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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

I, Craig Hawkinson, Jr. , declare as follows:

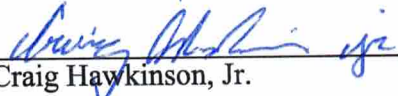
1. I am one of the employees of Ford Electric Co, Inc..
2. As such I am familiar with the matters related to the evaluation of the electrical conditions at Beacon RV Park.
3. I have 15 years of experience as an electrician and I am competent to offer opinions on the subject matter of electrical work and compliance with applicable laws and regulations related to electrical work.
4. On October 7, 2022 I emailed my evaluation to Mr. Matt Gagliasso, CEO of Deer Point Meadows Investments, LLC.

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5. A copy of the email is attached hereto as Exhibit 1.

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

Signed in 10/27/2022 WA, on October 27, 2022



Craig Hawkinson, Jr.

EXHIBIT 1

From: Ford Electric
Sent: Friday, October 7, 2022 5:51 PM
To: Matt Gagliasso
Subject: Beacon RV

To whom it May concern,

This is a follow up to the inspection Ford electric gave of the current electrical infrastructure at the Beacon RV Park. The list provided of the sites at the Beacon show numerous safety hazards and inadequate electrical equipment. We would highly recommend taking care of all electrical issues inside the park as soon as possible.

If you begin to fix these issues inside the park, this would also require you to bring several other things up to code. Once you start fixing feeders and rv pedestals inside the park, you will be required by National Electric Code (551.71 C) to upgrade a minimum of 20% of the services up to 50 amp sites. Currently the park has no 50 amp rv sites.

The Pacific County PUD requires that all services that install additional load be upgraded and installed to their requirements. This includes the requirement of installing all service equipment of stainless steel type and all services underground.

As you can see this would be a very large undertaking to bring this park up to code. Ford Electric would only be able to do this work with the park emptied, and the proper safety fencing installed to insure there is no risk or liability to others once the project commenced. The scope of work would need to be completed at the same time as you would not be able to do work in sections.

Please let our office know if you have any questions

--
And Don't Forget..... 2022 is going to be our BEST YEAR YET!!!

Best regards,
Team Ford

Ford Electric CO., INC.
Same Family Business "Since 1944"

Office Tel 360 - 642 - 2137
Office Fax 360 - 642 - 3573

Company Website: <http://fordelectric.us/>
Company e-mail: ford.electric.inc@gmail.com

Mailing Address: PO Box 206,
Long Beach WA. 98631

Shipping Address: 105 3rd St. S.E.
Long Beach WA. 98631

Matt Gagliasso
CEO
Deer Point Meadows Investments

T: (360) 253-5603
E: matt@deerpointmeadows.com



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1 **CERTIFICATE OF SERVICE**

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

4
5 **Facsimile**

6
7 **U.S. Mail, postage prepaid**
8 Last known address:
9 Sebastian Miller, WA AAG
10 Washington State Attorney General
11 800 Fifth Avenue, Suite 2000
12 Seattle WA 98104

13
14 Robina Rayamajhi
15 Thurston County Volunteer Legal Services
16 P.O. Box 405
17 Olympia, WA 98507

18 **Hand delivered in Court:**

19
20 DATED: October 28, 2022

21 */s/ Robert S. Phed*

22
23 _____
24 Mark G. Passannante, WSBA#
25 Robert S. Phed, WSBA# 42399
26 Of Attorneys for Defendants