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**THE SUPERIOR COURT OF WASHINGTON  
IN AND FOR SKAGIT COUNTY**

CITY OF SEDRO-WOOLLEY and CITY  
OF STANWOOD, Washington municipal  
corporations,

Plaintiff,

v.

JOSE RORDRIGUEZ,

Defendant.

**NO. 25-2-00717-29**

**DEFENDANT'S RESPONSE TO  
PLAINTIFF'S MOTION FOR  
DECLARATORY JUDGMENT**

**STATEMENT OF FACTS**

On April 10, 2025, Defendant Jose Rodriguez made a public records request to the City of Stanwood for all of the Flock camera images and data logs between 5 and 6 PM on March 30, 2025. Defendant responded on April 16, 2025, that there were no responsive records to Plaintiff's April 10, 2025, records request and closed the request. The City of Stanwood does not dispute that there were records and that Stanwood could have downloaded those records. Further, Stanwood does not dispute that the records Jose Rodriguez requested could have been preserved by Stanwood, but Stanwood chose to allow those records to be auto-deleted because Stanwood did not download the records or make any effort to preserve those records. Stanwood also failed to provide Mr. Rodriguez with an exemption log for the records Stanwood failed to produce.

1 On May 29, 2025, Plaintiff made a PRA request to the City of Sedro-Woolley. Within this  
2 PRA request, Plaintiff requested Defendant provide all of the images and data logs created  
3 by all of the Flock Safety cameras installed in the city between the times of 5:00 pm and 5:30  
4 pm on 5/5/2025. Plaintiff made the request through the Sedro-Woolley Public Records  
5 Center. Defendant replied on May 29, 2025, that they had received the request and had been  
6 given the reference number of S000297-052925. On June 5, 2025, Defendant sent a message  
7 to Plaintiff stating additional time is needed, as the request is pending legal review and they  
8 would contact Plaintiff on or before June 26, 2025, with an update on the request. On June  
9 13, 2025, Defendant sent a message to Plaintiff stating that “*upon the advice of Defendant’s*  
10 *attorney, Defendant intends to seek a declaratory judgment on the status of Flock data and*  
11 *they will contact Plaintiff on or before August 12, 2025.*” Just as with the City of Stanwood,  
12 Sedro-Woolley had access to the records requested by Jose Rodriguez, but Sedro Woolley  
13 chose to not download or preserve the requested records and allowed those records to be  
14 auto-deleted. Sedro-Woolley also failed to provide Mr. Rodriguez for the records that Sedro-  
15 Woolley failed to produce. Further, as the Flock agreements with Stanwood/Sedro-Woolley  
16 make clear, the images generated by the Flock cameras installed in each city are the sole  
17 property of Stanwood and Sedro-Woolley.  
18

19 **ISSUES PRESENTED**

- 20
- 21 1. Is Skagit County Superior Court the correct venue to hear a public records case for a  
22 city that is located in Snohomish County.
  - 23 2. Have all of the necessary parties been added to this case.
  - 24 3. Are the records requested by Jose Rodriguez public records under the Washington  
25 State Public Records Act.

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4. Do any established exemptions apply to the records requested by Jose Rodriguez.

**LEGAL ARGUMENT**

Under RCW 42.56.550 of the Washington State Public Records Act, venue is proper in the Superior Court where the records are held:

(1) Upon the motion of any person having been denied an opportunity to inspect or copy a public record by an agency, the superior court in the county in which a record is maintained may require the responsible agency to show cause why it has refused to allow inspection or copying of a specific public record or class of records. The burden of proof shall be on the agency to establish that refusal to permit public inspection and copying is in accordance with a statute that exempts or prohibits disclosure in whole or in part of specific information or records.

(2) Upon the motion of any person who believes that an agency has not made a reasonable estimate of the time that the agency requires to respond to a public record request or a reasonable estimate of the charges to produce copies of public records, the superior court in the county in which a record is maintained may require the responsible agency to show that the estimate it provided is reasonable. The burden of proof shall be on the agency to show that the estimate it provided is reasonable.

(3) Judicial review of all agency actions taken or challenged under RCW 42.56.030 through 42.56.520 shall be de novo. Courts shall take into account the policy of this chapter that free and open examination of public records is in the public interest, even though such examination may cause inconvenience or embarrassment to public officials or others. Courts may examine any record in camera in any proceeding brought under this section. The court may conduct a hearing based solely on affidavits.

