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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 PRISCILLA STOYANOF
IN SUPPORT OF PLAINTIFFS' MOTION
FOR ATTORNEYS' FEES, LITIGATION
COSTS, AND SERVICE AWARDS**

1 I, Priscilla Stoyanof, 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 The Cosmopolitan Condominium
5 Owners' Association ("Cosmopolitan"); I also manage a business that owns a commercial unit
6 located in Cosmopolitan.

7 3. Cosmopolitan is a condominium building located in Seattle.

8 4. Among the services that Cosmopolitan relies on its property management
9 companies such as Kappes Miller to provide is procuring insurance coverage for the
10 condominium.

11 5. Insurance coverage is important to Cosmopolitan and its owners and is often one
12 of Cosmopolitan's most significant operating expenses.

13 6. Cosmopolitan is largely overseen by volunteers. Its Board of Directors consists
14 primarily of condominium unit owners who volunteer their time to run the condominium.
15 These volunteers typically have limited time, financial resources, administrative support, and
16 expertise.

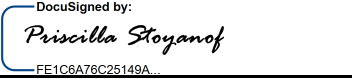
17 7. From the beginning of the litigation, Cosmopolitan has taken its commitment to
18 representing the interests of other condominium associations seriously. Cosmopolitan turned
19 down a significant individual settlement offer so the case could continue on behalf of other
20 condominiums that paid the overcharges.

21 8. I and others, including members of the Cosmopolitan HOA Board, my
22 predecessor Andrew Biggs, and building manager Tom Ichelson, devoted at least 100 hours to
23 this litigation. I communicated often with counsel about developments in the case. My co-
24 plaintiffs and I participated in many video conferences with our counsel to discuss the case.
25 Among other things, Cosmopolitan provided counsel with documents and information at the
26 beginning of the case and in response to Defendants' discovery requests. Cosmopolitan also
27 worked with an ESI expert to preserve and gather electronic documents and data. I provided a

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

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

7 EXECUTED at San Francisco, California this 14th day of May, 2026.

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9 By: 
10 Priscilla Stoyanof

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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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- Electronic Mail
- 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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