe my decrees and laws, I will establish your royal throne, as I covenanted with David your father when I said, 'You shall never fail to have a successor to rule over Israel!'

TODAY'S OFFERING

Checks can be written to individual churches. All undesignated cash and other gifts will be split between the Kenney Bui Scholarship Fund and Seattle Public Schools' Work Day. The Scholarship fund is in honor of the Evergreen football player who died tragically this past October, and will be awarded to a scholar athlete from the Highline School District. The Seattle School Work day will be in Summer 2016, and will partner local churches with schools in hopes of connecting the community together.

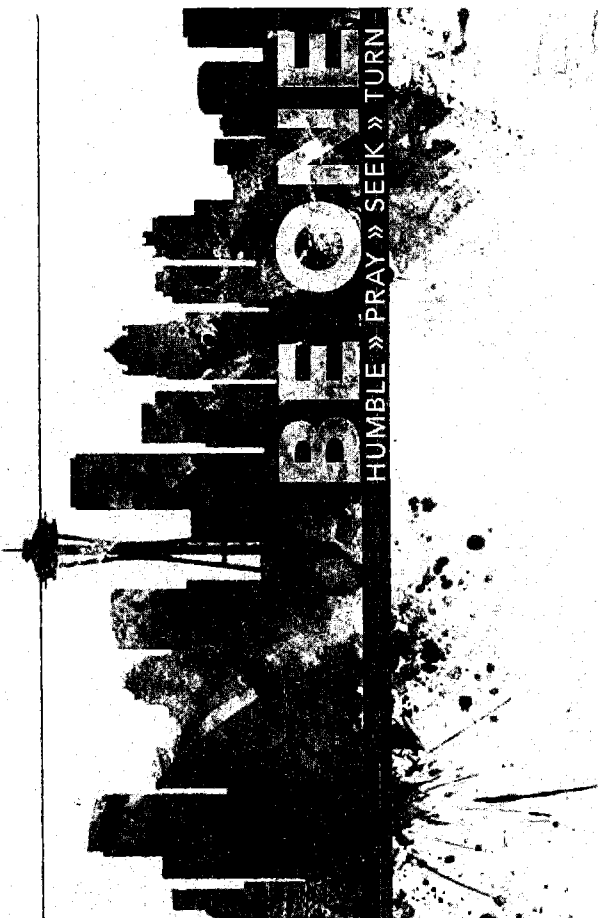


SEATTLE FIRST PRESBYTERIAN



WWW.BETHANYPC.ORG :: WWW.EMERALDCITYBIBLE.ORG :: WWW.MTVIEWPC.ORG
WWW.FIRSTPRES.ORG :: WWW.URBANIMPACTSEATTLE.ORG

**NOVEMBER 8 :: 10:30 :: SEATTLE FIRST PRES
WORSHIPING
TOGETHER
GATHERING TOGETHER IN THE NAME OF CHRIST**



THE CITY

KIDS

**Parents: Sign up your child for their class in the lobby before service. Ages 3-8 will remain in service until after the children's sermon.*

Nursery : Corner Nursery Room
(open at 10:15am)

Age 3 : Across from Nursery

Ages 4 - Kindergarten : Choir Room

1st - 3rd Grades : Chapel

COMMUNITY LUNCH

Please pick up some food downstairs and join us for lunch after service!
Thanks to Mitra Goltapeh and Asiieh Haghgou for cooking Persian rice and chicken.

"BE ONE" DECALS

Our hope is that each of us can display this sticker in a space (car bumper, window, laptop, skate board, gym bag, etc.) that will serve as a reminder and will invite discussions about our Oneness in Christ.
May God use this simple but profound decal to transform hearts and connect us, that we may truly BE ONE!



MARK YOUR CALENDAR!

JANUARY 2016

We are working with Sgt Adrian Diaz and other officers of the Seattle Police Department to present a **Micro Community Policing Presentation** and panel discussion. Our hope is to build trust between the SPD and general community and learn of ways to work together. Stay tuned for more information.

Worship in Song
LET IT RISE/ANCIENT OF DAYS
EVERY PRAISE
ALL CREATURES OF OUR GOD AND KING
WORSHIP TEAM

Welcome & Announcements
PASTOR HARVEY DRAKE

Hymn of Praise #466
O FOR A THOUSAND TONGUES TO SING
SYLVIA OINES

Offertory Dance
LOUIE PRASEUTH

Offering
SEE THE BACK PAGE FOR OFFERING INFORMATION
PASTOR DOUG KELLY

Children's Time
TIFFANY ACKER

Doxology

Message
JOHN 17:20-26
2 CHRONICLES 7:12-18
DR. CURTISS DEYOUNG

Call to Lament
PASTOR TASHA HICKS MCCRAY

Communion
PASTOR JEFF SCHULZ

Worship in Song
REVELATION SONG
WE WILL FEAST
10,000 REASONS
WORSHIP TEAM

Prayers for Justice & Reconciliation
PASTOR LYNNE FARIS BLESSING
SEATTLE PUBLIC SCHOOLS - MR. KELLY ARAMAKI
HIGHLINE PUBLIC SCHOOLS - DR. SUSAN ENFIELD

Benediction
PASTOR ELLEN SCHULZ

Closing Song
PASS ME NOT/DO NOT PASS
WORSHIP TEAM