

THE HONORABLE JAMES L. ROBERT

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IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

ATIGEO LLC, a Washington limited liability company, and MICHAEL SANDOVAL, an individual; and)	Civil Action No. 2:13-cv-1694-JLR
)	
Plaintiffs,)	DECLARATION OF BRIAN C. PARK IN SUPPORT OF PLAINTIFFS' MOTION FOR MUTUAL PROTECTIVE ORDER GOVERNING DISCOVERY
vs.)	
)	
OFFSHORE LIMITED D, a California partnership; DENNIS MONTGOMERY, individually and as a partner of Offshore Limited D; ISTVAN BURGYN, individually and as a partner of Offshore Limited D; DEMARATECH, LLC, a California limited liability company; and DOES 1-25, inclusive;)	
)	
Defendants.)	
)	

I, Brian C. Park, declare and state:

1. I am one of the attorneys for Plaintiff Atigeo LLC ("Atigeo") in this matter. I am competent to testify, and this declaration is based on my personal knowledge unless the context indicates otherwise.

2. Attached as Exhibits 1 and 2, respectively, are true and correct copies of Defendant Montgomery's March 4, 2014 first sets of interrogatories and requests for production to Plaintiffs Atigeo and Michael Sandoval.

1 3. Attached as Exhibit 3 is a true and correct copy of my January 28, 2014 e-mail to
2 all Defendants' counsel, attaching Plaintiffs' proposed stipulated protective order.

3 4. Attached hereto as Exhibit 4 is a true and correct copy of a March 6-7, 2014 e-mail
4 chain, in which counsel for Atigeo and the *Individual Defendants* (Dennis Montgomery and
5 Istvan Burgyan) are attempting to schedule a Rule 26(c) conference to discuss the bases for the
6 Individual Defendants' position that no protective order governing discovery is needed.

7 5. Attached hereto as Exhibit 5 is a true and correct copy of a March 10, 2014 e-mail
8 I sent to the Individual Defendants' counsel explaining Plaintiffs' position on the proposed
9 stipulated protective order.

10 6. Attached hereto as Exhibits 6(A) - (C) are true and correct copies of *subpoenas*
11 *duces tecum* served by Defendant Montgomery on Amy Dedoyard, Windermere Real Estate, and
12 206, Inc.

13 7. Attached hereto as Exhibit 7 is a true and correct copy of a February 18, 2014 e-
14 mail from counsel for the *Entity Defendants* (Offshore Ltd D and Demaratech, LLC), consenting
15 to the two-tiered AEO/Confidential protective order Plaintiffs had proposed.

16 8. Attached hereto as Exhibit 8 is a true and correct copy of a March 17, 2014 e-mail
17 I sent to the Individual Defendants' counsel confirming the parties' impasse on the protective
18 order issues.

19 9. Attached hereto as Exhibit 9 is a true and correct copy of the Wikipedia article on
20 Defendant Montgomery.

21 I declare under penalty of perjury under the laws of the United States that the foregoing is
22 true and correct.

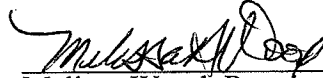
23 Executed this 19th day of March, 2014 in Seattle, Washington.

24 s/ Brian C. Park
25 Brian C. Park

CERTIFICATE OF SERVICE

I hereby certify that on March 19, 2014, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the parties of record in the above case.

STOEL RIVES LLP



Melissa Wood, Practice Assistant
Dated at Seattle, WA on March 19, 2014

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