

# HENDRICKS & LEWIS

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Dear Laurie:

Thanks for your March 26, 2001 response to my letter of March 22, 2001. It's good to hear from you.

From your letter, it seems that you have made headway relating to the securities issues. However, my principal concern is with the preparation and prosecution of the City's case for relief from its exposure to ground lease and operation and maintenance payments. Your assurance "that the developers are more concerned with our efforts than they are with the efforts of the investigative reporters" is reassuring. Nevertheless, I remain concerned that the City's discovery against the developers and Robideaux doesn't seem to have progressed significantly beyond the requests we filed some time ago and Justice Murphy's ruling that document discovery wasn't stayed by *RPS v. Miggins*. I note, moreover, that the developers have objected to most of the City's document requests on the grounds that the requests are no longer supported by the "allegations contained in the Second Amended Complaint." If the developers substantially prevail on that position, full disclosure won't occur and Mayor Powers' promise to obtain "full disclosure" will seem hollow. I have similar concerns about the collection of information from City officials and employees. Has that process begun? Can you share with me your strategic thoughts on that topic?

Good luck on discovery. Let me know if I can help.

Sincerely,

HENDRICKS & LEWIS



O. Yale Lewis, Jr.

cc: Mayor John Powers