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

RICHARD C. WERTH,

Plaintiff,

vs.

DEBORAH COX-KNODEL and TED
KNODEL, wife and husband and the
marital community composed thereof,
MARA SARGENT and JOHN DOE
SARGENT, wife and husband and the
marital community composed thereof; and
JOHN DOES 1-5,

Defendants.

No. 04-2-40909-8 SEA

**DECLARATION OF JAMES P.
MCGOWAN
RE: DECLARATIONS IN
SUPPORT OF REPLY TO
DEFENDANT KNODEL'S
MOTION FOR SUMMARY
JUDGMENT**

I, **James P. McGowan**, declare and state as follows

1. I am the attorney for the defendants in the above-entitled action. I make this declaration based upon my own personal knowledge and belief.
2. Attached hereto are two original signed declarations of the signed facsimiled copies that were attached to Defendant Knodel's Reply and filed on January 16, 2007 from the following declarants:
 - a. Declaration of Stella Padbury, dated January 11, 2007;
 - b. Declaration of Teresa Hopkins, dated January 11, 2007.

DECLARATION OF JAMES P. MCGOWAN
RE: DECLARATIONS IN SUPPORT OF REPLY TO DEFENDANT
KNODEL'S MOTION FOR SUMMARY JUDGMENT - 1

HOLLENBECK, LANCASTER, MILLER & ANDREWS
15500 SE 30th Place, Suite 201
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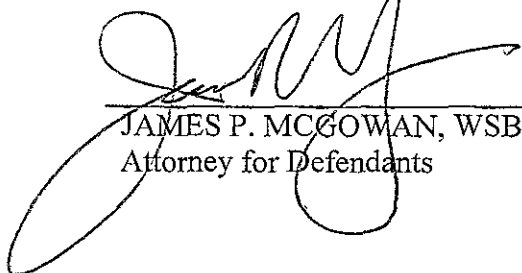
Employees of the Claims Litigation Department,
Farmers Insurance Exchange and Affiliates

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3. Also attached hereto is the signed facsimiled declaration of Defendant Deborah Cox, dated January 16, 2007, which was unsigned when filed with Defendant Knodel's Reply on January 16, 2007.

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

SIGNED in Bellevue, Washington, this 17 day of January, 2007



JAMES P. MCGOWAN, WSBA # 04855
Attorney for Defendants

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JAN 16 2007

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

RICHARD C. WERTH,

Plaintiff,

vs.

DEBORAH COX-KNODEL and TED
KNODEL, wife and husband and the
marital community composed thereof,
MARA SARGENT and JOHN DOE
SARGENT, wife and husband and the
marital community composed thereof; and
JOHN DOES 1-5,

Defendants.

No. 04-2-40909-8 SEA

**DECLARATION OF STELLA
PADBURY**

I, **Stella Padbury**, declare and state as follows:

1. I live at 17 Jensen Road, Eastbound, WA 98245
2. I have known Deborah Cox for over six years and developed a friendship with her that began through my friendship with Deborah's sister, Annette Deon.
3. On December 31, 2001, I attended the New Years' Eve party at the Sargents' home.

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4. Deborah Cox and Richard Werth stayed for the weekend—the night before the New Year’s Eve party and the night after—at my cottage which is within eyesight of my own home.

5. Upon their arrival at my home the first evening, Richard Werth was introduced to me as Deborah’s boyfriend.

6. At the New Year’s Eve party, I witnessed a romantic display of affectionate between Richard and Deborah.

5. Richard and Deborah engaged in kissing and hugging.

6. Following their stay at my cottage, I observed that only one bed had been slept in.

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

SIGNED in Easton (city), Washington, this 11 of January, 2007.


Stella Padbury

JAN 16 2007

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

RICHARD C. WERTH,
Plaintiff,

vs.

DEBORAH COX-KNODEL and TED
KNODEL, wife and husband and the
marital community composed thereof,
MARA SARGENT and JOHN DOE
SARGENT, wife and husband and the
marital community composed thereof; and
JOHN DOES 1-5,
Defendants.

No. 04-2-40909-8 SEA

**DECLARATION OF TERESA
HOPKINS**

I, Teresa "Misa" Hopkins, declare and state as follows:

1. I live at 6660 Delmonico Drive, #479, Colorado Springs, CO 98660.
2. I have known Deborah Cox and Ted Knodel since before their separation in June 2001.
3. I teach classes on sound healing. I first met Deborah and Ted before their separation and they expressed interest in taking a class with me at some point.

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

RICHARD C. WERTH,

Plaintiff,

vs.

DEBORAH COX-KNODEL and TED
KNODEL, wife and husband and the
marital community composed thereof,
MARA SARGENT and JOHN DOE
SARGENT, wife and husband and the
marital community composed thereof; and
JOHN DOES 1-5,

Defendants.

No. 04-2-40909-8 SEA

**SUPPLEMENTAL
DECLARATION OF DEBORAH
COX IN SUPPORT OF MOTION
FOR SUMMARY JUDGMENT**

I, Deborah Cox, declare and state as follows:

1. I am over the age of eighteen, competent to testify herein, and base the following upon my personal knowledge and observations.
2. Following my separation in June 2001 from Ted Knodel, I became involved with Richard Werth.
3. Attached is a true and accurate copy of the e-mail sent to me by Richard Werth on September 28, 2001.

SUPPLEMENTAL DECLARATION OF DEBORAH COX IN SUPPORT OF
MOTION FOR SUMMARY JUDGMENT - 2

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