

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

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

UNITED FEDERATION OF CHURCHES,  
LLC (dba "THE SATANIC TEMPLE")

Plaintiff/Counterclaim  
Defendant,

v.

DAVID ALAN JOHNSON (AKA "ADJ"),  
LEAH FISHBAUGH, MICKEY MEEHAN,  
and NATHAN SULLIVAN,

Defendants/  
Counterclaimants

No. 23-2-06120-9 SEA

**REPLY DECLARATION OF  
NATHAN SULLIVAN IN  
SUPPORT OF DEFENDANTS'  
MOTION FOR SUMMARY  
JUDGMENT**

I, Nathan Sullivan, declare as follows:

1. I am one of the defendants in the above captioned lawsuit. I make this declaration based on my own personal knowledge. I am over the age of eighteen and am otherwise competent to testify. If called upon to testify on the matters herein, I would do so consistently with this declaration.

2. In 2014, I was the co-founder of an autonomous local chapter of The Satanic Temple called The Satanic Temple – Seattle. The chapter changed its name to The Satanic Temple-Washington (or TST-Washington) in January of 2020, so for purposes of this Declaration I will refer to the chapter as the "Washington Chapter."

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


3. During my membership with the Washington Chapter, I served as a volunteer in various capacities for the Washington Chapter. At all times during my membership with the Washington Chapter and during my volunteer work, I understood that I was a member of the autonomous local Washington Chapter and that my volunteer work was all for the autonomous local Washington Chapter.

4. During my membership with the Washington Chapter, I was generally aware that there was some type of national group or organization called The Satanic Temple. However, it was always my understanding that my membership and volunteer work was only with the local Washington Chapter, which was its own entity that was responsible for itself.

5. At times I use the acronym "TST" as shorthand to refer to the Washington Chapter, instead of using the full name for the Washington Chapter, which was TST-Washington (and before that was TST-Seattle).

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

Executed in Seattle, Washington on this <sup>16</sup>Nathan day of September, 2024.

  
Nathan Sullivan (Sep 16, 2024 11:27 PDT)  
Nathan Sullivan

1 **CERTIFICATE OF SERVICE**

2 I hereby certify that on this date I caused true and correct copies of the foregoing  
3 document to be served upon the following, at the addresses stated below, via the method of  
4 service indicated.

5 **LYBECK PEDREIRA & JUSTUS, PLLC**

6 Benjamin Justus  
7 Fifth Floor  
8 7900 SE 28th St., Suite 500  
9 Mercer Island, WA 98040  
ben@lpjustus.com

- E-mail
- U.S. Mail
- E-filing

10 **KEZHAYA LAW PLC**

11 Matthew A. Kezhaya (*pro hac vice*)  
12 150 S. Fifth Street, Suite 1850  
13 Minneapolis, MN 55402  
matt@kezhaya.law

- E-mail
- U.S. Mail
- E-filing

14 *Attorneys for Plaintiff*

15  
16 Dated this 16th day of September, 2024 in Seattle, Washington.

17  
18 /s/ Kaila Greenberg  
19 Kaila Greenberg  
Legal Assistant