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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.
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REPORTED BY: Mindy L. Suurs, CSR No. 2195

File No. AB03B6F

1 means in this rule?

2 MS. JONES: We already went through that. That
3 would be asked and answered. I'm asking him if there's any
4 difference between in season and in a season.

5 MR. CALFO: Object to the form.

6 A. I'd need to have more before I can answer what
7 you're asking.

8 BY MS. JONES:

9 Q. Okay. Let's go to Rule 23.1.1 then, and you can
10 keep, you know, your finger, I guess, on Page 18 because we
11 might have to go back to it, but to give you more, 23.1.1
12 refers -- it uses the words "in a season." Can you please
13 tell me what that means?

14 MR. CALFO: Object to the form.

15 A. Well, in a season means specifically in a season.
16 You know, it defines season like from the beginning of
17 practice until the end of the state event for that.

18 BY MS. JONES:

19 Q. Okay. So consistent, then, with the rest of your
20 testimony, it does not mean summer; is that correct?

21 MR. CALFO: I'm going to object. I'm going to
22 tell him not to answer the question. Don't tell him what
23 his testimony has been. That is unfair to the witness.

24 Do not answer that question.

25 If you want to ask a question, fine, but don't

1 tell him what he's already testified to. He knows what
2 he's testified to. It's not fair to the witness. Go
3 ahead, ask a question.

4 BY MS. JONES:

5 Q. I'll -- so would that be fair to say that in a
6 season does not include summer?

7 MR. CALFO: Object to the form.

8 BY MS. JONES:

9 Q. Summer activities time period.

10 MR. CALFO: Object to the form.

11 A. Yes.

12 BY MS. JONES:

13 Q. Can you please look at Appendix 8.2?

14 MR. CALFO: What page number, please?

15 MS. JONES: It is on Page 77.

16 Q. When you look at Appendix 8.2, I believe that
17 this is a list of the season beginning and ending dates; is
18 that correct?

19 A. Yes.

20 Q. And is it correct to say that this document does
21 not include the summer?

22 MR. CALFO: Object to the form.

23 A. Correct.

24 Q. Can you please turn to Page 96, and I'm looking
25 at Q and A 17. Can you, to yourself, read the question and