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October 30, 2017

VIA EMAIL AND USPS

Ms. Emily Studebaker, Esq.
Hall Render Killian Heath & Lyman, P.C.
600 108th Ave NE, Suite 320
Bellevue, WA 98042

Dear Ms. Studebaker:

I am writing in response to your letter of October 20, 2017. My apologies for the delay in responding, which resulted mainly from my being out of the office.

As to your renewed request for scheduling of the annual members meeting, the Board of Directors has already called one special meeting to reconsider this subject (i.e., consider it for a second time). The outcome of that special meeting has been communicated to you previously. Scheduling of a second special meeting to reconsider the same topic (for a third time) is unlikely, but the Board does plan to revisit the question in its December 8 meeting.

As to your request to inspect Board minutes, the corporation will certainly comply with its legal obligations. I note that your letter did not state a "proper purpose" for the inspection as required by the Bylaws and the statute. We would appreciate it if you would supplement your request in this regard (by email would be fine).

In an effort to keep the inspection process moving, the corporation has begun assembling the materials mentioned in your request. I have reviewed the Board minutes and consents that have been assembled. But assembly of all of the committee minutes is proving to be more of a challenge, and at this point all I can do is estimate that this part of the process should be finished no later than the end of this week.

Based on my review of the Board minutes, it looks like the copying cost will be about \$119.50 if you want a copy of those minutes to be provided as you have requested. This amount would need to be paid in advance. Alternatively, if Dr. Larson would prefer to inspect the Board minutes in person and designate only a portion of them for copying, we can proceed in that manner.

Please let me know how you wish to proceed relative to payment of copying costs for the Board minutes. I will give you the estimated copying costs for the committee minutes once those have been assembled and reviewed. Again, apologies for the delays.



Ms. Emily Studebaker
October 30, 2017
Page Two

To be clear, neither this letter nor our efforts to accommodate your request should be deemed an admission (or waiver) by WDS as to any legal obligations (or limitations thereon) pertaining to inspection or copying of its corporate records. Any such obligations remain governed solely by the corporation's Bylaws and governing statute.

Very truly yours,

DLA Piper LLP (US)

A handwritten signature in blue ink, appearing to read 'John M. Steel'.

John M. Steel

JMS:mjh