(4) Any person who prevails against an agency in any action in the courts seeking the right to inspect or copy any public record or the right to receive a response to a public record request within a reasonable amount of time shall be awarded all costs, including reasonable attorney fees, incurred in connection with such legal action. In addition, it shall be within the discretion of the court to award such person an amount not to exceed one hundred dollars for each day that he or she was denied the right to inspect or copy said public record.

(5) For actions under this section against counties, the venue provisions of RCW 36.01.050 apply.

(6) Actions under this section must be filed within one year of the agency's claim of exemption or the last production of a record on a partial or installment basis.

1 (emphasis added)

2 Further, where an agency seeks to enjoin the release of public records, venue is the  
3 Superior Court when the agency records are maintained under RCW 42.56.540:

4 The examination of any specific public record may be enjoined if, upon  
5 motion and affidavit by an agency or its representative or a person who is named  
6 in the record or to whom the record specifically pertains, the superior court for  
7 the county in which the movant resides or in which the record is maintained,  
8 finds that such examination would clearly not be in the public interest and would  
9 substantially and irreparably damage any person, or would substantially and  
10 irreparably damage vital governmental functions. An agency has the option of  
11 notifying persons named in the record or to whom a record specifically pertains,  
12 that release of a record has been requested. However, this option does not exist  
13 where the agency is required by law to provide such notice.

14 (emphasis added)

15 Thus the statutory intent is clear for municipal agency records. Any issue pertaining to  
16 the production of the requested records, or efforts to enjoin the release of the requested records  
17 must be conducted in the Superior Court of the County where the records are maintained. As it  
18 pertains to the City of Stanwood, that would be Snohomish County and as such, Stanwood must  
19 be dismissed from this action.

## 20 RCW 7.24 DECLARATORY JUDGMENT

21 RCW 7.24 has specific requirements in order for a Superior Court to be able to render  
22 judgment on the question before the Court. One of those requirements, RCW 7.24.110 requires  
23 that all parties who have an interest in the outcome be made a party:

24 When declaratory relief is sought, all persons shall be made parties who  
25 have or claim any interest which would be affected by the declaration, and no  
declaration shall prejudice the rights of persons not parties to the proceeding. In  
any proceeding which involves the validity of a municipal ordinance or franchise,  
such municipality shall be made a party, and shall be entitled to be heard, and if the  
statute, ordinance or franchise is alleged to be unconstitutional, the attorney general  
shall also be served with a copy of the proceeding and be entitled to be heard.

(emphasis added)

1 Here, the cities of Stanwood and Sedro-Woolley seek a ruling that would bind  
2 every municipality in Snohomish County and Skagit County. Shouldn't cities who  
3 believe that Flock camera images are public records be allowed to be heard on the issue?

4 Under RCW 7.24.110, "[w]hen declaratory relief is sought, all  
5 persons shall be made parties who have or claim any interest which  
6 would be affected by the declaration, and no declaration shall  
7 prejudice the rights of persons not parties to the proceeding." If the  
8 challenge involves a municipal ordinance, the municipality shall be  
9 made a party. RCW 7.24.110. This statute should be liberally  
10 construed. RCW 7.24.120.

11 3456 *The trial court lacks jurisdiction if the necessary parties are*  
12 *not joined.* *Henry*, 30 Wash.App. at 243, 246, 633 P.2d 892. A  
13 party is necessary if " 'a complete determination of a controversy  
14 cannot be had' " without its presence. *Town of Ruston v. City of*  
15 *Tacoma*, 90 Wash.App. 75, 82, 951 P.2d 805 (1998) (citations  
16 omitted). *Stated another way, a necessary party is "one whose*  
17 *ability to protect its interest in the subject matter of the litigation*  
18 *would be impeded by a judgment."* *Primark Inc. v. Burien*  
19 *Gardens Assocs.*, 63 Wash.App. 900, 907, 823 P.2d 1116 (1992).  
20 The party must have a sufficient interest "such that [a] judgment  
21 cannot be determined without affecting that interest." *Primark*, 63  
22 Wash.App. at 907, 823 P.2d 1116.

