SUPERIOR COURT OF WASHINGTON FOR KING COUNTY

MARIA LUISA JOHNSON, CARMELIA DAVIS-RAINES, CHERYL MUSKELLY, PAULINE ROBINSON, ELAINE SEAY-DAVIS, TONI WILLIAMSON, and LYNDA JONES

No. 15-2-03013-2

Plaintiffs,

DECLARATION OF ROGERICH FAUSTINO

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VS.

SEATTLE PUBLIC UTILITIES, a department of the CITY of SEATTLE, a municipality

TRIAL DATE: JULY 11, 2016

Defendant.

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- I, Rogerich Faustino, declare and state as follows:
- 1. I am employed as a utilities account representative supervisor with Seattle Public Utilities, and I am 39 years old.
- 2. Plaintiffs' counsel deposed me on May 5, 2016, and at that deposition I felt as though he was accusing me of being racist towards African Americans and other persons of color.

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- 3. Immediately following my deposition, Plaintiff Toni Williamson confronted me in the office lobby.
- 4. I apologized to Ms. Williamson because she was under the mistaken impression that I am a racist; not because I lied during my deposition. I never told Ms. Williamson that I had lied during my deposition.
 - 5. I did not lie during my deposition.

I declare under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct.

EXECUTED this 25 day of May, 2016, in Seattle, Washington.

Rogerich Fausting

1	CERTIFICATE OF SERVICE
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3	I hereby certify that I caused a true and correct copy of the document to which this
4	certificate is attached to be served in the manner as indicated below:
5	John P. Sheridan, WSBA #21473
6	Attorney for Plaintiffs The Sheridan Law Firm, P.S. Federal Express To 7 6
7	705 Second Avenue, Suite 1200 Seattle, WA 98104 Federal Express Facsimile
8	Tel: (206) 381-5949
9	Fax: (206) 447-9206
10	
11	Declared under penalty of perjury under the laws of the state of Washington dated at
12	Seattle, Washington this 27th day of May, 2016.
13	/s/ Lynn Nydam
14	Lynn Nydam
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