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2 Per CR5(e) & Judge Plese this document
3 Has been filed with Clerk on:
4 **JAN 27 2025**
5

6 **IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON**
7 **COUNTY OF SPOKANE**

8 **SAMANTHA LARSEN, AMELIA LYLE,**
9 **and VIRGINIA EDMONDS,** all individually
and on behalf of all similarly situated,

10 Plaintiffs,

11 vs.

12 **DOG SCIENCES, LLC dba UNLEASHED**
13 **ACADEMY; MARY DAVIES dba**
DOGOLOGY NW,

14 Defendants,

15 **DOG SCIENCES, LLC,**

16 Third Party Plaintiff,

17 vs.

18 **JENNIFER ROSSEY,**

19 Third Party Defendant.

Case No.: 23-2-03546-32 (Plese 98)

**AGREED ORDER AUTHORIZING CLASS
ACTION NOTICE**

20 The parties jointly submitted a proposed Class Action Notice, consistent with this Court's 9.20.24
21 *Order Granting Plaintiffs' Motion for Class Certification*. The Court, having reviewed same, and
22 finding it compliant with CR 23(c)(2), the Court hereby **ORDERS**:

- 23 1. The proposed Class Action Notice is **ACCEPTED** in the form attached.
24
25

**AGREED ORDER AUTHORIZING
CLASS ACTION NOTICE - 1**

ANIMAL LAW OFFICES, PLLC
114 W. Magnolia St., Ste. 400-104 • Bellingham, WA 98225
(888) 430-0001 • Facsimile: (833) 878-6835
adam@animal-lawyer.com

1 2. Plaintiffs' counsel shall serve class members with the best notice practicable under the
2 circumstances, including individual notice to all members who can be identified through
3 reasonable effort.

4 Dated this 1/27/2025


5 
Spokane County Superior Court Judge Annette S. Plese

6 Agreed:


7 ANIMAL LAW OFFICES, PLLC

8 
9 Adam P. Karp, WSB 28622
Attorney for Plaintiffs

10 CASEY LAW OFFICES, P.S.

11 
12 Brandon R. Casey, WSB 35050
13 J. Gregory Casey, WSB 02130
Attorneys for Defendants

14 WALDO SCHWEDA & MONTGOMERY PS

15 
16 John Montgomery, WSB 7485
Attorney for Third-Party Defendant

for John Montgomery by electronic
authorization 1.23.25

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**AGREED ORDER AUTHORIZING
CLASS ACTION NOTICE - 2**

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CLASS ACTION NOTICE

SPOKANE COUNTY SUPERIOR COURT

Case No. 23-2-03546-32

Larsen, et al. v. Dog Sciences, LLC d/b/a Unleashed Academy & Mary Davies d/b/a Dogology NW

A court authorized this notice. This is not a solicitation. This is not a lawsuit against you and you are not being sued. However, your legal rights are affected by whether you act or don't act.

If you are or were a person who entered into a contract or parted with any money to purchase a service dog or service puppy from Mary Davies d/b/a Dogology NW or Dog Sciences, LLC d/b/a Unleashed Academy between September 20, 2018 to the final disposition of this action, please read this notice.

A class action may affect your legal rights.

The lawsuit alleges that Defendants Dog Sciences, LLC d/b/a Unleashed Academy and Mary Davies d/b/a Dogology NW engaged in false advertising, used unconscionable contracts (e.g., limiting time to initiate a lawsuit, barring right to trial by jury, waiving implied warranties, forcing litigation in Spokane County, limiting damages to amount paid), and delivered illusory and misleading certifications of service animal performance (e.g., Service Dog Certification, Certificate of Dog Registration). The lawsuit asserts violations of the Washington Consumer Protection Act, fraud, breach of contract, breach of express warranty, breach of implied warranty, and unjust enrichment.

The Spokane County, Washington Superior Court has allowed this lawsuit to proceed as a class action for all persons who entered into a contract or parted with any money to purchase a service dog or service puppy from Mary Davies d/b/a Dogology NW or Dog Sciences, LLC d/b/a Unleashed Academy between September 20, 2018 to the final disposition of the action.

The Court has expressed no opinion regarding the merits of the claims.

PLEASE READ THIS NOTICE CAREFULLY. IF YOU ARE A MEMBER OF AT LEAST ONE OF THE CLASSES, THIS LAWSUIT WILL AFFECT YOUR RIGHTS.

1. Why did I get this Notice?

You received this Notice because the Court in charge of this lawsuit has ordered that this Notice be sent to members of the Class and you were identified as a member of the class. The Court in charge of this case is the Spokane County Superior Court and the case is called *Larsen et al. v. Dog Sciences, LLC d/b/a Unleashed Academy and Mary Davies d/b/a Dogology NW*, Case No. 23-2-03546-32.

The purpose of this Notice is to inform you about this lawsuit, the certification of the Class, and

your options of staying in the classes or asking to be excluded from the case.

