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5
6 UNITED STATES DISTRICT COURT

7 EASTERN DISTRICT OF WASHINGTON

8 PAUL GRONDAL, *et al.*

NO. 09-CV-00018-RMP

9 Plaintiffs,

DECLARATION OF VAN M. BOTTS

10 vs.

11 UNITED STATES OF AMERICA, *et al.*,

12 Defendants.

13 VAN M. BOTTS, pursuant to 28 U.S.C. § 1746, states and declares:

14 1. I make this declaration based upon personal knowledge, and if called upon to
15 do so, could and would testify competently as a witness to the matters stated herein.

16 2. I am a 74-year-old regular member of the Mill Bay Members Association,
17 and the current president of the Association. I bought my membership in 2005 for
18 \$11,000 and have been paying annual dues ever since. As with all other members, I
19 bought the membership with the understanding that the contract would run through 2034.

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1 3. I leave my RV at Mill Bay and use it exclusively there. If we lose this place,
2 I will likely sell the RV and stop camping, as both the geography and the companionship
3 of Mill Bay are irreplaceable.

4 4. I joined the Board of Directors of the Mill Bay Members about 12 years ago
5 and became president about 5 years ago. I have, along with the other 5 board members
6 and many other member volunteers, worked long and hard to assure the efficient and
7 democratic operation of the park. It is a beautiful place. To lose it, after all the effort that
8 has gone into it in reliance on our long-term contract, would be profoundly disappointing,
9 to say the least.

10 5. The memberships in this association represent approximately 500 men,
11 women, and children, not including extended families and friends, all of whom stand to
12 be denied the place they routinely love and depend on for recreation every year. It's like
13 uprooting a whole town.

14 6. Like myself, our members have bought RV's, boats and other expensive
15 items exclusively for the use of this land, not to mention paid thousands of dollars buying
16 the memberships and dues for the right to use this land which was readily accepted by the
17 landowners on the unquestioned basis the our contract with them was good until 2034.
18 We've materially improved this land through hard volunteer work with no help at all from
19 the landowners.

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CERTIFICATE OF SERVICE

I hereby certify that on the 17th day of July, 2020, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF System. Notice of this filing will be sent to the parties listed below by operation of the Court’s electronic filing system. Parties may access this filing through the Court’s system.

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I hereby certify that on the 17th day of July, 2020, Notice of this filing is being sent this date via United States Postal Service First Class Mail to the parties below at the addresses indicated below.

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6 DATED at Wenatchee, Washington this 17th day of July, 2020.

7 By s/Sally W. Harmeling
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