23 *Treyz v. Pierce Cnty.*, 118 Wash. App. 458, 462-63, 76 P.3d 292,  
24 294 (2003)

25 To this point, the Court would not be able to terminate the controversy for Cites that do  
consider the Flock images to be public records. Additionally, it appears that there may be pending  
public records requests for Flock records to cities within both Snohomish and Skagit counties  
according to a 2025 UW report (see **declaration of Jose Rodriguez attachment C**). The  
declaratory judgment sought by Stanwood and Sedro-Woolley would leave a mishmash of  
municipalities, some of whom consider Flock images as public records and some who do not:

The court may refuse to render or enter a declaratory judgment or decree  
where such judgment or decree, if rendered or entered, would not terminate the  
uncertainty or controversy giving rise to the proceeding.

1 RCW 7.24.060

2 If multiple agencies within Snohomish and Skagit County are treating the Flock records  
3 differently (some agreeing that the records are subject to the PRA and some arguing that the  
4 Flocks aren't subject to the PRA), then the controversy cannot be terminated without additional  
5 interested parties having the opportunity to be heard:  
6

7 The superior court may refuse to render a declaratory judgment  
8 where such judgment, if rendered, would not terminate the  
9 uncertainty or controversy giving rise to the proceeding. RCW  
10 7.24.060. In addition, the superior court may dismiss a declaratory  
11 judgment action where all persons who have a claim or interest in  
12 the court's determination have not been joined. RCW 7.24.110;  
13 *Bainbridge Citizens United v. Dep't of Natural Res.*, 147 Wn.App.  
14 365, 371–72, 198 P.3d 1033 (2008) (holding a superior court lacks  
15 jurisdiction if all necessary parties are not joined). Under RCW  
16 7.24.110, a party seeking declaratory judgment must join “all  
17 persons ... who have or claim any interest which would be affected  
18 by the declaration.” A party is necessary if  
19 (1) [T]he trial court cannot make a complete determination of the  
20 controversy without that party's presence,  
21 (2) the party's ability to protect its interest in the subject matter of  
22 the litigation would be impeded by a judgment in the case, and  
23 \*3 (3) judgment in the case necessarily would affect the party's  
24 interests.

17 Washington State Med. Ass'n v. Kreidler, 174 Wash. App. 1079  
18 (2013) (emphasis added)

19 **THE PUBLIC RECORDS ACT**

20 The Public Records Act “is a ‘strongly worded mandate for broad disclosure of public  
21 records.’” *Doe ex rel. Roe v. Washington State Patrol*, 185 Wn.2d 363, 371, 185 P.3d 63 (2016)  
22 citing *Hearst Corp. v. Hoppe*, 90 Wash.2d 123, 127, 580 P.2d 246 (1978).  
23

24 This powerful statement by the Washington State Supreme Court is derived from RCW  
25 42.56.030, which states in relevant part about the Public Records Act of RCW 42.56:

1 “The people of this state do not yield their sovereignty to the agencies that serve  
2 them. The people, in delegating authority, do not give their public servants the right  
3 to decide what is good for the people to know and what is not good for them to  
4 know. The people insist on remaining informed so that they may maintain control  
over the instruments that they have created. *This chapter shall be liberally  
construed and its exemptions narrowly construed to promote this public policy  
and to assure that the public interest will be fully protected.*”

5 (Emphasis added)

6 Once an agency that is subject to the PRA receives a request for public records, that agency  
7 is required to respond to that request within 5 business days in one of five ways among other  
8 requirements:

9 Upon a request for identifiable public records, an agency shall make them  
10 “promptly available.” RCW 42.56.080(2). Under the PRA, an agency must provide  
11 “the fullest assistance to inquirers and the most timely possible action on requests  
12 for information.” RCW 42.56.100. When a records request is received, the agency  
13 must respond within five business days by either (1) providing the records, (2)  
14 providing a link to the records requested, (3) providing a reasonable estimate of the  
time it will take to respond, (4) asking for clarification along with an estimated time  
to respond, or (5) deny the request. RCW 42.56.520(1). Under RCW 42.56.080, an  
agency may produce records in installments.

15 *Cantu v. Yakima Sch. Dist. No. 7*, 23 Wash. App. 2d 57, 89, 514 P.3d 661, 679 (2022)

16 When an agency fails in its responsibilities under the PRA, the PRA specifically authorizes  
17 causes of action under two circumstances: (1) when an agency has denied a requestor access to  
18 records (*i.e.*, has wrongfully withheld records); and (2) when a requestor believes an agency’s  
19 estimate of time or the expense of producing records is unreasonable. *RCW 42.56.550(1) and (2)*.  
20 Plaintiff has challenged both the denial of the records, and the time estimate provided by SPD.

