

In the
Supreme Court of the United States

CHURCH OF THE GARDENS, et al.,

Applicants,

v.

QUALITY LOAN SERVICES CORP. OF WASHINGTON, et al.,

Respondents.

**DECLARATION OF SCOTT ERIK STAFNE IN SUPPORT OF
APPLICANTS' SUPPLEMENTAL BRIEF RE APPLICATION**

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1. I am counsel for Applicants Church of the Gardens and property owner Alvin B. White in connection with their Application for Emergency Relief directed to Justice Elena Kagan.

2. Applicants were plaintiffs in a civil action removed from Washington State court to the federal court system, and they now seek a stay of enforcement pending appellate review.

3. I submit this declaration in support of Applicants' Supplemental Brief responding to Deutsche Bank National Trust Company's opposition to the emergency stay application, which was filed in the United States Court of Appeals for the Ninth Circuit.

4. The Ninth Circuit has determined that it lacks jurisdiction to adjudicate the emergency stay request. Notwithstanding that determination, Deutsche Bank filed an opposition addressing the merits of the requested stay.

5. Applicants are not submitting Deutsche Bank's opposition as an attachment. The opposition is publicly available through filings made in the Court of Appeals and may be accessed by the Court through PACER, consistent with guidance received from the Clerk's Office.

6. Applicants believe Deutsche Bank's opposition to the emergency stay request White and the Church have filed with this Court contains the same merits arguments as are now before this Court as a result of the Ninth Circuit refusing to consider a stay on jurisdictional grounds. Applicants and their counsel believe that Deutsche Bank is entitled to present its arguments pursuant to the party

presentation principle, which is applicable to this Nation's adversarial system of justice.

7. Deutsche Bank's opposition is publicly available through filings made in the Court of Appeals, and Applicants submit here solely for ensuring that its presentations are considered.

8. Applicants submit this Supplemental Brief so that, consistent with the party presentation principle governing our adversarial system, the Court has the benefit of Applicants' response to the arguments Deutsche Bank has chosen to advance regarding the requested emergency relief.

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

Executed this 22nd day of January, 2026, at Arlington, Washington.

By: *s/ Scott Erik Stafne* WSBA No. 6964
Scott Erik Stafne, declarant.