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HONORABLE WYMAN YIP
Hearing Date: March 17, 2023
Without Oral Argument

SUPERIOR COURT OF WASHINGTON FOR KING COUNTY

In Re the Matter of:

Case No. 22-4-08326-1 KNT

THE SHARON M. HAROLD
IRREVOCABLE TRUST DATED
NOVEMBER 12, 2004

a Trust.

**DECLARATION OF DAVID A.
PAICE, TRUSTEE, IN SUPPORT OF
MOTION FOR APPOINTMENT OF A
LITIGATION GUARDIAN AD LITEM
FOR SHARON M. HAROLD**

I, David A. Paice, declare as follows:

1. I am the Trustee of the Sharon M. Harold Irrevocable Trust dated November 12, 2004 ("Harold Trust" or "Trust"). I have personal knowledge of the facts set forth herein. I make this declaration based in support of the Motion for Appointment of a Litigation Guardian Ad Litem for Sharon M. Harold ("Motion for Appointment").

2. Sharon Harold's Abrupt Change of Behavior. Up until late September or early October 2022, Sharon Harold, the trustor and primary lifetime beneficiary of the Harold Trust, was supportive of my actions as Trustee of the Trust. In fact, when I spoke with her, Sharon would become agitated and upset that a few of her children were acting inappropriately toward the Trust and making false accusations against me. Attached as **Exhibit A** is a true and correct copy of text messages that I received from Sharon between Wednesday, August 3, 2022 and Thursday, August 18, 2022. Sharon and I generally discussed the accountings that I had provided to her on the telephone, and she made it very clear that she had no problem whatsoever approving the accountings, my actions as Trustee, and releasing and discharging me. Sharon ultimately executed the Release and Discharge document and mailed it back to my attorneys' office.

DECLARATION OF DAVID A. PAICE, TRUSTEE, IN SUPPORT OF
MOTION FOR APPOINTMENT OF A LITIGATION GUARDIAN AD
LITEM FOR SHARON M. HAROLD - 1
No. 22-4-08326-1 KNT

134455.0001/9299312.1

LANE POWELL PC
1420 FIFTH AVENUE, SUITE 4200
P.O. BOX 91302
SEATTLE, WASHINGTON 98111-9402
206.223.7000 FAX: 206.223.7107

3. Sharon's Rescission of the Release and Discharge. In early October 2022, after she had executed the Release and Discharge, Sharon informed my attorneys that she was rescinding the Release and Discharge. This caught me by surprise as Sharon had always, to my knowledge, voiced support for me and my actions as Trustee of the Harold Trust. I believe that Sharon may have been under the influence of one or more of her children, who are residuary beneficiaries of the Harold Trust.

4. Sharon Harold's Durable Power of Attorney Dated October 21, 2022. I was not aware that Charles Harold or Amy Jane Small were appointed as co-attorneys-in-fact for Sharon until Charles Harold filed the Durable Power of Attorney of Sharon M. Harold dated October 21, 2022 as Exhibit A to his declaration made and filed in response to Michelle Blackwell's motion to withdraw.

I declare under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct to the best of my knowledge.

Executed on this 28th day of February, 2023, at Seattle, Washington.

David A. Paice

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7 SUPERIOR COURT OF WASHINGTON FOR KING COUNTY

8 In Re the Matter of:

Case No. 22-4-08326-1 KNT

9 THE SHARON M. HAROLD
10 IRREVOCABLE TRUST DATED
NOVEMBER 12, 2004

GR 17 DECLARATION RE
ELECTRONIC DOCUMENT

11 a Trust.

12 I, Aleksander Schilbach, declare under penalty of perjury under the laws of the State of
13 Washington as follows:

14 1. I am an attorney with the law offices of Lane Powell PC located at 1420 Fifth
15 Avenue, Suite 4200, Seattle, Washington 98101, attorneys for Trustee David A. Paice, and make
16 this declaration pursuant to GR 17(a)(2).

17 2. I received the foregoing electronic signature page and attached to the document
18 entitled *Declaration of David A. Paice, Trustee, In Support of Motion for Appointment of a*
19 *Litigation Guardian ad Litem for Sharon M. Harold* to which this declaration is attached via
20 electronic mail at the following address: schilbacha@lanepowell.com.

