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HONORABLE BRIAN MCDONALD  
Department 48  
Noticed for Presentation: June 11, 2020

IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON  
IN AND FOR THE COUNTY OF KING

WASHINGTON LEAGUE FOR  
INCREASED TRANSPARENCY AND  
ETHICS, a Washington non-profit  
corporation; JOHN DOE and JANE DOE 1-  
1,000,

Plaintiffs,

v.

FOX CORPORATION, a Delaware  
corporation; FOX NEWS NETWORK, LLC,  
a Delaware corporation d/b/a FOX NEWS  
CHANNEL; FOX BUSINESS NETWORK,  
a for profit company d/b/a FOX BUSINESS;  
JOHN MOE and JANE MOE, 1-100

Defendants.

NO. 20-2-07428-4 SEA

**NOTICE OF PRESENTATION OF  
JUDGMENT**

TO: CLERK OF THE COURT  
AND TO: ALL PARTIES OF RECORD  
AND TO: ALL ATTORNEYS OF RECORD

Please take notice that the Judgment attached as Exhibit A is noticed for presentation and  
entry by the Court on June 11, 2020.

1 DATED this 4th day of June, 2020.

2 HARRIGAN LEYH FARMER & THOMSEN LLP

3  
4 By s/Tyler L. Farmer

5 Tyler L. Farmer, WSBA #39912  
6 Kristin E. Ballinger, WSBA #28253  
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12 Email: kristinb@harriganleyh.com

13 JONES DAY

14 Christopher Lovrien (*pro hac vice*)  
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Email: ajdick@jonesday.com

*Attorneys for the Fox Defendants*

# EXHIBIT A

IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON  
IN AND FOR THE COUNTY OF KING

WASHINGTON LEAGUE FOR INCREASED  
TRANSPARENCY AND ETHICS, a  
Washington non-profit corporation; JOHN  
DOE and JANE DOE 1-1,000,

Plaintiffs,

v.

FOX CORPORATION, a Delaware  
corporation; FOX NEWS NETWORK, LLC, a  
Delaware corporation d/b/a FOX NEWS  
CHANNEL; FOX BUSINESS NETWORK, a  
for profit company d/b/a FOX BUSINESS;  
JOHN MOE and JANE MOE, 1-100

Defendants.

NO. 20-2-07428-4 SEA

**[PROPOSED] JUDGMENT**

**SUMMARY OF JUDGMENT**

Judgment Creditor

Fox Corporation, Fox News Network, LLC, Fox  
News Channel, Fox Business Network, Fox  
Business

Attorneys for Judgment Creditor

Tyler L. Farmer, Kristin E. Ballinger  
Harrigan Leyh Farmer & Thomsen LLP  
  
Christopher Lovrien, Emily Faye Knox, Michael A.  
Carvin, Anthony J. Dick  
Jones Day

Judgment Debtor

Washington League For Transparency and Ethics

Amount of Judgment

\$334.94

Amount of Prejudgment Interest Owed to Date

\$0

Post-Judgment Interest Rate

12% per annum

1 **JUDGMENT**

2 Consistent with the Court’s May 27, 2020 order granting the Fox Defendants’ motion to  
3 dismiss, the Court enters final judgment as follows: The Fox Defendants are awarded judgment  
4 against the plaintiffs on all claims. As the prevailing party, the Fox Defendants are entitled to  
5 statutory costs as provided in RCW 4.84.010, .030, .060, and .080 and accordingly are awarded  
6 judgment against plaintiff Washington League for Increased Transparency and Ethics (WASHLITE)  
7 in the amount of \$334.94 as set forth in the cost bill submitted by the Fox Defendants. The judgment  
8 amount shall accrue post-judgment interest at the rate of 12 percent per annum, pursuant to RCW  
9 4.56.110 and RCW 19.52.020.

10 DATED this \_\_\_\_ day of \_\_\_\_\_, 2020.

11 \_\_\_\_\_  
12 HONORABLE BRIAN MCDONALD

13 Presented by:

14 HARRIGAN LEYH FARMER & THOMSEN LLP

15 By s/Tyler L. Farmer

16 Tyler L. Farmer, WSBA #39912  
17 Kristin E. Ballinger, WSBA #28253  
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12 Email: macarvin@jonesday.com  
13 Email: ajdick@jonesday.com

14 *Attorneys for the Fox Defendants*

1 **CERTIFICATE OF SERVICE**

2 I, Erin Fujita, declare that I am employed by the law firm of Harrigan Leyh Farmer &  
3 Thomsen LLP, a citizen of the United States of America, a resident of the state of Washington,  
4 over the age of eighteen (18) years, not a party to the above-entitled action, and competent to be a  
5 witness herein.

