

HONORABLE ROBERT S. LASNIK

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UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

CHAMBER OF COMMERCE OF THE  
UNITED STATES OF AMERICA,

*Plaintiff,*

v.

CITY OF SEATTLE, *et al.*,

*Defendants.*

Case No. C16-322RSL

DECLARATION OF AMANDA  
ENGSTROM EVERSOLE IN  
SUPPORT OF PLAINTIFF'S  
OPPOSITION TO MOTION TO  
DISMISS

I, Amanda Engstrom Eversole, hereby declare as follows:

1. I submit this declaration in support of Plaintiff's Opposition to Defendants' Motion to Dismiss. I have personal knowledge of each fact stated in this declaration, to which I could and would competently testify if called as a witness in this matter.

2. I am the President of the Center for Advanced Technology and Innovation at the Chamber of Commerce of the United States of America ("Chamber"), where I also am a Senior Vice President of the Chamber and a member of the Chamber's Management Committee. I have been at the Chamber since 2003, serving in a variety of capacities, including as Chief of Staff. In my position as President of the Chamber's Center for Advanced Technology and Innovation, in

1 which I have served since 2015, I lead the Chamber's efforts on technology policy,  
2 entrepreneurship, innovation, and development.

3 3. The Chamber is a non-profit organization, founded in 1912, created and existing  
4 under the laws of the District of Columbia, headquartered at 1615 H Street, N.W., Washington,  
5 D.C. The Chamber is the world's largest federation of businesses and associations, directly  
6 representing 300,000 members and indirectly representing the interests of more than three  
7 million U.S. businesses and professional organizations of every size, in every industry sector,  
8 and from every geographic region of the country. An important function of the Chamber is to  
9 represent the interests of its members and the overall business community in order to promote  
10 and strengthen American free enterprise.

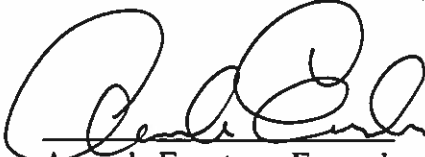
11 4. In pursuit of this goal, the Chamber routinely advocates on matters of federal  
12 antitrust and labor relations policy and represents the interests of the business community on  
13 antitrust, labor relations, and other federal preemption matters in the courts. Among other things,  
14 the Chamber routinely takes action in the courts to defend the legal rights of its members and the  
15 business community more broadly on matters concerning federal preemption of state law. Past  
16 cases brought by the Chamber on behalf of its members include *Chamber of Commerce v.*  
17 *Whiting*, 563 U.S. 582 (2011), and *Chamber of Commerce v. Brown*, 554 U.S. 60 (2008), among  
18 many other cases.

19 5. I am generally familiar with the Complaint that the Chamber has filed in this suit,  
20 and with the challenged Seattle Ordinance. The Chamber has members subject to or affected by  
21 the Seattle Ordinance, including Eastside For Hire, Inc., Quality Transportation Logistics LLC  
22 (doing business as "Q for Hire"), and Uber Technologies, Inc., and its subsidiaries Uber USA,  
23 LLC and Rasier, LLC.

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EVERSOLE DECLARATION- 2

1 I declare under penalty of perjury under the laws of the United States of America that the  
2 foregoing is true and correct.

3 Executed on May 9, 2016

  
Amanda Engstrom Eversole

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**CERTIFICATE OF SERVICE**

I hereby certify that on May 9, 2016, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the parties who have appeared in this case

DATED: May 9, 2016 at Seattle, Washington.

STOEL RIVES LLP

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