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

JENIFER K. DEMARRE & RYAN A. DEMARRE,

Plaintiffs,

vs.

MUTUAL OF ENUMCLAW INSURANCE
COMPANY,

Defendant.

NO. 21-2-10304-5 SEA

**DECLARATION OF RYAN DEMARRE IN
SUPPORT OF PLAINTIFFS' MOTION FOR
ATTORNEYS' FEES, COSTS, AND SERVICE
AWARDS**

I, Ryan Demarre, declare as follows:

1. I am Ryan Demarre. I make this declaration based on my personal knowledge.
2. My wife Jennifer Demarre and I are the class representatives in this case.
3. My wife and I were both deposed in this case and spent numerous hours working with our class counsel to obtain the positive result achieved on behalf of the class.
4. We forwent our own personal interest and individual claims in this case to ensure that as many people as possible obtained relief. We understood that pursuing this case as a class action could provide relief to thousands of class members but might also result in a personal recovery less than we might obtain in an individual action. We chose to pursue this as a class action knowing that it would likely take longer than if it were pursued on an individual


1 basis. We were willing to do this because of the greater impact pursuing this case as a class
2 action might have.

3 5. We have worked hard to ensure that our attorneys had the information they
4 required to prosecute this case and spent hours working with our attorneys to respond to
5 discovery. Prior to the filing and during the course of this case, we helped research the facts
6 underlying the claims and spent money working with a public adjuster whose report on our
7 individual circumstances helped prosecute this action on behalf of the class.

8 6. We took time from work to be deposed and spent hours after work preparing
9 discovery responses and preparing to be deposed.

10 7. We believe that the settlement obtained on behalf of the class was significant
11 and we are proud of the results we helped achieve.

12 I declare under penalty of perjury of the laws of the State of Washington that the
13 foregoing is true and correct, and that this declaration was executed in Coeur d'Alene Idaho, on
14 this 20th day of January, 2023.

15 By: 
16 Ryan DeMarre (Jan 20, 2023 14:04 PST)

17 Ryan Demarre
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