6 On June 4, 2020, I caused a true and correct copy of the foregoing document to be served  
7 on the persons listed below in the manner indicated:

<p>8 Catherine C. Clark, WSBA #21231 9 Law Office of Catherine Clark PLLC 10 2200 6<sup>th</sup> Ave., Suite 1250 11 Seattle, WA 98121 12 Phone: (206) 838- 2528 13 Fax: (206) 374- 3003 14 Email: Cat@loccc.com</p> <p>15 <i>Attorney for Washington League For Increased 16 Transparency And Ethics</i></p>	<p><input type="checkbox"/> Via Hand Delivery <input type="checkbox"/> Via First Class Mail <input type="checkbox"/> Via Facsimile <input type="checkbox"/> Via Electronic Mail <input checked="" type="checkbox"/> Via King County Clerk E-Service</p>
---	---

17 DATED this 4th day of June, 2020.

18 *s/ Erin Fujita*  
19 \_\_\_\_\_  
20 Erin Fujita, Legal Assistant  
21 erinf@harriganleyh.com

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a Delaware corporation d/b/a FOX NEWS  
CHANNEL; FOX BUSINESS NETWORK,  
a for profit company d/b/a FOX BUSINESS;  
JOHN MOE and JANE MOE, 1-100

Defendants.

NO. 20-2-07428-4 SEA

**FOX DEFENDANTS' COST BILL AND  
DECLARATION OF COUNSEL**

19 Pursuant to RCW 4.84.010, .030, .060, and .080, the Fox Defendants as prevailing parties  
20 submit the cost bill detailed below and request the Court enter judgment against plaintiff Washington  
21 League for Increased Transparency and Ethics (WASHLITE).

22 In the Fox Defendants' motion to dismiss, we explained at length that the plaintiffs' factual  
23 allegations in this case were deceptive and distorted, and their legal arguments astounding and  
24 frivolous. As legal professionals, we did not use these terms lightly. For example, the plaintiffs  
25 attributed to Sean Hannity statements that he never made, on a night when he was not on air, and



1 that were actually made by someone else who is not affiliated with Fox, at a political event that Fox  
 2 did not even televise. Plaintiffs also attributed various other statements to Fox News hosts and guests  
 3 based on brazen deceptions about what they actually said. *See* MTD 10-12. As for their legal  
 4 arguments, plaintiffs relied on the facially absurd notion that Fox News can be censored at will  
 5 because “cable programmers do not have First Amendment rights on the cable medium.”  
 6 WASHLITE Opp’n at 11, 18. In fact, as this Court noted in its order, the Supreme Court has squarely  
 7 held that the First Amendment fully protects cable programmers, and the very cases cited by  
 8 plaintiffs confirm this point. *See* Order Granting MTD at 4.

9           Nevertheless, Fox does not believe that this lawsuit, however ill-advised and misguided, was  
 10 malicious. Rather, it appears that plaintiffs and their counsel were caught up in the partisan anti-Fox  
 11 fervor fomented by some pundits and agitators. Fox therefore will not move for sanctions. In the true  
 12 spirit of the First Amendment, Fox will combat plaintiffs’ false accusations with its own true speech,  
 13 and will continue to advance its mission of accurate reporting and clear opinions on the Coronavirus  
 14 pandemic and other issues of public importance. Accordingly, Fox seeks only the following statutory  
 15 attorney fees and costs.

Date	Description	Amount
	Statutory Attorney Fee <sup>1</sup>	\$200.00
4/6/20	Filing Fee, <sup>2</sup> Acceptance of Service	\$22.49
4/8/20	Filing Fee, Notice of Appearance	\$22.49
4/8/20	Filing Fee, Motion for Limited Admission	\$22.49
4/14/20	Filing Fee, Motion to Dismiss	\$22.49
4/23/20	Filing Fee, Motion to Dismiss First Amended Complaint	\$22.49
5/18/20	Filing Fee, Reply Motion to Dismiss First Amended Complaint	\$22.49

1 <sup>1</sup> *See* RCW 4.84.010, .080.

2 <sup>2</sup> The filing fees were incurred as set forth at LCR (b)(7)(4) and KCC 4A.630.190.

1 DATED this 4th day of June, 2020.

2 HARRIGAN LEYH FARMER & THOMSEN LLP

3 By s/Tyler L. Farmer

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Email: ajdick@jonesday.com

*Attorneys for the Fox Defendants*

1 **DECLARATION OF COUNSEL**

2 I, Kristin E. Ballinger, hereby declare

3 1. I am one of the attorneys of record for the Fox Defendants in the above-captioned  
4 matter and am competent to testify to the matters herein.

5 2. The Fox Defendants prevailed on their motion to dismiss. The foregoing cost bill  
6 reflects the Fox Defendants' statutory attorney fee and costs pursuant to RCW 4.84.010, .030, .060,  
7 and .080.

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

10 DATED this 4th day of June, 2020.

11 */s Kristin E. Ballinger* \_\_\_\_\_  
12 KRISTIN E. BALLINGER

1 **CERTIFICATE OF SERVICE**

2 I, Erin Fujita, declare that I am employed by the law firm of Harrigan Leyh Farmer &  
3 Thomsen LLP, a citizen of the United States of America, a resident of the state of Washington,  
4 over the age of eighteen (18) years, not a party to the above-entitled action, and competent to be a  
5 witness herein.

6 On June 4, 2020, I caused a true and correct copy of the foregoing document to be served  
7 on the persons listed below in the manner indicated:

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---	---

14 DATED this 4th day of June, 2020.

15 *s/ Erin Fujita*  
16 \_\_\_\_\_  
17 Erin Fujita, Legal Assistant  
18 erinf@harriganleyh.com