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CASE #: 23-2-10294-1 SEA

THE HONORABLE WILLAM L. DIXON V
Department 46
Hearing Date: July 17, 2026

IN THE SUPERIOR COURT OF THE STATE WASHINGTON
COUNTY OF KING

EPIC HOMEOWNERS ASSOCIATION, a
Washington limited liability company;
BAYVIEW ON THE LAKE CONDOMINIUM
OWNERS ASSOCIATION, a Washington
nonprofit corporation; ARBORETUM AT VISTA
PARK CONDOMINIUM ASSOCIATION, a
Washington nonprofit corporation; THE VINE
BUILDING OWNERS ASSOCIATION, a
Washington nonprofit corporation; and THE
COSMOPOLITAN CONDOMINIUM OWNERS'
ASSOCIATION, a Washington nonprofit
corporation, all individually and on behalf of
similarly situated entities,

Plaintiffs,

v.

MARK HOLMES and J. DOE HOLMES, and the
marital community comprised thereof;
KAPPES MILLER MANAGEMENT, LLC, a
Washington limited liability company; YATES,
WOOD & MCDONALD, INC., a Washington
corporation; ECONDOSERVICES.COM, LLC, a
Washington limited liability company;
ASSOCIATION UNDERWRITERS OF
WASHINGTON, LLC, a Washington limited
liability company; DOE ENTITIES 1–20; and
KELLY SZETO and J. DOE SZETO, and the
marital community comprised thereof,

Defendants.

NO. 23-2-10294-1 SEA

**DECLARATION OF GRAYSON DEITERING
IN SUPPORT OF PLAINTIFFS' MOTION
FOR ATTORNEYS' FEES, LITIGATION
COSTS, AND SERVICE AWARDS**

1 I, Grayson Deitering, declare as follows:

2 1. I am over 18 years of age, I make this declaration based on my own personal
3 knowledge, and I am competent to testify to the facts in this declaration.

4 2. I am a member of the Board of Directors of Arboretum at Vista Park
5 Condominium Owners Association (“Arboretum”).

6 3. Among the services that Arboretum’s property management companies provide
7 is procuring insurance coverage for the condominium.

8 4. Insurance coverage is important to Arboretum and its owners and is often one of
9 Arboretum’s most significant operating expenses.

10 5. Arboretum is largely run by volunteers. Our Board of Directors consists of
11 residents who volunteer their time to run the condominium. These volunteers typically have
12 limited time, financial resources, administrative support, and expertise.

13 6. For several years, Arboretum contracted with defendant EcondoServices.com,
14 LLC, one of the property management companies owned or controlled by Mark Holmes, to
15 manage the condominium.

16 7. Arboretum decided to commence this lawsuit after learning that EcondoServices
17 had procured insurance for Arboretum through Associated Underwriters of Washington
18 (“AUW”) and that AUW had charged Arboretum undisclosed fees for the purchase of insurance
19 on top of the actual insurance premiums.

20 8. From the beginning of the litigation, Arboretum has taken its commitment to
21 representing the interests of other condominium associations seriously.

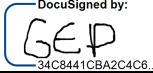
22 9. I and other members of the Arboretum HOA Board devoted approximately 50
23 hours to this litigation. I communicated often with counsel about developments in the case. My
24 co-plaintiffs and I participated in many video conferences with our counsel to discuss the case.
25 Among other things, we provided counsel with documents and information at the beginning of
26 the case and in response to Defendants’ discovery requests. We also worked with an ESI expert
27 to preserve and gather electronic documents and data. I provided a declaration in support of

1 class certification, reviewed counsel’s analysis of class damages both before and after
2 mediation, and participated in the mediation and settlement negotiations. Before the case
3 settled, Defendants had requested dates for my deposition and I was preparing to be deposed.

4 10. Aboretum chose to reject an individual settlement offer in favor of pursuing relief
5 for the whole class of HOAs who paid AUW’s undisclosed fees.

6 I declare under penalty of perjury under the laws of the State of Washington and the
7 United States of America that the foregoing is true and correct.

8 EXECUTED at 5:44 pm, Thursday this 14th day of May, 2026.

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10 By:  _____
11 Grayson Deitering

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CERTIFICATE OF SERVICE

I, Blythe H. Chandler, hereby certify that on May 14, 2026, I caused true and correct copies of the foregoing to be served via the means indicated below:

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- King County Electronic Filing System

Attorneys for Mark Holmes

I declare under penalty of perjury under the laws of the State of Washington and the

1 United States that the foregoing is true and correct.

2 DATED this 14th day of May, 2026.

3 By: /s/ Blythe H. Chandler, WSBA #43387
4 Blythe H. Chandler, WSBA #43387

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