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IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON

IN AND FOR THE COUNTY OF KING

PATRICK JONES, individually,)
)
Plaintiff,)
)
vs.) No. 16-2-22028-2SEA
)
BELLEVUE SCHOOL DISTRICT 405, 14A)
public school district; WASHINGTON)
INTERSCHOLASTIC ACTIVITIES)
ASSOCIATION, a nonprofit corporation;))
KINGCO CONFERENCE, a nonprofit)
corporation; and SEA-KING DISTRICT 2)
OF THE WIAA, a nonprofit corporation;))
YARMUTH & WILDSON, PLLC, a Washington)
Professional Limited Liability)
Company, BOB WESTINGHOUSE and)
CARL BLACKSTONE, in their individual)
capacities,)
)
Defendants.)

Deposition Upon Oral Examination of
MICHAEL COLBRESE

Taken at 11819 NE 34th Street
Bellevue, Washington
Thursday, April 13, 2017

Atkinson-Baker, Inc.
Court Reporters
www.depo.com
REPORTED BY: Mindy L. Suurs, CSR No. 2195
File No. AB03B6F

1 MR. TONDINI: I think for completeness's sake,
2 the record should reflect the question for which that's the
3 answer, and the question is: "Are students that
4 participate in a school sponsored summer program required
5 to meet all WIAA eligibility requirements?"

6 BY MS. JONES:

7 Q. Okay. And you would agree with that answer; is
8 that correct?

9 MR. CALFO: Object to the form.

10 A. That's the one that's in the rule book.

11 BY MS. JONES:

12 Q. I'm asking if you would agree with it.

13 A. That's the one that's in the rule book, yes.

14 Q. Yes, you would agree?

15 A. Yes.

16 MR. CALFO: Objection, form.

17 MS. JONES: I'm sorry, did you get that answer?

18 THE COURT REPORTER: Yes.

19 MS. JONES: Thank you.

20 Q. And so now that you've read the Q and A 3 under
21 "Summer Activities" on Page 100 and we've gone to the
22 Jamboree eligibility at 17.27.1, do you agree that there
23 are no Jamborees in the summer for students?

24 MR. CALFO: Object to the form. The question is:
25 Do you agree there are no Jamborees in the summer for the

1 students? Because that appears to be the question.

2 A. Yes.

3 MS. JONES: Thank you.

4 Q. So would it be true to say, then, that any --
5 any -- I'll rephrase that. Hold on one second. As far as
6 the WIAA is concerned, it would consider any play between
7 two member schools as a scrimmage if it occurred in the
8 summer; is that correct?

9 MR. CALFO: Object to the form, to the
10 hypothetical.

11 A. You know, I think we -- a scrimmage and a contest
12 get interchanged, so I would have to again defer to staff
13 and figure out how we are defining scrimmage and contest.

14 BY MS. JONES:

15 Q. Okay. Can you look at 23.1.0. It's on Page 41.

16 A. Okay.

17 Q. Can you read that rule to yourself.

18 Are you done?

19 A. Yes.

20 Q. Is this rule, to the best of your knowledge,
21 stating that there's no eligibility to be in a contest
22 unless the coach is an employee of a member school?

23 MR. CALFO: Object to the form. Most of this
24 states the rule.

25 A. There's no eligibility to be in a contest?