2. What Is this Lawsuit About?

Plaintiffs allege that Defendants violated the Washington Consumer Protection Act, and committed other contract and tort violations relative to falsely advertising credentials of “certified behaviorists” and “certified professional behaviorists” who would tailor-train service animals to the needs of the disabled handler; by using adhesive and unconscionable contracts attempting to shorten the statute of limitations to one year from date of contracting, to waiving the right to trial by jury, to waiving implied warranties, to forcing litigation in Spokane, Washington and to apply Washington law even though Defendants advertised nationwide, and capping recovery at the amount paid to Defendants; by giving unqualified (and later breached) warranties “certifying” the sold dogs as “service animals,” “psychiatric service animals,” or “autism service animals” through illusory *Service Dog Certifications* and *Certificates of Dog Registration*.

Defendants have denied the claims in this lawsuit.

The Court has not decided whether Defendants violated the law. By allowing the case to go forward as a class action and this Notice to be issued, the Court is not suggesting that Plaintiffs will win or lose.

3. What is a class action?

In a class action, one or more people called class representatives (in this case, Suzanne Larsen, Amelia Lyle, and Virginia Edmonds) sue on behalf of people who have similar claims. If the Court “certifies” the class (i.e., approves the case for class treatment), the Court resolves the issues for all class members except for those who “exclude” themselves from the class (otherwise known as “opting out” of the class and the class action).

4. What Are My Options?

DO NOTHING	You do not need to do anything to be included in the class.
EXCLUDE YOURSELF	If you do not want to be included in the lawsuit, you must send a letter asking to be excluded postmarked no later than April 20, 2025, and will not be bound by the outcome of the lawsuit or share in any money recovered in it.

5. Do I have a Lawyer in this Case?

Yes. The Court has appointed Adam P. Karp of Animal Law Offices, PLLC as Class Counsel. Unless you elect to exclude yourself from the lawsuit, you will be represented by Class Counsel in the litigation.

Although it is not necessary, you have the right, if you wish to do so, to retain your own attorney at your own expense.

If you have questions about the lawsuit, you may contact Class Counsel at the addresses below:

Animal Law Offices, PLLC
114 W. Magnolia St., Ste. 400-104
Bellingham, WA 98225
888.430.0001
adam@animal-lawyer.com

6. How Will the Lawyers be Paid?

Class Counsel will not charge you directly for work in this case. If Plaintiffs recover money, Class Counsel will be paid whatever attorney's fees the Court orders. Those fees may be subtracted from the recovery obtained from Defendants or be paid separately by Defendants, or they may be paid under a combination of the two.

7. What are my Options?

After reviewing this Notice, you have two options. You must decide at this stage whether you want to: (1) remain a Class Member and share in any money recovered in the lawsuit; (2) opt-out and exclude yourself from the Classes and lawsuit.

OPTION #1: REMAIN A CLASS MEMBER

8. How Do I Remain in the Class?

If you are a member of the Classes and you do not request to be excluded, you will remain a part of the Class and share in any money recovered in the lawsuit, but give up the opportunity to sue Defendants separately for the claims Mmes. Larsen, Lyle, and Edmonds have asserted. You will be bound by any ruling, settlement or judgment regarding the claims in this case, whether favorable or unfavorable.

If your contact information changes after you receive this Notice, you should contact Class Counsel at the addresses in Section 5.

OPTION #2: OPTING OUT OF THE CLASSES

9. Who Should Opt Out of the Class?

If you want to keep the right to sue or continue to sue any of the Defendants regarding the grounds set forth in Paragraph 2 above, then you should take steps to exclude yourself from this class action. This is called "opting out" of the class action. If you opt out, you will receive no benefits under the lawsuit. You will be able to assert your claim on your own, but Defendants will retain the right to assert any and all defenses to your claim, including the defense that your claim is untimely.

10. How Do I Opt Out of the Class?

To opt out of the Classes, you must mail a written, signed statement that you are opting out of the class action to Class Counsel at:

Animal Law Offices, PLLC
114 W. Magnolia St., Ste. 400-104
Bellingham, WA 98225
888.430.0001
adam@animal-lawyer.com

To be effective, the opt-out statement must (1) contain your name, address, email(s), and telephone number(s); (2) contain the title of the lawsuit, *Larsen et al. v. Dog Sciences, LLC, et al.* (3) include a written statement stating “I wish to be excluded from the Classes,” and (4) be signed and dated.

To be effective, this opt-out statement must be mailed via First Class United States Mail, postage prepaid and must be postmarked on or before April 20, 2025.

Please note that if you submit a timely and valid request for exclusion, you will have no benefits under this lawsuit and will no longer be represented by Class Counsel.

11. Where Can I get More Information?

This Notice summarizes the lawsuit and the Classes certified by the Court. If you have questions, please contact Class Counsel at the contact information in Section 5 above.

There is also information and certain important documents from the case posted on the following website: _____

Again, the important deadlines are:

Last Day To “Opt-Out” of the Class: April 20, 2025

MARY DAVIES, DOG SCIENCES, LLC AND THEIR AGENTS MAY NOT COMMUNICATE WITH YOU ABOUT THIS NOTICE OR THIS LAWSUIT.

PLEASE DO NOT CALL OR CONTACT THE COURT, THE OFFICE OF THE CLERK OF COURT, OR DEFENDANTS WITH QUESTIONS REGARDING THIS NOTICE.

Dated January 22, 2025