21 3. I have personally examined the electronic document and confirm that it is a
22 complete and legible image.

23 4. The electronic document consists of ten (10) pages including this declaration.
24
25
26
27

1 Dated at Seattle, Washington on February 28, 2023.

2 LANE POWELL PC

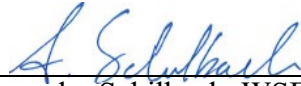
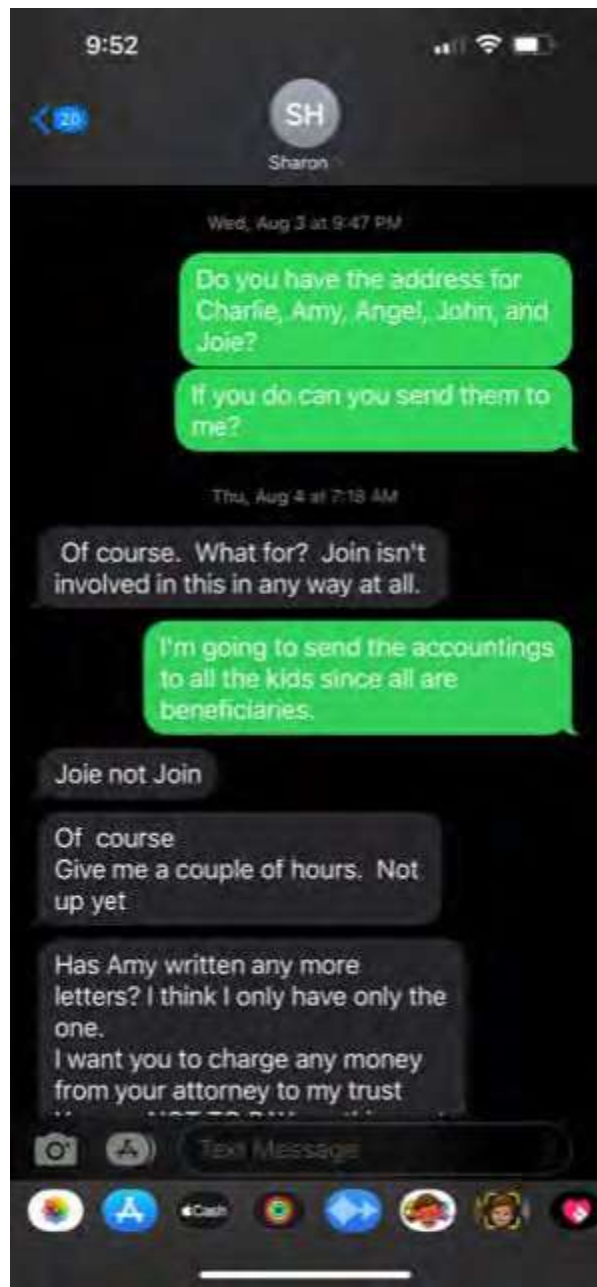
3 By 
4 Aleksander Schilbach, WSBA No. 51693

Exhibit A

Text Messages Between Mr. Paice,
Trustee, and Ms. Sharon Harold



9:52



< 28

SH

Sharon

Wed, Aug 3 at 9:47 PM

Do you have the address for
Charlie, Amy, Angel, John, and
Joie?

If you do can you send them to
me?

Thu, Aug 4 at 7:18 AM

Of course. What for? Joie isn't
involved in this in any way at all.

I'm going to send the accountings
to all the kids since all are
beneficiaries.

Joie not Join

Of course
Give me a couple of hours. Not
up yet

Has Amy written any more
letters? I think I only have only the
one.
I want you to charge any money
from your attorney to my trust



Text Message



9:52



SH

Sharon

Joie not Join

Of course
Give me a couple of hours. Not
up yet

Has Amy written any more
letters? I think I only have only the
one.
I want you to charge any money
from your attorney to my trust
You are NOT TO PAY anything out
of your own pocket. Did you get
a bill from Jeanne at Hathaway
Law?

