

EXPEDITE  
■ Hearing is set:  
Date: September 6, 2024  
Time: 9:00 a.m.  
Judge/Calendar: Hon. Anne Egeler

**IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON  
IN AND FOR THE COUNTY OF THURSTON**

SAVE THE DAVIS-MEEKER GARRY OAK,

Plaintiff,

vs.

DEBBIE SULLIVAN, in her capacity of Mayor  
of Tumwater,

Defendant.

**NO. 24-2-01895-34**

**REPLY DECLARATION OF JEFFREY  
S. MYERS IN SUPPORT OF MOTION  
FOR ATTORNEY’S FEES**

I, Jeffrey S. Myers, hereby states and declares as follows:

1. I am the attorney for Defendant Mayor Debbie Sullivan, who has been sued in her official capacity and the City of Tumwater in the above entitled matter. I am over the age of 18, am competent to testify herein, and make this declaration based upon personal knowledge.

2. The City of Tumwater was considering what to do with the Davis Meeker Garry Oak for several months prior to the filing of this matter on May 24, 2024. It was raised in the March 11, 2024 City Council meeting and the Historic Commission considered a request to de-list the Tree as a heritage tree in April 2024. The City publicized its consideration on its website and posted the findings and recommendations of the City arborist on-line. The City’s stated intent was to protect against potential liability from falling limbs.



# Exhibit A

