

HONORABLE ROBERT S. LASNIK

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

KAREY MARTINEZ,

Plaintiff,

v.

SSA MARINE, INC. and TOTAL
TERMINALS INTERNATIONAL
LLC,

Defendant.

Case No. 16-CV-01626-RSL

**DEFENDANT TOTAL TERMINALS
INTERNATIONAL LLC'S INITIAL
DISCLOSURES UNDER FRCP 26**

TTI's Initial Disclosures

CASE NO. 2:16-cv-01626

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Defendant Total Terminals International LLC ("TTI") hereby makes the following initial disclosures based on information reasonably available, under Federal Rules of Civil Procedure Rule 26(a)(1).

A. Witnesses

The name and, if known, the address and telephone number of each individual likely to have discoverable information that the disclosing party may use to support its claims or defenses, unless solely for impeachment, identifying the subjects of the information.

RESPONSE:

Under FRCP 26(a)(1)(A), TTI hereby identifies the following witnesses who are presently known and are contemplated to be used in defense of the material allegations set forth in the Complaint on file in this action:

NAME	COMPANY	AREAS OF KNOWLEDGE	LAST KNOWN ADDRESS
Karey Martinez		Mr. Martinez's employment; Events at hearings EC-0010-2016 and EC-0023-2016	13036 SE Kent Kangley Rd Unit 332 Kent, WA 98030
Mike Hebblethwaite	ILWU Local 98	Events at hearings EC-0010-2016 and EC-0023-2016	ILWU Local 98 22659 Pacific Hwy South, #303 Des Moines, WA 98198-5155
Rod Edgbert	ILWU Local 98	Events at hearings EC-0010-2016 and EC-0023-2016	ILWU Local 98 22659 Pacific Hwy South, #303 Des Moines, WA 98198-5155
F. (Zeke) Green	ILWU Local 98	Events at hearings EC-0010-2016 and EC-0023-2016	ILWU Local 98 22659 Pacific Hwy South, #303 Des Moines, WA 98198-5155
Jeff Moore	ILWU Local 98	Events at hearings EC-0010-2016 and EC-0023-2016	ILWU Local 98 22659 Pacific Hwy South, #303 Des Moines, WA 98198-5155

NAME	COMPANY	AREAS OF KNOWLEDGE	LAST KNOWN ADDRESS
Scott Reid	ILWU Local 98	Events at hearings EC-0010-2016 and EC-0023-2016	ILWU Local 98 22659 Pacific Hwy South, #303 Des Moines, WA 98198-5155
Tom Clay	TTI	Mr. Martinez's employment	Total Terminals International 401 Alaskan Way S. Seattle, WA 98104
R. Jefferson	ILWU	Events at the Labor Relations Committee meeting of August 17, 2016	3440 E Marginal Way S, Seattle, WA 98134
Marvin Ferreira	APM Terminals	Events at the Labor Relations Committee meeting of August 17, 2016	1675 Lincoln Avenue, Tacoma, WA 98421
Graham Hunter	SSA Marine, Inc.	Events at the Labor Relations Committee meeting of August 17, 2016	3225 East Marginal Way South, Seattle, WA 98134
Theodore Musselman	Jones Stevedoring Company	Events at the Labor Relations Committee meeting of August 17, 2016	7245 W Marginal Way SW, Seattle, WA 98106
Blair Smith	Ports America	Events at the Labor Relations Committee meeting of August 17, 2016	710 Port of Tacoma Road, Tacoma, WA 98421
Joseph Weber	West Coast Terminal Stevedore Inc.	Events at the Labor Relations Committee meeting of August 17, 2016	1101 Port of Tacoma Road Terminal Four Tacoma, WA 98421
Jeremy Roberts	Pacific Maritime Association	Events at the Labor Relations Committee meeting of August 17, 2016	P.O. Box 9348 Seattle, WA 98109-0348
Bob Roedel	Pacific Maritime Association	Events at the Labor Relations Committee meeting of August 17, 2016	P.O. Box 9348 Seattle, WA 98109-0348
Doug Stearns	Pacific Maritime Association	Events at the Labor Relations Committee meeting of August 17, 2016	P.O. Box 9348 Seattle, WA 98109-0348

1 The identification of a name as part of these initial disclosures is not, and
2 should not be interpreted as, a statement by TTI that the named individual will
3 appear as a witness at trial or any other proceeding. The inclusion of a name is not,
4 and should not be interpreted as, a waiver of any attorney-client or other privilege
5 that may apply. The absence of a name from the list provided by TTI is not, and
6 should not be interpreted as, a statement by TTI that an individual does not have
7 relevant knowledge and will not appear as a witness at trial.

8 TTI anticipates that there may be other witnesses and third parties whose
9 identities and/or scope of knowledge are not currently known to TTI and who may
10 have information relevant to the claims against TTI. As discovery and TTI's
11 investigation progress, TTI will supplement this disclosure to the extent required by
12 the Federal Rules of Civil Procedure. TTI reserves the right to supplement this list
13 and call additional witnesses at trial as additional information becomes known. TTI
14 reserves the right to call any and all witnesses identified by any other party in this
15 action.

16 **B. Documents**

17 *A copy of, or a description by category and location of, all documents,*
18 *electronically stored information, and tangible things that the disclosing party has*
19 *in its possession, custody, or control and may use to support its claims or defenses,*
20 *unless the use would be solely for impeachment.*

21 **RESPONSE:**

22 Under FRCP 26(a)(1)(B), TTI hereby identifies the following documents,
23 data compilations and tangible things which are presently known to them and are
24 contemplated to be used in defense of the material allegations set forth in the
25 Complaint on file in this case. Each of the documents listed below is in the
26 possession of TTI. These items are disclosed by description only pursuant to Rule
27 26(a)(1)(B):
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