

THE HONORABLE RICHARD A. JONES

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

BLACK LIVES MATTER SEATTLE-KING
COUNTY, ABIE EKENEZAR, SHARON
SAKAMOTO, MURACO KYASHNA-
TOCHA, ALEXANDER WOLDEAB,
NATHALIE GRAHAM, and ALEXANDRA
CHEN,

Plaintiffs,

v.

CITY OF SEATTLE,

Defendant.

NO. 2:20-cv-00887

DECLARATION OF ROBERT L.
CHRISTIE

I, ROBERT L. CHRISTIE, hereby declare as follows:

1. I am over the age of eighteen years and am a citizen of the United States. I have personal knowledge of the facts set forth herein and am competent to testify to them at trial.

2. I am one of the attorneys of record for defendant in this matter.

3. Attached hereto as **Exhibit A** for the Court's convenience is an index of the total number of deployments of OC spray, blast balls, and less lethal munitions that were identified in the draft Blue Team reports, previously filed with the Declaration of Assistant Chief Lesley Cordner,

DECLARATION OF
ROBERT L. CHRISTIE (2:20-CV-00887) - 1

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206-957-9669

1 Dkt. 146, from August 26, September 7, September 22, and September 23, 2020.

2 4. Over the relevant four days, there were a total of 122 CCW deployments (50 OC
3 spray, 60 blast balls, 12 less lethal rounds).

4 5. Attached hereto as **Exhibit B** is a true and correct copy of the SPD Blue Team
5 template.

6 I declare under penalty of perjury under the laws of the United States of America that the
7 foregoing is true and correct to the best of my knowledge and belief.

8 SIGNED in Seattle, Washington, this 21st day of December, 2020.

9
10 */s/ Robert L. Christie*
11 ROBERT L. CHRISTIE