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1	□ EXPEDITE	
2	☐ No hearing is set  √ Hearing is set	
3	Date: January 13, 2011 Time: 11 a.m.	
4	Judge/Calendar: Hon. Paula Casey/ Hon. Christopher Wickham	
5	Hon. Christopher Wickham	
6		
7		
8	SUPERIOR COURT OF WASHINGTON FOR THURSTON COUNTY	
9	KENT L. and LINDA DAVIS; JEFFREY and SUSAN TRININ; and SUSAN No. 11-2-01925-7	
10	MAYER, derivatively on behalf of OLYMPIA FOOD COOPERATIVE,  DECLARATION OF SUSAN	
11	TRININ OPPOSING DEFENDANTS'	
12	Plaintiffs, SPECIAL MOTION	
13	V.	ŀ
14	GRACE COX; ROCHELLE GAUSE; ERIN GENIA; T.J. JOHNSON; JAYNE	
15	KASZYNSKI; JACKIE KRZYŻEK; JESSICA LAING; RON LAVIGNE;	
16	HARRY LEVINE; ERIC MAPES; JOHN NASON; JOHN REGAN; ROB	
	RICHARDS; SUZANNE SHAFER; JULIA	
17	SOKOLOFF; and JOELLEN REINECK WILHELM,	
18	Defendants.	
19		
20	I, Susan Trinin, declare under penalty of perjury of the laws of the State of	
21	Washington that the following statements are true and correct and based on personal	
22	knowledge:	
23	1. I am over the age of 18, have knowledge of the facts set forth below, and am	
24	competent to testify thereto. I am one of the Plaintiffs in the above-captioned litigation.	
25	2. My husband, Jeffrey Trinin, and I have lived in Olympia, Washington since 1981. I	
26	joined the Olympia Food Cooperative (the "Co-op") as a member in 1981, and have	

remained a member of the Co-op since that time. I continue to volunteer at the Co-op regularly, as I have for many years.

- 3. From 1990 to 1994, I was a member of the Board of Directors of the Co-op. I am familiar with the enactment in May 1993 of the Co-op's Boycott Policy. Underlying the adoption of the Boycott Policy were several intentions, among them that (1) the Co-op would be a follower with regard to boycotts that were already recognized—not a leader; (2) the prior recognition of such boycotts would be national in scope; and (3) authority to recognize boycotts would reside with the Co-op Staff—not the Board,
- 4. I am familiar with the enactment in July 2010 by the Board of a resolution to boycott and divest from Israel, which I believe was improper and unlawful.
- 5. Although it was given no advance notice of the Board's plans to vote on the proposal to boycott and divest from Israel, the Co-op community quickly caught wind of the Board's improper action. Prompt requests were made by certain Co-op members to rescind the resolution/policies, and the Board faced widespread criticism for its action.
- 6. It soon became clear to me, however, that the Board had no intention of rescinding the resolution/policies. In an effort to avoid litigation and resolve our differences with the Defendants informally, I and the other Plaintiffs sent a letter, dated May 31, 2011, to each of the Defendants setting forth our position. A true and correct copy of that letter is attached to the Declaration of Avi J. Lipman as Exhibit AA.
- 7. I am familiar with this litigation and have been and remain willing to learn more about it. Indeed, I and the other Plaintiffs have been closely involved at every stage of our ongoing dispute with the Defendants.
- 8. I and the other Plaintiffs have not surrendered our control of the litigation to our attorneys.
  - 9. I maintain a personal commitment to the action on the part of the Co-op.

- 10. Through this lawsuit, I and the other Plaintiffs seek a remedy on behalf of the Coop, not ourselves personally.
- 11. I maintain an interest in this action that outweighs any personal interest I might have in the outcome. In fact, I have no personal interest in the outcome of this litigation insofar as I stand to gain nothing financially if we prevail.
- 12. At some point after the summer of 2010, I and the other Plaintiffs sought out the assistance of a pro-Israel charitable organization (StandWithUs) in an effort to contest the Board's unlawful actions. Unlike the Board members, we did not have an organization like Boycott, Divestment and Sanctions ("BDS")—an international alliance of anti-Israel political organizations—to help us. Our communication with StandWithUs resulted from frustration and exhaustion at being ignored, derided, and ultimately brushed aside by the Defendants. I and the other Plaintiffs, however, are not "pawns" of StandWithUs or any other organization. Although I am not a lawyer, I believe we are the "real parties in interest" on behalf of the Co-op. I have not communicated with anyone from StandWithUs since 3/28/11.
- 13. After the Board's improper and unlawful enactment of the Israel Boycott and Divestment resolution/policies, a number of Co-op members either cancelled their memberships or otherwise stopped shopping at the Co-op in protest.
- 14. "Voter turnout" for the Co-op's Board elections in November 2010 was greater for the five candidates endorsed by BDS because BDS activists at the Evergreen State College campus had recruited and then carpooled students to the Co-op to become members for the express purpose of endorsing the Israel Boycott and Divestment resolution/policies.
- 15. I and the other Plaintiffs have received significant support from other Co-op members since we filed suit against the Defendants, and I believe we "fairly and

adequately" represent those members who oppose the Board's improper and unlawful enactment of the Israel Boycott and Divestment resolution/policies.

Dated this 30th day of November, 2011.

Susan Tylnin

DECLARATION OF SUSAN TRININ - Page 4

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