21 A show cause hearing is an appropriate method to resolve PRA claims. *Kittitas Cnty v.*  
22 *Allphin*, 2 Wn. App. 2d 782, 789-93 413 P.3d 22 (2018), review denied, 191 Wn.2d 1014, 426  
23 P.3d 740 (2018). Washington State courts have outlined this process.  
24

25 “Agencies are required to disclose any public record on request unless it falls within  
a specific, enumerated exemption. RCW 42.56.070(1).<sup>5</sup> The burden is on the

Defendant’s Response to Plaintiff’s  
Motion for Declaratory Judgment

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1 agency to show a withheld record falls within an exemption, and *the agency is*  
2 *required to identify the document itself and explain how the specific exemption*  
3 *applies in its response to the request.* RCW 42.56.550(1); *Sanders v. State*, 169  
4 Wash.2d 827, 845–46, 240 P.3d 120 (2010).”

5 *Neighborhood All. of Spokane Cnty. v. Spokane Cnty.*, 172 Wash. 2d 702, 715, 261 P.3d 119,  
6 125 (2011). (emphasis added)

7 In this case, the Stanwood/Sedro-Woolley cannot meet their burden of proof.  
8 Stanwood/Sedro-Woolley claim that each fully complied with the PRA in the handling of Mr.  
9 Rodriguez’s April 10, 2025 and 2025, PRA request to Stanwood and Sedro-Woolley. The precise  
10 way Stanwood/Sedro-Woolley claim to have complied with the PRA is not clear. In both cases,  
11 the records sought by Mr. Rodriguez were records in the possession of the respective cities that  
12 each city could have searched, downloaded, redacted (if necessary) and produce. Stanwood/Sedro-  
13 Woolley routinely search, download and produce these same records to law enforcement.  
14 Stanwood/Sedro-Woolley justifies the refusal to produce records, in part, by asserting that the  
15 records are exempt from disclosure due to an “special intelligence information” exemption, under  
16 RCW 42.56.240(1).

17 To qualify for the Special Intelligence Information exemption Stanwood/Sedro-Woolley  
18 have the burden of showing that the records that Mr. Rodriguez sought are “highly offensive to a  
19 reasonable person,” but Stanwood/Sedro-Woolley makes no such claim:

20 The “investigative records” exemption, which is contained in RCW 42.56.240(1),  
21 contains two prongs known colloquially as “privacy” and “law enforcement.” The  
22 Students contend that the trial court erred by not applying the “privacy” prong of  
23 the investigative records exemption. Both the Students and the University argue  
24 that the trial court erred by not applying the “law enforcement” prong. We conclude  
25 that the trial court did not err in refusing to apply the exemption.

26 *“Privacy” Prong*

27 ¶ 40 The “privacy” prong exempts from disclosure “[s]pecific intelligence  
28 information and specific investigative records compiled by investigative, law  
29 enforcement, and penology agencies, and state agencies vested with the  
30 responsibility to discipline members of any profession, the nondisclosure of which

1 is essential ... for the protection of any person's right to privacy.” RCW  
2 42.56.240(1). A party asserting a privacy-based PRA exemption must prove that  
3 disclosure is both “highly offensive to a reasonable person” and “not of  
4 legitimate concern to the public.” RCW 42.56.050.

5 ¶ 41 Recently, our Supreme Court, in examining *Restatement (Second) of Torts* §  
6 652(D) (1977), explained that “the PRA will not protect everything that an  
7 individual would prefer to keep private.” *Predisik v. Spokane Sch. Dist. No. 81*,  
8 182 Wash.2d 896, 904–05, 346 P.3d 737 (2015). Because “[t]he PRA’s ‘right to  
9 privacy’ is narrower,” the court observed, “[i]ndividuals have a privacy right under  
10 the PRA only in the types of ‘private’ facts fairly comparable to those shown in the  
11 *Restatement.*” *Predisik*, 182 Wash.2d at 905, 346 P.3d 737.

