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

BEACON CHARTERS AND RV)
PARK, LLC, FKA BEACON RV PARK)
Plaintiff,)
v.)
LAWRENCE BERGQUIST,)
and all other occupants, 332 Elizabeth Av SE)
space 40, Ilwaco, WA 98624;)
Defendants.)

Case No. 22-2-00135-25
DECLARATION IN SUPPORT OF
RESPONSE IN OPPOSITION TO
DEFENDANT'S MOTION
FOR PRELIMINARY INJUNCTION
supplemental

I, Lelani Rabi, declare as follows:

1. I hold a position of the Chief Operating Officer at Deer Point Meadows Investments, LLC.
2. As such I am familiar with the matters related to the ownership and operation of the Beacon RV Park, since Deer Point manages Beacon RV Park.

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CERTIFICATE OF SERVICE

I hereby certify that on October 28, 2022, I served the foregoing Declaration on the party(s) listed below by the method described below:

- Facsimile**

- U.S. Mail, postage prepaid**
Last known address:
Sebastian Miller, WA AAG
Washington State Attorney General
800 Fifth Avenue, Suite 2000
Seattle WA 98104

Robina Rayamajhi
Thurston County Volunteer Legal Services
P.O. Box 405
Olympia, WA 98507

- Hand delivered in Court:**

DATED: October 28, 2022

/s/ Robert S. Phed

Mark G. Passannante, WSBA#
Robert S. Phed, WSBA# 42399
Of Attorneys for Defendants

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3. Beacon had no notice of the rodent infestation problem until the issue was brought up recently. Beacon has contacted a pest control company and will begin rodent treatment.

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

Signed in Vancouver WA, on October 28, 2022



Lelani Rabi.