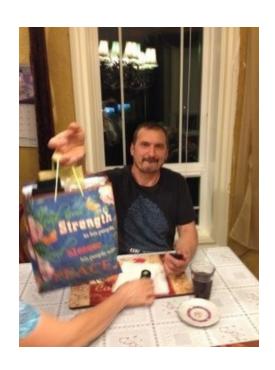
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7	IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON IN AND FOR THE COUNTY OF CLARK				
8	IN AND FOR THE	COUNTY OF CLARK			
9	STATE OF WASHINGTON,) No. 18-1-01096-9			
10	Plaintiff,)			
11	vs.	DECLARATION OF LYUBOV KEE			
12	VLADIMIR V. NIKOLENKO,))			
13 14	Appellant.)			
15	I. DECLARATION				
16	1. I, Lyubov Kee, state and declare that I am over the age of 18 and make the following				
17	statements upon information and belief.				
18					
19	2. I also go by the name Luba Kee. Vladimir Nikolenko is my brother.				
20	3. On November 11, 2016, Vladimir was present at our sister's, Olga Fisenko's, home for				
21	Vladimir's birthday party. I was present for this birthday party as well, as I arrived from				
22	Denver, Colorado on that date. Vladimir was at Olga's home the night before, on				
23	November 10, 2016 and stayed there until November 14, 2016. Vladimir drove me to the				
24	airport on November 14, 2016. Attached	as "Appendix A" is a true and accurate depiction			
25	of photos that were taken on November 11, 2016 for Vladimir's birthday party.				
26					
27					
28	DECLARATION OF LYUBOV KEE	- 1 - GRECCO DOWNS, PLLC ATTORNEYS AT LAW			

ATTORNEYS AT LAW 701 COLUMBIA ST. #109 VANCOUVER, WASHINGTON 98660 P: 1-855-309-4529 F: 1-855-309-4530

1	4.	The weekend before Vladimir's trial began, Olga was investigating when Vladimir came
2		to Portland on a bus from Seattle. She was able to get a copy of the bus ticket from
3		Vladimir's daughter, Ludmila Nikolenko. The ticket showed that Vladimir's bus departed
4		from Seattle on November 29, 2016 at 12:30pm and was scheduled to arrive in Portland at
5		3:45pm that day. Olga also was able to get in touch with Frontier Airlines and found out
7		that her flight with Vladimir departed on November 30, 2016 at 10:20am.
8	5.	The morning of the first day of trial, before the hearing began, I attempted to give Mr.
9		Vukanovich the information about Vladimir's bus ride, the flight information, and a copy
10		of Olga's credit card showing the flight that was purchased. See "Appendix B" (bus
11		information). He would not take that information. I was with Vladimir and Olga's
12		husband, Pavel, at the time. I asked Mr. Vukanovich to clarify in the trial that Vladimir
13		
14		was present at Olga's home on two separate occasions, but he indicated that he did not
15		want to argue this.
16	6.	Later during the trial, myself, Vladimir, and Olga discussed how Vladimir wanted to
17		testify at trial. Vladimir also indicated that he wanted to testify. Mr. Vukanovich said
18		okay.
19		
20	I d	eclare under penalty of perjury pursuant to the laws of the state of Washington that the
21 22	for	regoing is true and correct.
23		
24		Signed this
25		Signed this 03 / 24 / 2023 in Hawaii County.
26		V_{000}
27		Lyubov Kee
28		FCLARATION OF LYLIBOV KEE - 2 - GRECCO DOWNS, PLLC

APPENDIX A







APPENDIX B

Description

\$16.00 Seattle, WA (5th Avenue South @ S. King St) to Portland, OR (NW Everett @ NW 8th Ave)

Departing 11/29/2016 at 12:30 PM **Confirmation #:** A05-9845334-16

\$2.00 \$18.00

Transaction Fee **Grand Total**

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Have a safe trip!

Seattle, WA (5th Avenue South @ S. King St) to Portland, OR (NW Everett @ NW 8th Ave)						
	Vla	Vladimir Nikolenko				
	Departing 11/29/20	016 12:30 PM	Boarding Group			
	Arriving 03:45 PM	Confirmation # A05-9845334-16	Schedule # 9845			
	Boarding P	ass i				

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Title Luba Kee - declaration (updated)

File name Nikolenko, declar...e (corrected).pdf

Document ID cf9e60419dcb3a9412a630072ce53a3367423e95

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