12 *Does v. King Cnty.*, 192 Wash. App. 10, 25–26, 366 P.3d 936, 944 (2015)

13 Stanwood/Sedro-Woolley do not claim that any of the records are “highly offensive to a  
14 reasonable person.” In fact, in their memorandum in support of the motion for declaratory  
15 judgment, Stanwood/Sedro-Woolley describe the records sought by Plaintiff as “The images, in  
16 their raw form, a merely snapshots of vehicles in a public space. They contain no information  
17 related to a specific law enforcement investigation...” But this is one of the requirements of the  
18 exemption sought by Stanwood/Sedro-Woolley:

19 Under RCW 42.56.240(1), specific intelligence information and specific  
20 investigative records may be exempt from production. This exemption is intended  
21 to protect the integrity of law enforcement investigations. *Koenig v. Thurston*  
22 *County*, 175 Wash.2d 837, 843, 287 P.3d 523 (2012). To qualify for this  
23 exemption, the record must be (1) specific information that is intelligence or  
24 investigative in nature; (2) compiled by an investigative, law enforcement, or  
25 penological agency; and (3) essential to law enforcement or the protection of  
privacy. RCW 42.56.240(1); *Wade's Eastside Gun Shop, Inc. v. Dep't of Labor and*  
*Indus.*, 185 Wash.2d 270, 281, 372 P.3d 97 (2016).

Specific investigative records are records compiled from a specific investigation  
that focused on a particular party. *Koenig*, 175 Wash.2d at 843, 287 P.3d 523. A  
specific investigation is “designed to ferret out criminal activity or to shed light  
on some other allegation of malfeasance.” *Columbian Publ'g Co. v. City of*  
*Vancouver*, 36 Wash. App. 25, 31, 671 P.2d 280 (1983). The City does not argue  
that the redacted documents were investigative records, and because the redacted  
records did not result from a particular investigation, these records cannot be  
specific investigative records. Thus, our first focus is on the question of whether  
the information is “specific intelligence information.”

1                   “Specific intelligence information” is not defined in the PRA. “[T]he term  
2                   ‘specific’ in the exemption for specific intelligence information must be read to  
3                   require not that the information concern particular individuals, but that it  
4                   disclose particular methods or procedures for gathering or evaluating  
5                   intelligence information.” *Haines-Marchel v. Dep’t of Corr.*, 183 Wash. App. 655,  
6                   669, 334 P.3d 99 (2014).

7                   *West v. City of Tacoma*, 12 Wash. App. 2d 45, 70–71, 456 P.3d 894, 909–10 (2020)

8                   In order to claim the Special Intelligence Information exemption, Stanwood/Sedro-  
9                   Woolley must show that the requested records would disclose particular methods or procedures  
10                  for gathering or evaluating intelligence information. This burden is impossible for  
11                  Stanwood/Sedro-Woolley to meet since they have made the public aware that they are using Flock  
12                  cameras and the cameras in question are not hidden, but operated in plain sight of the general  
13                  public. Many cities in Snohomish and Skagit counties have held multiple city council meetings to  
14                  discuss the use of Flock cameras and it has recently been discovered that other cities and the federal  
15                  government are also able to access Flock images from within the various cities who have Flock  
16                  cameras. Federal immigration authorities accessed Washington state license plate readers, report  
17                  finds | king5.com

18                  Furthermore, in September of 2025, Mr. Rodriguez made a subsequent public records  
19                  request to Stanwood/Sedro-Woolley for footage from security cameras at Stanwood/Sedro-  
20                  Woolley City Hall. The Cities immediately complied and provided the security footage from City  
21                  Hall which shows vehicles, people, buildings and license plates (*see Declaration of Jose*  
22                  *Rodriguez*). More information than that captured by the Flock cameras. Flock captures images but  
23                  the surveillance footage at the Stanwood/Sedro-Woolley city halls, captures endless video footage  
24                  of citizens walking and driving and, in some cases, talking. Stanwood/Sedro-Woolley consider  
25                  those videos to be public records so what distinguishes those records from Flock records? When

Stanwood/Sedro-Woolley provided Mr. Rodriguez those video records, they had to conduct a

1 search, download those videos and provide those records to Plaintiff, just as they would have had  
2 to do with the Flock data. And similar security video footage has been previously dealt with in  
3 Washington Public Records Act caselaw:

4 Conversely, *Jane Does 1-15 v. King County* declined to apply this rationale to  
5 university security video footage. 192 Wash. App. 10, 28, 366 P.3d 936 (2015).  
6 There, university cameras recorded an on-campus shooting. *Does*, 192 Wn. App. at  
7 15, 366 P.3d 936. The university and the students that were depicted in the security  
8 footage argued that the specific intelligence information exemption prevented  
9 disclosure of the footage. *Does*, 192 Wash. App. at 27, 366 P.3d 936. Division *One*  
10 *of this court held that the university and students failed to provide a persuasive*  
11 *reason as to why disclosure would harm future law enforcement efforts.* *Does*,  
12 192 Wash. App. at 27-29, 366 P.3d 936.

