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IN THE SUPERIOR COURT OF WASHINGTON  
IN AND FOR THE COUNTY OF KING

In re the Matter of

NO. 22-4-08326-1 KNT

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

a Trust.

SUPPLEMENTAL DECLARATION OF  
MICHELLE A. BLACKWELL IN  
SUPPORT OF ALTERNATIVE MOTION  
FOR WITHDRAWAL BY ORDER FOR  
RESPONDENT SHARON M. HAROLD

Michelle A. Blackwell declares:

1. I am or was the attorney of record for Sharon M. Harold in the above-captioned action.
2. I dispute each and every allegation, matter and thing stated in the Declaration of Charles A. Harold filed today in response to the motion for withdrawal by order, except as previously asserted or admitted in my motion and supporting declaration.
3. Since 2015, I was and am a Martindale AV-rated Preeminent Attorney – Judicial Edition. I have practiced law in five (5) States over my 30-year legal career in good standing at all times, with no disciplinary history. I was a partner at an AV-rated law firm for many years before starting my own law firm in 2015.
4. At all material times, I worked diligently and efficiently on behalf of Sharon Harold. All of the terms and conditions and my billable hour rate were disclosed in a writing signed by all parties involved at the inception of the representation. Our law firm's trust deposit policy is expressly stated therein, and Charles Harold was aware and agreed that trust deposits are held in trust and applied to costs and the final bill at the attorney's discretion, and that monthly statements are due in full when presented.

1 5. For a few days in January 2023, I did briefly pause work and require the then-  
2 aged account be brought current because a payment was rejected by my bank and I had a  
3 lot of time in WIP. I had already accommodated one request to apply trust to the aged  
4 account, which I accommodated on the condition the trust be replenished – which never  
5 happened. There was NO prejudice to the client because I promptly acted upon all action  
6 items for me and continued to communicate.

7 6. My file contains all of the usual and customary research, work, notes, pleadings  
8 and correspondence one might expect at this stage of fast track trust litigation. At no  
9 time before today did Charles Harold or Sharon Harold ever object to or question my  
10 work, the amount of my bills, my integrity, the quality of my work, or the time spent.

11 7. Only after I was terminated and instructed to withdraw within two days did I file  
12 the notice of withdrawal and proof of mailing, followed by my motion to withdrawal by  
13 order. I did not seek to withdrawal or indicate a desire to withdrawal before being  
14 terminated. I was surprised at being terminated.

15 8. Before undertaking the representation in October 2023, I inquired about Sharon  
16 Harold's mental and physical health and capacity. I specifically inquired about any  
17 causes or symptoms of dementia, as I do in every case involving an elderly client. I also  
18 personally met alone with Sharon Harold and she presented as alert and oriented. Only  
19 then did I agree to the representation. I later learned that important information had been  
20 withheld from me and that Sharon Harold had in fact suffered a pre-existing significant  
21 head injury which is now a matter of record in this case. This led me to contact my ethics  
22 board and to require another meeting with Sharon Harold before I could do further work.  
23 To that extent, as required by my ethics board, it is accurate to state that I had to "stop  
24 work." Charles Harold terminated my services before I could meet her again.

25 9. There is much more that I would like to tell the court about this matter, but due to  
26 confidentiality I am advised that I may only do so pursuant to an order of the court. If the  
court so orders, I request that I may speak with the Judge in camera so a preliminary  
analysis may be may of what information is relevant and helpful to these matters.

10 10. If Charles Harold truly believes I have done a poor job representing Sharon  
11 Harold, then I do not understand why he wants me to continue to represent her.

12 **I declare under penalty of perjury under the laws of the State of Washington that**  
13 **the foregoing is true and correct.**

14 Dated: February 2, 2023 at Eugene, Oregon.

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16 \_\_\_\_\_  
17 Michelle A. Blackwell

**CERTIFICATE OF SERVICE**

I certify that on February 2, 2023 after 5 pm PST, effective February 3, 2023, I both (1) mailed by US First Class Mail with sufficient postage prepaid and (2) electronically emailed a copy of the foregoing SUPPLEMENTAL DECLARATION OF MICHELLE A. BLACKWELL to the following persons at the following addresses:

<p>Aleksander R. Schilbach, WSBA #51693 Gail Mautner, WSBA #13161 LANE POWELL, PC 1420 Fifth Avenue, Suite 4200 PO Box 91302 Seattle, Washington 98111-9402</p> <p>Of Attorneys for Petitioner-Trustee David A. Paice</p> <p>Email: schilbacha@lanepowell.com, mautnerg@lanepowell.com, webbs@lanepowell.com and docketing@lanepowell.com</p>	<p>Sharon M. Harold 100 River Bend Road, Space #103 Reedsport, OR 97467 Email: smharold7@gmail.com Respondent-Sole Qualified Beneficiary</p> <p>CHARLES A. HAROLD, PRO SE 1455 N. TOMAHAWK ROAD APACHE JUNCTION, AZ 85119 EMAIL: CHUCKHAROLD@GMAIL.COM Residuary Beneficiary</p>
<p>John J. Harold 230 Westmont Dr. Reedsport, OR 97467 Tel: (541) 662-6262 Email: john6231@live.com Residuary Beneficiary</p> <p>Amy Jane Small P.O. Box 352 Graeagle, CA 96103 Tel: (805) 827-0051 Email: aj.harold9@gmail.com Residuary Beneficiary</p> <p>Angel Harold 9317 Balcom Ave. Northridge, CA 91325 Tel: (661) 289-4238 Email: angelharold25@gmail.com Residuary Beneficiary</p>	<p>Josette Harold Ramirez 11319 Playa St. Culver City, CA 90230 Tel: (310) 280-6229 Email: joebabe007@gmail.com Residuary Beneficiary</p> <p>Jenifer Sawyer 1819 74th St. E Tacoma, WA 98404 E-mail: send2jen3@hotmail.com Residuary Beneficiary</p> <p>Nicole Loomis 31688D U.S. 97 Tonasket, WA 98855 E-mail: nikkiloomis20@gmail.com Residuary Beneficiary</p>

1 Pursuant to CR 5(b)(7), electronic service was consented to in writing by the  
2 Trustee's attorney.

3  
4 BLACKWELL LAW, PC

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