

Appellant's Exhibit 21

(as referenced in June 30, 2017

Appellant WPDC Cleveland LLC's Witness and Exhibit List)

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**BEFORE THE HEARING EXAMINER
FOR THE CITY OF REDMOND**

In the Matter of the Appeal of
WPDC Cleveland LLC
of approved Building Permit authorizing
alterations to the structure at 16390 Cleveland
Street, Redmond, issues February 17, 2017

**BLDG-2016-09802
BPLN-2016-02092**

DECLARATION OF SEAN MILLER
IN SUPPORT OF RESPONDENT
ANDORRA VENTURES LLC'S
DISPOSITIVE MOTION TO DISMISS
ERRORS OF PROCEDURE, FACT
AND LAW NOS. 1 THROUGH 6, 8, 9,
AND 13.

I, Sean Miller, am a citizen of the United States, resident of the State of Washington,
and declare and state under the penalty of perjury under the laws of the State of Washington, as
follows:

1. I am a member of Andorra Ventures LLC ("Andorra"), the Respondent in the
above-captioned matter, am competent to testify, and have personal knowledge of the matters
asserted herein. This declaration is made in support of Support of Respondent Andorra
Ventures LLC's Dispositive Motion To Dismiss Errors Of Procedure, Fact And Law Nos. 1
Through 6, 8, 9, And 13. Plaintiff's Motion for Partial Summary Judgment.

2. Andorra purchased the building located at 16390 Cleveland Street, Redmond,
Washington, which is the subject of the above-captioned matter, in November 2016.

3. At the time Andorra purchased the Building, the space was leased and occupied
by tenant Raparatur LLC, under a lease whose term ran from April 16, 2012, through May 15,
2017.

DECLARATION OF SEAN MILLER IN SUPPORT
OF RESPONDENT ANDORRA VENTURES LLC'S
DISPOSITIVE MOTION TO DISMISS ERRORS OF
PROCEDURE, FACT AND LAW NOS. 1
THROUGH 6 8 9 AND 13- Page 1 of 2

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4. Andorra terminated the lease early on February 15, 2017, when Andorra began our process for making tenant improvements.

DATED this 25 day of April, 2017, in Seattle, Washington.



Sean Miller, Member
Andorra Ventures LLC

156-1 Declaration of Sean Miller in Support of Motion to Dismiss 4-26-2017

DECLARATION OF SEAN MILLER IN SUPPORT OF RESPONDENT ANDORRA VENTURES LLC'S DISPOSITIVE MOTION TO DISMISS ERRORS OF PROCEDURE, FACT AND LAW NOS. 1 THROUGH 6, 8, 9, AND 13 - PAGE 2 of 2

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