

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26

SUPERIOR COURT OF THE STATE OF WASHINGTON  
FOR WHATCOM COUNTY

CITY OF BELLINGHAM, a municipal corporation,

Plaintiff,

v.

LI-CHING FANG,

Defendant.

52ND & BROOKLYN, LLC, a limited liability company,

Intervenor.

Case No.: 24-2-00355-37

**JUDGE LEE GROCHMAL, DEPT. 3**

**DECLARATION OF ADAM DOUPÉ IN SUPPORT OF INTERVENOR’S MOTION FOR SUMMARY JUDGMENT**

**NOTED FOR SEPTEMBER 7, 2024, AT 8:30 A.M.**

I, Adam Doupé, declare:

1. I am over the age of eighteen, not a party to the above-captioned matter, and am competent to testify to matters herein.

2. I am an attorney with the law firm of Buchalter, P.C., counsel of record for Intervenor, 52<sup>nd</sup> & Brooklyn, LLC.

3. Attached hereto as Exhibit “A” and incorporated by reference herein is a true and correct copy of video footage taken during the day of an encampment of unhoused persons

1 to the east of Intervenor’s real property. The video footage was taken in January 2024 using a  
2 drone flown by a licensed commercial drone videographer company, DPdrones.

3 4. Attached hereto as Exhibit “B” and incorporated by reference herein is a true  
4 and correct copy of drone video footage taken of the same real property in January 2024. In this  
5 second video clip, the drone’s camera utilizes heat seeking technology to detect people and  
6 objects emitting heat.

7 5. The local news media has widely reported regarding an encampment of  
8 unhoused persons located on real property immediately adjacent to Intervenor’s property. On  
9 August 2, 2024, I accessed a news article from the Bellingham Herald’s website reporting on  
10 this issue. A link to the article is embedded herein:  
11 <https://www.bellinghamherald.com/news/local/article280602139.html>.

12 6. On May 23, 2024, I submitted a separate declaration in support of Intervenor’s  
13 Motion to Intervene. Attached to my previous declaration, and incorporated by reference herein,  
14 is a true and correct copy of a letter that I sent to Defendant Li-Ching Fang and other owners  
15 of adjacent properties. The letter was attached as Exhibit “D.”

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

18 Dated this 2nd day of August, 2024 at Seattle, Washington.

19 

20 Adam C. Doupe

1 **CERTIFICATE OF SERVICE**

2 I hereby certify that on the 2nd day of August, 2024, I caused to be served a copy of  
3 the foregoing on the following person via electronic mail in the manner indicated below at the  
4 following address:

5 **Attorney for City of Bellingham**

**U.S. Mail**

6 Michael E. Good, WSBA #44857  
7 City of Bellingham  
8 210 Lottie Street  
9 Bellingham, WA 98225  
T: 360.778.8270  
E: megood@cob.org

10 **Defendant Li-Ching Fang**

**Federal Express / U.S. Mail**

11 Li-Ching Fang  
12 No. 921, Kung-I Rd.  
13 Chunan Township  
14 Miaoli County 350028  
15 Taiwan (R.O.C.)

16 /s/ Kristina Reger

17 Kristina Reger, Legal Assistant