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SUPERIOR COURT OF THE STATE OF WASHINGTON
IN AND FOR THE COUNTY OF THURSTON

Case No. 17-2-01546-34

STATE OF WASHINGTON,

Plaintiff,

v.

TIM EYMAN et al.,

Defendants.

NOTICE OF APPEAL TO THE SUPREME
COURT OF WASHINGTON

Comes now Defendants Tim Eyman and Tim Eyman, Watchdog for Taxpayers LLC (collectively "Eyman" unless otherwise stated), and undersigned attorneys Richard B. Sanders and Carolyn A. Lake of Goodstein Law Group PLLC and Seth S. Goodstein of ROI Law Firm, PLLC, and files this Notice of Appeal, to appeal the following final Orders issued by the Trial Court in this matter, ("Final Orders") on the dates as shown:

2/10/2021	Findings of Fact and Conclusions of Law and Injunction
4/16/2021	Order Granting Plaintiffs' Fee Petition
4/16/2021	Judgment
6/15/2021	Order Denying Defendant Motion for Reconsideration

Eyman also appeals at least the following additional rulings by the Trial Court ("Additional Rulings"), issued by the Trial Court in this matter, which issued on the dates as shown:

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1	3/16/2018	Order Granting Motion to Adopt Special Master's Recommendation and Assess Contempt Sanctions
2	8/21/2018	Order Denying Defendant's Motion for Protective Order
3	8/21/2018	Order Granting Plaintiff's Discovery Motion No. 11
4	9/07/2018	Order Denying Eyman Motion for Reconsideration of Order on Bank Records
5	10/31/2018	Order Denying Defendants' Third Motion to Purge Contempt
6	9/13/2019	Order Granting Plaintiff's Motion for Non-Monetary Sanctions
7	10/2/2019	Order Denying Defendant's Motion for Reconsideration
8	2/21/2020	Order Granting Plaintiff's Motion for Partial Summary Judgment
9	3/13/2020	Order Denying Defendant Motion to Reconsider Partial Summary Judgment and Revised Order of September 13, 2019
10	6/5/2020	Denying Defendant Eyman's Motion to Vacate Discovery Order and Summary Judgment

8 Copies of the Final Orders subject of this appeal are attached hereto as **Exhibit A**;
9 copies of Additional Rulings are attached hereto as **Exhibit B**.

10 Eyman also appeals all other Trial Court rulings which violate his First Amendment
11 freedom to associate with others to advance their views. This freedom of association creates a
12 privilege against disclosure to the government of the identity of the associates. The United
13 States Supreme Court has "recognized the vital relationship between freedom to associate and
14 privacy in one's associations." *NAACP v. Patterson*, 357 U.S. 449, 462 (1958). Eyman appeals
15 all Trial Court rulings which violate this freedom to associate, and which coerced the disclosure
16 of Mr. Eyman's associates and their donations to and in support of Mr. Eyman. These Trial
17 Court rulings ("First Amendment Violation Rulings") denied Eyman and Eyman associates the
18 protections afforded by First Amendment associational privileges and the Trial Court erred in so
19 ruling as Eyman and associates met their threshold burden to show the disclosure of the
20 financial records is presumed to chill, and thus harm, First Amendment rights. A party "[meets]
21 their threshold burden of showing some probability of a constitutional infringement" if the
22 disclosure involves financial records of political activities. This is exactly what the First
23 Amendment associational privileges were meant to protect. These First Amendment Violation
24 Rulings include but are not limited to certain Additional Rulings and rulings listed in the attached
25 **Exhibit C** and which issued on the dates shown.

1 Pursuant to RAP 5.3, Eyman states as follows:

- 2 1. The Parties seeking review are specified: Defendants Eyman, and undersigned
3 attorneys Richard B. Sanders and Carolyn A. Lake of the Goodstein Law Group,
4 PLLC and Seth S. Goodstein of ROI Law Firm, PLLC.
- 5 2. The Decisions for which Defendants seek review are the Final Orders and Additional
6 Rulings as defined herein, copies are attached as **Exhibit A** and **Exhibit B** as well
7 as the Trial Court's First Amendment Violation Rulings, as defined herein;
- 8 3. Appeal is taken to the Supreme Court of Washington.
- 9 4. The name and address of attorneys for each party as required by RAP 5.3(c) are:

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DATED this 15th day of July 2021.

GOODSTEIN LAW GROUP PLLC

By: s/Richard B. Sanders
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Carolyn A. Lake, WSBA No. 13980
Attorneys for Defendants Eyman