

Honorable Richard A. Jones

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

SEATTLE MIDEAST AWARENESS
CAMPAIGN, a Washington non-profit
corporation,

Plaintiff,

v.

KING COUNTY, a municipal corporation,

Defendant.

NO. 11-cv-00094 RAJ

SECOND DECLARATION OF
JEFFREY GRANT (REGARDING
SEAMAC'S MOTION FOR
PRELIMINARY INJUNCTION)

Jeffrey Grant declares under penalty of perjury under the laws of the United States that the following is true.

1. I am an attorney with Skellenger Bender, PS. Together with Sarah Dunne and Lindsey Soffes, with the ACLU of Washington Foundation, we are representing Plaintiff Seattle Mideast Awareness Campaign (SeaMAC) in this action. This declaration concerns that of Paul Bachtel, submitted by Defendant King County, and the implication that his conduct with respect to SeaMAC's poster represented a formal or official position of the membership of ATU 587. Amalgamated Transit Union is the Metro bus drivers' union, ATU 587 is the Local Chapter, and Mr. Bachtel is President of Local 587.

2. Attached to my declaration and marked as Exhibit D is a copy of the January 6, 2011 posting made by Jeff Welch on the Puget Sound Transit Operators website,

1 psitransitoperators.wordpress.com, concerning communications by Mr. Bachtel to Kevin
 2 Desmond, General Manager of the Transit Division of Defendant King County's Department
 3 of Transportation. Although not officially affiliated with the ATU, the website is "intended to
 4 provide items of interest, information, and opportunities for interaction from the perspective
 5 of those of us behind the wheels, throttles, wrenches, radios and computers operating local
 6 public transit." The attached copy contains Mr. Welch's entire blog; it does not contain all of
 7 the responses.

8 3. The January 6, 2011 posting (Ex. D) objected to Mr. Bachtel's communications
 9 regarding SeaMAC's poster being characterized on behalf of ATU 587's membership. In
 10 part, Mr. Welch observed that "President Bachtel appears to have acted largely on his own, in
 11 support of his own strong biases in the political aspects in this matter [the SeaMAC poster]."

12 Jeffrey Grant 

13 Date and Place of Execution

FEBRUARY 13, 2011; Seattle, WA

CERTIFICATE OF SERVICE

I certify that on February 13, 2011 I electronically filed the Second Declaration of Jeffrey Grant (Regarding SeaMAC's Motion for Preliminary Injunction) (together with the attached Exhibit D) and this Certificate of Service with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to Cynthia Gannett, Endel R. Kolde, and Jennifer Ritchie, counsel for Defendant King County.

By s/ Jule Sprenger
Jule Sprenger
Legal Assistant
Skellenger Bender, P.S.
1301 Fifth Avenue, Suite 3401
Seattle, WA 98101
Tel: (206) 623-6501
Fax: (206) 447-1973
Email: jsprenger@skellengerbender.com