



CITY OF PUYALLUP

Office of the City Attorney

Puyallup City Hall
333 South Meridian
Puyallup, WA 98371
Civil Division (253) 841-5598
Criminal Division (253) 841-5552
Facsimile (253) 770-3352

DECLARATION OF MAILING
On this 8th day of April, 2015,
the undersigned mailed to Chris Van Vechten
a properly stamped and addressed envelope con-
taining the document to which this declaration is
affixed. I declare under penalty of perjury under
the laws of the State of Washington that the
foregoing is true and correct.

at Duvalg-lamb

April 1, 2015

Chris Van Vechten
Attorney at Law
2501 East "D" Street, Space 211
Tacoma, WA 98421

**RE: PRE TRIAL NOTICE OF WITNESSES, PLAINTIFF'S REQUEST FOR
DISCOVERY AND DEFENDANT'S DISCOVERY.**

CITY OF PUYALLUP v. [REDACTED]

Dear Mr. Van Vechten:

I. Enclosed please find a copy of our complete file on the above named defendant. If applicable to this case, all breath test related records and materials can be accessed from the Washington State Patrol via the following website, to-wit: <http://breathtest.wsp.wa.gov/welcome.htm>.

II. **PLEASE NOTE THE FOLLOWING:** Please be advised that 911 recordings and jail booking area videos containing information relevant to these proceedings may exist but **may be deleted in the ordinary course of business**. For example, jail video and 911 calls are routinely erased every 60 and 90 days, respectively. Please note that Puyallup Jail does not have recording equipment in the BAC processing area. As of January 2014, Puyallup Police Department no longer uses in-car cameras. If you wish to obtain a copy of a jail booking area video, please forward your written request to the Puyallup Police Department, c/o Nichole McNiven, 311 West Pioneer, Puyallup, WA 98371. You may also fax the request to Ms. McNiven at (253) 770-3362. To preserve the 911 recording or any other tape recording and/or radio transmission, please submit your written request to my office (email/telephonic requests are not acceptable) prior to the pretrial conference date.

III. If your client will be seeking an evaluation from a treatment agency, the documentation needed to complete the evaluation (e.g., police report, criminal history, driving abstract) should be provided to the agency by your office and the agency should not contact the court or the prosecutor's office for this information.

IV. In addition to the citing and/or arresting officer, the City may call as a witness any person listed in any of the documents provided as discovery, as well as a Washington State Trooper BAC Technician, a State Toxicologist, a City Evidence Technician, a fingerprint analyst, and a records custodian from the Puyallup Communications Center.