
Declaration of Charles R. Wolfe, University of Southern California et al.
v. Conquest Student Housing, LLC et al., (Central District of California,
Case No. CV 07-05737 ODW (AJWx)), January 9, 2008

DECLARATION OF CHARLES R. WOLFE

I, Charles R. Wolfe, declare as follows:

1. I am currently an attorney in private practice with over 23 years of experience in environmental and land use law, innovative land use regulatory tools, and sustainable development techniques. I have held significant leadership positions in both the legal and planning professions and currently represent municipalities and private parties on redevelopment, environmental and land use permitting and property remediation issues in Seattle, Tacoma, Renton, Bellevue, Kirkland, Mercer Island, Everett, Snohomish County, Anacortes, Bainbridge Island, Poulsbo, Gig Harbor, Port Orchard, Milton, Bonney Lake, Sunnyside, Richland and several other venues statewide. I was previously a partner and chair of the Environmental Practice Group at Foster Pepper PLLC in Seattle. I am an Affiliate Associate Professor in the College of Architecture and Urban Planning at the University of Washington, where I teach several classes and have contributed to a major research grant addressing brownfield redevelopment. I have been named Washington Law & Politics "Superlawyer" every year since 2002, and was recently named a "Top 40 Environmental/Land Use Law Superlawyer." I carry Martindale-Hubbell's highest "AV" rating and I am a frequent speaker and author on a variety of environmental and land use issues.

2. I have firsthand personal knowledge of the facts set forth below and, if called upon to do so, I would testify to these facts under oath.

3. During June 2007, I received a telephone call from an individual who identified himself as Greg Yaris from Los Angeles, California. Mr. Yaris asked if I was familiar with Urban Partners, LLC ("Urban"). I responded that I was. Mr. Yaris told me that an Urban project had been approved through the Los Angeles City approval process. He stated that his clients, whom he did not identify by name, owned a competing project adjacent to the University of Southern California (USC) that was harmed by the approval of the Urban project. Mr. Yaris did not describe the nature of either of the projects. Mr. Yaris explained that because of his clients' competing projects, his clients had decided to "get in the way of every Urban project that was in the regulatory process wherever that project might be."

4. Mr. Yaris stated that if I would take the case to oppose Urban's Kenmore, Seattle and potentially other Washington projects, they would find the clients. When I asked specifically how they could oppose these projects without having an aggrieved party, Mr. Yaris stated, "Don't worry, we will find one; we

always do." Mr. Yaris explained to me that his experience in the Los Angeles area was that with the exception of the projects identified as adjacent to USC, the larger, more highly visible firms were not willing to do this kind of work, but his experience was that solo practitioners like me might be.

5. Mr. Yaris did nothing to indicate that this was a privileged conversation and never asked me to keep this information confidential.

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

Executed this 9th day of January, 2008.



Charles R. Wolfe