13 *West v. City of Tacoma*, 12 Wash. App. 2d 45, 73, 456 P.3d 894, 910 (2020)  
14 (emphasis added)

15 Stanwood/Sedro-Woolley next argue that the images that Flock cameras capture do not  
16 relate to a governmental conduct or function, which factually makes no sense. Stanwood/Sedro-  
17 Woolley contracts with Flock to have Flock install their cameras within the city for the purpose of  
18 giving Stanwood/Sedro-Woolley access to information that can help Stanwood/Sedro-Woolley  
19 solve crimes or to locate certain vehicles, etc. for investigatory purposes- clear governmental  
20 conduct. In addition, the agreement between Stanwood/Sedro-Woolley and Flock (**see declaration**  
21 **of Jose Rodriguez attachments A and B**) make it clear that all images captured by the Flock  
22 cameras are the sole property of Stanwood/Sedro-Woolley:

#### 23 DATA USE AND LICENSING

24 **4.1 Customer Data.** As between Flock and Customer, *all right, title and interest*  
25 *in the Customer Data, belong to and are retained solely by Customer...*Flock does  
not own and shall not sell Customer Data.

Further, Stanwood/Sedro-Woolley's agreement with Flock requires the cities to comply  
with the Washington State Public Records Act as well as Washington records retention schedule:

#### 11. Miscellaneous

1 **11.1 Compliance With Laws.** Parties shall comply with all applicable local, state  
2 and federal laws, regulations policies and ordinances and their associated record  
3 retention schedules, including responding to subpoena requests.

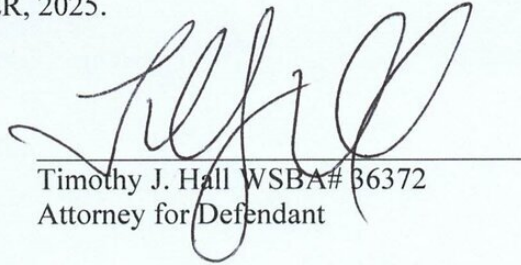
4 Stanwood/Sedro-Woolley's failure to follow the law by violating the PRA in multiple ways  
5 requires the court to find in Mr. Rodriguez's favor and to deny Stanwood/Sedro-Woolley's motion  
6 for declaratory judgment.

7 **CONCLUSION**

8 The public records cases for Stanwood and Sedro-Woolley should be dealt with in their  
9 respective county superior courts. And if the cities chose to go forward with another declaratory  
10 judgment request, the other cities within those respective counties should have notice and the  
11 opportunity to be heard as the court's ruling has financial implications for the cities who chose to  
12 ignore PRA requests for these Flock records. It is undeniable that the Cities of Stanwood and  
13 Sedro-Woolley had access to the Flock images that Mr. Rodriguez requested on April 10, 2025,  
14 And May 29, 2025 and that the Cities could have easily downloaded those images and provided  
15 them to Mr. Rodriguez just as other Washington cities have done. There is no PRA exemption that  
16 applies to the requested records that could not be dealt with via redaction. The records requested  
17 by Mr. Rodriguez are unequivocally public records. Further, it is undeniable that the Cities of  
18 Stanwood and Sedro-Woolley refused to download the images (public records) that were  
19 responsive to Mr. Rodriguez's April 10, 2025, and May 29, 2025 records to Stanwood and Sedro-  
20 Woolley and as a result those images were permanently deleted. The use of Flock cameras serves  
21 an obvious governmental function- law enforcement. According to numerous recent reports, city,  
22 state and federal governments all seek access to these records for governmental purposes. The  
23 Cities of Stanwood and Sedro-Woolley cannot identify any Washington State Public Records Act  
24 exemption that applies to the records requested by Plaintiff and therefore the City has violated the  
25

1 PRA multiple ways in the handling of the Mr. Rodriguez's April 10, 2025, and May 29, 2025  
2 records request to the Cities of Stanwood and Sedro-Woolley. For the reasons set forth above, Mr.  
3 Rodriguez respectfully requests the Court find that Stanwood/Sedro-Woolley violated the PRA in  
4 multiple ways and deny Stanwood and Sedro-Woolley's Motion for Declaratory Judgment.

5 DATED this 24<sup>th</sup> day of OCTOBER, 2025.

6  
7   
8 Timothy J. Hall WSBA# 36372  
9 Attorney for Defendant