

The Honorable Robert S. Lasnik

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UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

DAVID PALLIES, an individual,

Plaintiff,

v.

THE BOEING COMPANY, a Delaware
Corporation,

Defendant.

No. 2:16-CV-01437-RSL

**DECLARATION OF HOYT BONAR
IN SUPPORT OF OPPOSITION TO
PLAINTIFF’S MOTION TO COMPEL
DISCOVERY AND THE BOEING
COMPANY’S REQUEST FOR
REASONABLE EXPENSES
INCURRED IN OPPOSING THE
MOTION**

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DECLARATION OF HOYT BONAR

I, Hoyt Bonar, declare as follows:

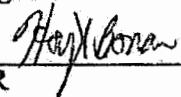
1. I am over eighteen years of age and have personal knowledge of the facts as set forth herein, and if called to testify as a witness, I could and would testify competently thereto under oath. I am employed for The Boeing Company ("Boeing") as the Superintendent of cranes, tool services and rotating tools.

2. I spoke to Boeing's outside legal counsel at the direction of Boeing's legal department. I understood that, in speaking with Boeing's counsel in preparation for my deposition, I was providing information to enable her to provide legal advice to the company. I also understood that I was represented by Boeing's attorney Jennifer Svanfeldt for purposes of my deposition in this case. I sought her legal advice and assistance regarding my deposition and wanted her to help me through the process.

3. On the day that I prepared for my deposition with Ms. Svanfeldt, it was my understanding that my communications with a current and former employee in the presence of Boeing counsel were made in confidence and at the direction of Boeing legal counsel. Communications during deposition representation concerned matters within the scope of my employment. I do not wish to waive the attorney-client privilege in regard to my communications with other employees that were in the presence of Boeing counsel.

I declare under penalty of perjury under the laws of the United States of America and the State of Washington that the foregoing is true and correct.

Executed this 9TH day of June, 2017, at Everett, Washington.



HOYT BONAR

CERTIFICATE OF SERVICE

I, Monica Brennan, am a citizen of the United States and employed in San Francisco County, California. I am over the age of eighteen years and not a party to the within entitled action. My business address is One Market, Spear Street Tower, San Francisco, California 94105. On June 12, 2017, I caused a copy of the following document to be served via CM/ECF on the following:

DECLARATION OF HOYT BONAR IN SUPPORT OF OPPOSITION TO PLAINTIFF’S MOTION TO COMPEL DISCOVERY AND THE BOEING COMPANY’S REQUEST FOR REASONABLE EXPENSES INCURRED IN OPPOSING THE MOTION

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Cody Fenton-Robertson
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cody@beanlawgroup.com

I declare under penalty of perjury under the laws of the United States of America and the state of California that the foregoing is true and correct.

Signed this 12th day of June, 2017, at San Francisco, California.



Monica Brennan