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**SUPERIOR COURT OF THE STATE OF WASHINGTON
FOR THE COUNTY OF KING**

In re the Matter of

Case No. 22-4-08326-1 KNT

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

**RESPONDENTS' DISCLOSURE OF
POSSIBLE WITNESSES**

a Trust.

Respondents Charles A. Harold, Jr., John J. Harold, Angel Harold, Amy Jane Small and Josette Ramirez identify the following witnesses who will testify live or by deposition pursuant to King County LCR 26(b):

1. David Paice, Trustee
16644 Marine Drive SW
Burien, Washington

This witness will testify to acts and omissions during his tenure as Trustee of the Sharon M. Harold Irrevocable Trust dated November 12, 2004 (the "Trust").

2. Brieana Paice, Remainderman
16644 Marina Drive SW
Burien, Washington

This witness will testify to her actions and comments with respect to the Trust and beneficiaries thereto.

3. Harmony Harold
975 NW Naito Pkwy
Portland, Oregon

This witness will testify to events she witnessed regarding the Trust and/or beneficiaries involving the acts or omissions of David Paice and/or Brieana Paice.

1 4. Jenifer F. Harold aka Jenifer F. Paduch aka Jenifer F. McWhirter aka
2 Jenifer F. Sawyer
3 1819 74th Street E
4 Tacoma, WA 98404

5 This witness will testify to events she witnessed regarding the Trust and/or
6 beneficiaries involving the acts or omissions of David Paice and/or Brieana
7 Paice.

8 5. Erin Harold
9 808 Reton Ave. S
10 Renton, WA 98057

11 This witness will testify to events she witnessed regarding the Trust and/or
12 beneficiaries involving the acts or omissions of David Paice and/or Brieana
13 Paice.

14 6. Jennie Linda Snell
15 2607 30th Ave. W
16 Seattle, WA 98199

17 This witness will testify as to why David Paice paid her out of the Trust account.

18 7. Carla M. Paice
19 18032 Prairie Pointe Ln SW
20 Rochester, WA 98579

21 This witness will testify to events she witnessed regarding the Trust and/or
22 beneficiaries involving the acts or omissions of David Paice and/or Brieana
23 Paice.

24 8. Richard A. Paice
25 18032 Prairie Pointe Ln SW
26 Rochester, WA 98579

27 This witness will testify to events he witnessed regarding the Trust and/or
28 beneficiaries involving the acts or omissions of David Paice and/or Brieana
Paice.

9. Olivia Middleton
1623 Conant Ave.
Burley, ID 83318

This witness will testify to events she witnessed regarding the Trust and/or
beneficiaries involving the acts or omissions of David Paice and/or Brieana
Paice.

10. Austin Beau Middleton
1054 Sunset Dr.
Gallatin, TN 37066

1 This witness will testify to events he witnessed regarding the Trust and/or
2 beneficiaries involving the acts or omissions of David Paice and/or Briana
Paice.

3 11. Louis G. Sawyer
4 7606 36th St. Ct W, Apt. 4
University Place, WA 98466

5 This witness will testify to events he witnessed regarding the Trust and/or
6 beneficiaries involving the acts or omissions of David Paice and/or Briana
Paice.

7 12. Aleksander Schilbach
8 Lane Powell, PC
1420 Fifth Ave., Suite 4200
9 Seattle, Washington

10 This witness will testify to his telephonic conversations and emails with Grantor
Sharon M. Harold.

11 13. Gary M. Kirk
12 Lane Powell, PC
1420 Fifth Ave., Suite 4200
13 Seattle, Washington

14 This witness will testify as to what he meant when he wrote in an email to
15 Aleksander Schilbach, "Shouldn't we be copying her (Sharon's) attorney?"

16 14. Jeanne M. Kvale
The Hathaway Law Firm, LLP
5450 Telegraph Road
17 Ventura, CA. 93006

18 This witness will testify to the conflict of interest between David Paice and
Sharon M. Harold.

19 15. David Llewellyn, CPA
20 McCord & Llewellyn Accountancy Corporation
1150 Foothill Blvd., Suite G
21 La Canada Flintridge, CA 91011
Tel: (818) 952-1040

22 This witness will testify to the Accounting of Trust submitted by David Paice and
23 what services were requested by Mr. Paice.

24 **Respondents' Experts:**

25 16. As of this date, no experts have been retained by Respondents.

26 Respondents reserve the right to call all witnesses identified by any other party.

27 Respondents reserve the right to call all records custodians as necessary to
28 authenticate records.

1 Respondents reserve the right to call anyone who may give deposition
2 testimony in this case.

3 Respondent reserves the right to call rebuttal witnesses.

4 DATED: October 31, 2023 s/Charles A. Harold, Jr.
5 Charles A. Harold, Jr., Residual Beneficiary and
6 Respondent in pro se
7 1455 N. Tomahawk Rd.
8 Apache Junction, AZ 85119
9 Tel: 818-652-6400 / E-mail: chuckharold@gmail.com

8 DATED: October 31, 2023 s/John Harold
9 John Harold, Residual Beneficiary and
10 Respondent in pro se
11 230 Westmont Dr.
12 Reedsport, OR 97467
13 Tel: (541) 662-6262
14 Email: john6231@live.com

13 DATED: October 31, 2023 s/Angel Harold
14 Angel Harold, Residual Beneficiary and
15 Respondent in pro se
16 26707 Isabella Pkwy Unit 202
17 Canyon Country, CA 91351
18 Tel: (661) 289-4238
19 Email: angelharold25@gmail.com

18 DATED: October 31, 2023 s/Amy Jane Small
19 Amy Jane Small, Residual Beneficiary and
20 Respondent in pro se
21 P.O. Box 352
22 Graeagle, CA 96103
23 Tel: (805) 827-0051
24 Email: aj.harold9@gmail.com

23 DATED: October 31, 2023 s/Josette Harold Ramirez
24 Josette Harold Ramirez, Residual Beneficiary and
25 Respondent in pro se
26 11319 Playa St.
27 Culver City, CA 90230
28 Tel: (310) 280-6229
Email: jobabe007@gmail.com