

THE HONORABLE BRUCE W. HILYER

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

SERVICE EMPLOYEES
INTERNATIONAL UNION 775,
WASHINGTON PUBLIC EMPLOYEES
ASSOCIATION/UFCW Local 365,
SERVICE EMPLOYEES
INTERNATIONAL UNION Local 925,
SERVICE EMPLOYEES
INTERNATIONAL UNION DISTRICT
1199NW, INLANDBOATMEN'S UNION
OF THE PACIFIC/ILWU, UNITED FOOD
AND COMMERCIAL WORKERS Local
21, WASHINGTON STATE NURSES
ASSOCIATION, INTERNATIONAL
FEDERATION OF PROFESSIONAL &
TECHNICAL ENGINEERS Local 17

Plaintiffs,

v.

STATE OF WASHINGTON, OFFICE OF
FINANCIAL MANAGEMENT, and STEVE
MCLAIN, Director of Labor Relations, in
his official capacity,

Defendant.

No. 07-2-05431-6 SEA

**DECLARATION OF KENT
STANFORD IN SUPPORT OF
PLAINTIFFS' MOTION FOR
PRELIMINARY INJUNCTION**

DECLARATION OF
KENT STANFORD

1 I, Kent Stanford, declare and state as follows:

2 1. I reside in Tumwater, Washington.

3 2. I am a Natural Resource Worker II employed by the Washington state Department
4 of Natural Resources and a member of WPEA/UFCW Local 365.

5 3. I was a member of WPEA's Collective Bargaining Support Committee and the
6 WPEA bargaining team for both the current (2005-2007) and the successor (2007-2009)
7 General Government Master Agreement ("CBA") with the State of Washington.
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9 4. For each of the two contracts, I became a member of the bargaining team to
10 contribute my views of what our members wanted in the CBA. My views have
11 developed over time from the events I have experienced on my job with DNR, as well as
12 my experiences as a job representative (WPEA's title for what other unions refer to as
13 "shop steward"). As a member of WPEA's bargaining team, it was expected by my
14 fellow union members that I would make every effort to assure we received a contract to
15 better the wages, benefits and working conditions of not only DNR bargaining unit
16 members but all WPEA General Government members.
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18 5. In the course of negotiations for both the 2005-2007 CBA and the 2007-2009
19 CBA I was frequently required to express my views forcibly, occasionally very forcibly,
20 because management adamantly opposed issues of the most importance to WPEA
21 members. Should comments I made in the heat of negotiations be available for review by
22 the public I would hesitate to express myself so openly in future negotiations.
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24 6. I believe that the outcome of stifling thoughts and feelings—both my own and
25 those of others on both sides of the bargaining table—would be a dilution of the entire
26

DECLARATION OF
KENT STANFORD

1 negotiation process, where "form" became at least as important, if not more important,
2 than dynamic, substantive negotiations.
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4 I certify under the penalty of perjury under the laws of the State of Washington
5 that the foregoing is true and correct.
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8 Signed in Olympia, Washington, this 19 day of February, 2007.
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11 KENT STANFORD
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DECLARATION OF
KENT STANFORD