

April 19, 2017

Sue Tanner, Hearing Examiner
Office of the Hearing Examiner
700 Fifth Avenue, Suite 4000
Seattle, WA 98124

Re: *In re Appeal of Protect Volunteer Park*
Appellant's Response to Discovery Request

Dear Madam Hearing Examiner:

Yesterday, we received the appellant's response to our requests for copies of its membership list and organizational documents. Rather than simply producing the documents, the appellant filed an objection, styled as a responsive brief. If the Hearing Examiner deems it necessary, Seattle Art Museum ("SAM") is prepared to file a prompt reply to explain why the documents are discoverable and what is required to have standing in the context of a SEPA appeal. *See* HER 2.16(c).

We also wish to emphasize that SAM intends to include a standing argument in its motion to dismiss if the record supports such an argument. The Hearing Examiner's prior scheduling order established a filing deadline of May 1, 2017 for that motion.

Very truly yours,

HILLIS CLARK MARTIN & PETERSON P.S.

By 

Amit D. Ranade

cc: David Bricklin, counsel for Appellant
Daniel B. Mitchell, Seattle City Attorney's Office

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