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IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON

IN AND FOR THE COUNTY OF KING

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PATRICK JONES, individually, )  
 )  
Plaintiff, )  
 )  
vs. ) No. 16-2-22028-2SEA  
 )  
BELLEVUE SCHOOL DISTRICT 405, 14A )  
public school district; WASHINGTON )  
INTERSCHOLASTIC ACTIVITIES )  
ASSOCIATION, a nonprofit corporation;) )  
KINGCO CONFERENCE, a nonprofit )  
corporation; and SEA-KING DISTRICT 2 )  
OF THE WIAA, a nonprofit corporation;) )  
YARMUTH & WILDSON, PLLC, a Washington )  
Professional Limited Liability )  
Company, BOB WESTINGHOUSE and )  
CARL BLACKSTONE, in their individual )  
capacities, )  
 )  
Defendants. )

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Deposition Upon Oral Examination of  
MICHAEL COLBRESE

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Taken at 11819 NE 34th Street  
Bellevue, Washington  
Thursday, April 13, 2017

Atkinson-Baker, Inc.  
Court Reporters  
www.depo.com

REPORTED BY: Mindy L. Suurs, CSR No. 2195

File No. AB03B6F

1 BY MS. JONES:

2 Q. So --

3 MR. CALFO: Excuse me, he's not done answering.

4 A. When we start drilling down into specific rules  
5 interpretations, there are times where in the day-to-day  
6 operations of the associations where I'm not involved, and  
7 those, as I call them, in the weeds interpretations are  
8 left to my staff. So there may be some situations where  
9 I'm not going to be able to provide you with answers  
10 because, like I said, those are the responsibilities of my  
11 administrative staff.

12 BY MS. JONES:

13 Q. Just let me know if you can't provide me with an  
14 interpretation.

15 A. I definitely will. I'm not going to mislead you.

16 Q. Okay. So let's go to why you said that the off  
17 season conditioning does not -- I'm sorry, why you said --  
18 I'll rephrase it. I asked you whether off season  
19 conditioning does not apply in the summer activities time  
20 period, and you said no, which means to me that it does.  
21 Is that what you intended your answer to be?

22 MR. CALFO: Object to the form.

23 A. Yeah, because the summer is an open period.

24 MS. JONES: Right.

25 A. It's just open. To me, out of -- again, when

1 you're talking off season, season means the school year.

2 Q. Okay. And so really, 17.7.0 is intended to be  
3 enforced during the WIAA school year; is that correct?

4 MR. CALFO: Object to the form.

5 A. Correct.

6 BY MS. JONES:

7 Q. Going back to summer activities time period,  
8 17.10.0 on Page 21, do you agree that coaches -- that  
9 17.10.1 allows coaches to conduct activities during the  
10 summer on their own as individuals?

11 MR. CALFO: Object to the form.

12 A. On their own as individuals. I guess I'd need to  
13 know more of what you're -- what you're asking me for to  
14 give you a definitive answer.

15 BY MS. JONES:

16 Q. Sure. Could you look at 17.10.1 and read it to  
17 yourself.

18 A. Yes.

19 Q. Could you tell me what does that mean, the words  
20 "as individuals"? What does that mean?

21 MR. CALFO: Object to the form.

22 A. That they can do it by themselves, independently.

23 BY MS. JONES:

24 Q. Independent of the member school?

25 MR. CALFO: Object to the form.