Thu, Aug 4 at 10:12 AM

Charly: 5301 So Superstition Mt.
Dr
#103-350
Gold canyon, AZ [65119](#)

John Harold
230 Westmont Dr, Reedsport, OR
97467

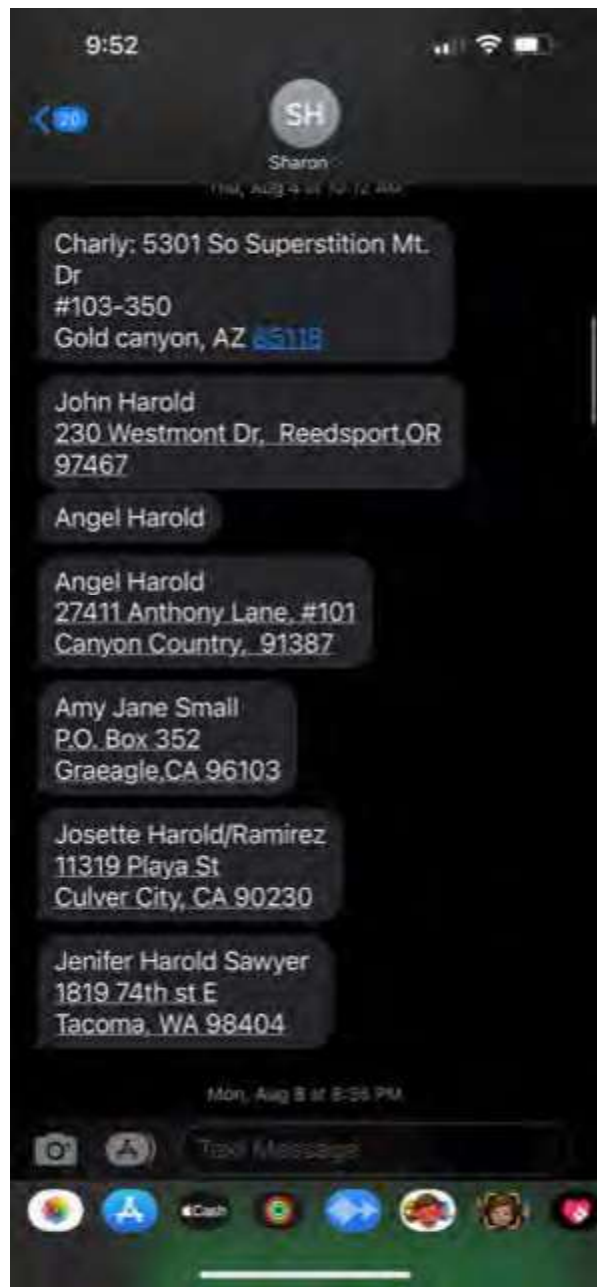
Angel Harold

Angel Harold



Text Message





9:52



SH

Sharon

Josette Harold/Ramirez
11319 Playa St
Culver City, CA 90230

Jenifer Harold Sawyer
1819 74th st E
Tacoma, WA 98404

Mon, Aug 8 at 9:36 PM

Please send me your attorney's
statement

I have received it yet but will send
it when received.

🙏 thanks

Thu, Aug 11 at 9:54 AM

Check out page 7 of my trust.
D. NO CONTEST CLAUSE

Sun, Aug 14 at 6:08 PM

15416621937 Deposited a new
message:
"Yeah. Hi, it's Gibby. Uh give me a
call when you have a chance. I'm
[redacted]"



Text Message



9:52



SH

Sharon

Thu, Aug 11 at 9:54 AM

Check out page 7 of my trust.
D. NO CONTEST CLAUSE

Sun, Aug 14 at 8:08 PM

[15416621837](#) Deposited a new message:
"Yeah. Hi, it's Gibby. Uh give me a call when you have a chance. I'm just going over some of this paperwork and didn't quite understand some of it. Okay. Love you. Bye."
Click here: [14693625006](#) to listen to full voice message.

Thu, Aug 18 at 8:38 PM

I want to sue my 4 kids for parent abuse.

I have deleted Charly, John, Angel & Amy from phone.

Sat, Aug 20 at 4:39 PM

I will mail the attorney bill to you.
It does not photograph well.



Text Message

