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SUPERIOR COURT OF WASHINGTON FOR SKAGIT COUNTY

HAYTON ORGANICS, INC., a Washington Corporation; ANGELICA HAYTON, an individual,

Plaintiffs,

v.

HAYTON FARMS, INC., a Washington Corporation; SUSAN HUGHES-HAYTON, an individual; GENEVIEVE HAYTON, an individual,

Defendants.

NO. 21-2-00476-29

DECLARATION OF ROBERT HAYTON IN SUPPORT OF TEMPORARY RESTRAINING ORDER AND ORDER TO SHOW CAUSE

I, Robert Hayton, declare as follows:

1. I am over the age of 18, competent to testify, and state the following based upon my personal knowledge.

2. I own Hayton Farms, which is a separate entity from—but has an ongoing business relationship with—Hayton Organics, which my daughter Angelica owns. I have reviewed Angelica’s declaration in this matter and it is accurate.

3. As the owner of Hayton Farms, I do not wish to see Hayton Organics’ crops or her other property removed from storage. We have an ongoing contract with Hayton Organics, which it has honored and paid upon all year. Precipitously removing the crops and property

DECLARATION OF ROBERT HAYTON IN SUPPORT OF TEMPORARY RESTRAINING ORDER AND ORDER TO SHOW CAUSE - 1

Williams, Kastner & Gibbs PLLC
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Seattle, WA 98101-2380
(206) 628-6600

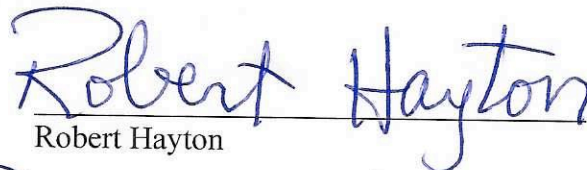
1 would violate it. It would also be fundamentally unfair to Angelica and irreparably damage her
2 reputation and business.

3 4. Unfortunately, my other daughter, Genevieve, recently threatened to do exactly
4 this—and I believe she will follow through if not restrained by the Court.

5 5. Allowing Hayton Organics to continue to store crops and property for two more
6 months—while paying pursuant to the agreement between the farms—will pose no burden to
7 Hayton Farms, nor to Genevieve or Susan. Removal of the property would, in contrast, only be
8 for spite.

9
10 I declare under penalty of perjury in accordance with the laws of the State of
11 Washington that the foregoing is true and correct.

12 Dated in Mount Vernon, Washington this 20th day of August, 2021.

13
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15 
16 Robert Hayton

17 Pres. Hayton Farms, Inc.
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DECLARATION OF ROBERT HAYTON IN SUPPORT OF
TEMPORARY RESTRAINING ORDER AND ORDER TO SHOW
CAUSE - 2

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CERTIFICATE OF SERVICE

I hereby certify that I caused to be served upon counsel of record at the address and in the manner described below a copy of the document to which this certificate is attached for delivery to the following:

<i>Defendants:</i> Hayton Farms, Inc. Susan Bailey Hughes-Hayton Genevieve Bailey Hayton	<input type="checkbox"/> Via ECF/Filing <input type="checkbox"/> Via Legal Messenger <input type="checkbox"/> Via Facsimile <input checked="" type="checkbox"/> Via Electronic Mail <input type="checkbox"/> Via U.S. Mail <input type="checkbox"/> Via Overnight Courier
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DATED this 23rd day of August, 2021.

s/Janis Hager

Janis Hager
Legal Assistant to Adam Rosenberg