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BEFORE THE HEARING EXAMINER
FOR CITY OF REDMOND

In the Matter of the Appeal of)
)
Dr. John Brunzman)
)
Of the August 22, 2017)
Relocation Claim Determination)
Related to property at)
16145 NE Cleveland Street, Redmond)

NO.
CITY OF REDMOND’S DESIGNATION OF
WITNESSES AND EXHIBITS

Pursuant to the Hearing Examiner’s Order Setting Hearing and Pre-Hearing Document Exchange Schedule dated November 3, 2017, and subsequent Order Setting Response Schedule on Receipt of Appellant’s Motion to Dismiss, Respondent City of Redmond hereby submits the following Designation of Witnesses and Exhibits.

WITNESSES

Debby Wilson
Real Property Manager
City of Redmond
c/o Ogden Murphy Wallace PLLC
901 Fifth Avenue, Suite 3500
Seattle, WA 98164
(206) 447-7000

1 Ms. Wilson is the Real Property Manager for the City of Redmond, and may testify
2 regarding the decisions made and actions taken regarding the relocation claim at issue here, as
3 well as the general circumstances surrounding the issues in this matter.

4 Respondent City of Redmond reserves the right to call for testimony any witness
5 identified by Petitioner.

6 **EXHIBITS**

7 **EXHIBIT NO.**

8 **DESCRIPTION**

- 9 1. 04/11/2012 Letter, Debby Wilson to Dr. Brunzman Re: Redmond's
10 Downtown Central Park, with attached lease.
11 Advises Dr. Brunzman of relocation rights.
- 12 2. 10/10/2012 Letter, Debby Wilson to Dr. Brunzman Re: Redmond
13 Downtown Central Park, Vacate Notice.
14 Terminates occupancy rights because of failure to execute new lease and
15 failure to pay rent.
- 16 3. 05/24/2013 Letter, Debby Wilson to Dr. Brunzman Re: Redmond's
17 Downtown Central Park, 16146 Cleveland Street.
18 Advises Dr. Brunzman that demolition is scheduled to begin in June 2013.
- 19 4. 5/29/2013 Mtg. Notes Re: meeting with Dr. Brunzman, Martyn Daniel,
20 Debby Wilson, Jonathan Fast (Aldrich & Associates), and Michael Wager
21 (The Wager Group), including estimates.
22 This is the document that Judge Spearman found to be a timely claim for
23 relocation benefits.
- 24 5. 06/04/2013 email, Martyn Daniel to Debby Wilson and Steve Reinhart Re:
25 Dr. Brunzman.
26 Estimates interim costs at \$42,000 for rent and tenant improvements.
6. 08/02/2013 Request for Assistance, Michelle Love, VFW Post 91, to the
Mayor of Redmond, with handwritten note from Dr. Brunzman delivering
key.
Represents that Dr. Brunzman vacated the subject premises on July 30,
2013.
7. 08/14/2013 Letter, Steve Reinhart of Universal Field Services, Inc. to
Redmond FCA, P.C. Re: Relocation of Redmond FCA, P.C.
Offers Dr. Brunzman \$640,000 as full and final satisfaction of his
relocation claim.

- 1 8. 08/29/2013 Photographs of subject space.
2 Show furniture, equipment, and office supplies that remained in subject
3 space on day City received the key.
- 4 9. 12/22/2014 Letter, Debby Wilson to Dr. Brunzman Re: Redmond's
5 Downtown Central Park, 16146 NE Cleveland Street, Submittal of Final
6 Relocation/Reestablishment Claim Documents.
7 Advises that the deadline for making a relocation claim is January 31,
8 2015.
- 9 10. 03/10/2017 Order Granting in Part and Denying in Part Petitioner John
10 Brunzman's Motion for Partial Summary Judgment, King County Superior
11 Court No. 16-2-23879-3.
12 Requires City to process Dr. Brunzman's timely submitted claim.
- 13 11. 3/21/2017 Email, Stacy Goodman to Aaron Riensche Re: Brunzman v.
14 City of Redmond.
15 Advises that any updates from Dr. Brunzman will be provided within
16 thirty days.
- 17 12. 03/23/2017 Letter, Debby Wilson to Dr. Brunzman Re: Relocation
18 Assistance/Relocation Claim Request, Redmond Downtown Park, 16146
19 NE Cleveland Street.
20 Asks Dr. Brunzman to provide any updates to his claim by May 1, 2017.
- 21 13. 05/01/2017 Letter, Todd Wyatt to City of Redmond Re: Relocation
22 Assistance.
23 Submits updated cost estimates.
- 24 14. 07/06/2017 Letter, Aaron Riensche to Todd Wyatt Re: Foot Care
25 Associates/Brunzman/City of Redmond.
26 Requests additional information needed to process claim.
15. 08/15/2017 Letter, Todd Wyatt to City of Redmond Re: Foot Care
Associates/Brunzman/City of Redmond.
Provides invoices from The Wager Group Inc. and Martyn Daniel LLC.
16. 08/23/2017 Letter, Aaron Riensche to Todd Wyatt Re: Brunzman
Relocation Benefits Determination.
Forwards City's final determination letter to Dr. Brunzman's attorneys.
17. 08/22/2017 Letter, Debby Wilson to Dr. Brunzman Re: Relocation Claim
Determination.
Advises Dr. Brunzman that the City has approved his relocation claim in
the amount of \$92,346.10.

1 18. 08/31/2017 Letter, Debby Wilson to Todd Wyatt Re: Redmond
2 Downtown Park, Relocation/Reestablishment Claim – Check, Foot Care
Associates, 16146 NE Cleveland Street.

3 Remits payment of relocation benefits in the amount of \$92,346.10.

4 19. 10/16/2017 Letter, Todd Wyatt to City of Redmond and Aaron P.
5 Riensche Re: Foot care Associates/Brunsmann/City of Redmond – Notice
of Appeal.

6 Appeals City’s benefits determination.

7 Respondent City of Redmond reserves the right to use any exhibits designated by
8 Petitioner.

9 The Hearing Examiner’s order instructed the City to include its “Staff report” among its
10 exhibits. The City considers Exhibit 15 to be the document that most closely approximates a
11 “Staff report” in this action.

12
13 DATED this 15th day of December, 2017.

14 OGDEN MURPHY WALLACE, P.L.L.C.

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16 By s/Aaron P. Riensche
17 Aaron P. Riensche, WSBA #37202
18 Attorneys for Defendant
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