

FILED
Court of Appeals
Division III
State of Washington
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NO. 357937-III

COURT OF APPEALS
DIVISION III
STATE OF WASHINGTON

CHAD DAVIS, individually and as personal representative of the Estate
of Steven Ward Hall,

Appellant,

vs.

RICHARD CZYHOLD, administrator of the Estate of Marianne E.
Czyhold, and Persons or Parties with interest in these proceedings

Respondents.

RESPONDENT'S RESPONSE BRIEF

MINNICK • HAYNER, P.S.

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I.

INTRODUCTION

This case involves a trial court's determination concerning the transfer of real property located at 1803 E. Alder St., Walla Walla, Washington (hereinafter sometimes referred to as the "Property"). The estate of Marianne Czyhold filed a motion for summary judgment arguing that the conveyance of the Property was a valid transfer from Steven Ward Hall to Marianne Czyhold and Steven Ward Hall as joint owners with right of survivorship. The son of Steven Ward Hall contends that the transfers made by Steven Ward Hall were ineffective and that the Court should rule that the Property remains in the estate of Steven Ward Hall.

The appellant raises only one assignment of error alleging that the trial court erred in granting the Czyhold estate summary judgment motion. Appellant raises three separate issues. First, was the June 5, 2008 Quit Claim Deed signed by Steven Ward Hall and recorded on June 5, 2008 effective to transfer the property? Second, was the unrecorded Deed dated January 15, 2018 and signed by Steven Ward Hall effective to transfer title to the property? Third, was the trial court's reliance on evidence unattached to any affidavit or declaration proper?

This Court's review will show that the trial court did not err in Granting Summary Judgment in favor of Respondent. Appellants have

never provided any evidence showing any intention of Steven Ward Hall contrary to the June 5, 2008 recorded Quit Claim Deed. This deed was signed by Steven Ward Hall, notarized, and transferred the Property into the names of Steven Ward Hall and Marianne Czyhold as joint owners with right of survivorship. Further, a second unrecorded Quit Claim Deed was signed and notarized by Steven Ward Hall that transferred property to Marianne E. Czyhold. The record, including the recorded Quit Claim Deed of record in Walla Walla County, Washington, demonstrates that Steven Ward Hall intended to transfer the Property into his name and the name of his partner, Marianne Czyhold. No evidence of contrary intent has ever been provided by Chad Davis, son of Steven Ward Hall. Respondent argues that decedent Steven Ward Hall had intent to transfer, and did in fact transfer, the Property and no issues of material fact were presented by Appellants that would call into question that intent.

II.

STATEMENT OF THE CASE

A. Factual Background

Marianne E. Czyhold and Steven Ward Hall maintained a long-term committed intimate relationship until Mr. Hall's death on October 7, 2016. At the time of his death, Steven Ward Hall and Marianne Czyhold owned the Property at issue in this appeal. Marianne Czyhold passed

away on February 12, 2017. Richard Czyhold has been appointed as Administrator for the Estate of Marianne E. Czyhold, deceased.

After the death of Marianne Czyhold, Richard Czyhold listed the Property for sale and had received an offer to purchase the Property. Thereafter, Chad Davis, son of Steven Hall, filed a probate for his father's intestate estate and filed the present TEDRA action to determine title to 1803 E. Alder, Walla Walla, Washington (the "Property").

A Quit Claim Deed transferring the Property from Steven W. Hall to Marianne E. Czyhold for love and affection was signed on January 15, 2008 by Steven W. Hall and was notarized by Michelle M. Miller. The original Quit Claim Deed was found in the personal effects of Marianne E. Czyhold by her Administrator after her death. This Quit Claim Deed was never recorded (hereafter "Unrecorded Quit Claim Deed"). It did, however, state on the face of the Deed that "until the state tax lien is satisfied" title to the property would be "joint tenancy with right of survivorship." The sole grantee on this Deed was Marianne E. Czyhold. A true and correct copy of the Deed is attached hereto as Exhibit "A". Counsel for Respondents had the original Unrecorded Quit Claim Deed in hand at time of hearing on the Motion for Summary Judgment.

A second recorded Quit Claim Deed was signed by Steven W. Hall and notarized that transferred ownership of the Property from Steven W.

Hall to Steven W. Hall and Marianne Czyhold. This Deed was signed on June 4, 2008. It was notarized by Michelle Miller and was recorded under Walla Walla County Auditor No. 2008-05657 on June 5, 2008 (hereinafter at times referred to as the "Recorded Quit Claim Deed"). This Deed also states that the Property would be recorded as a joint tenancy with right of survivorship until such time as the Washington State tax lien is satisfied. The accompanying Real Estate Excise Tax Affidavit was also signed by Steven W. Hall. A true and correct copy of the second recorded Quit Claim Deed and Real Estate Excise Tax Affidavit are attached hereto as Exhibit "B".

After the recorded transfer, property tax statements for the Property were mailed to Steven W. Hall and Marianne Czyhold with a notation JTWR0S to 305 Ash St., Apt. 119, Walla Walla, Washington. Tax statements were also sent to Steven W. Hall and Marianne Czyhold at 55 Rancho Villa, Walla Walla, Washington. These addresses were addresses for Marianne Czyhold where it is believed that Steven W. Hall spent a significant amount of time. A copy of the tax statements were attached to Respondent's Memorandum as Exhibit "C". CP 12. The Walla Walla County Assessor's website currently lists the owners of the Property as Steven W. Hall and Marianne Czyhold as shown in the

“Property Details” attached TO Respondent’s Memorandum as Exhibit "D". CP 12.

Utility invoices for the Property were sent in both names to Steven W. Hall and Marianne Czyhold at 1803 E. Alder St., Walla Walla, Washington. Copies of utility statements were attached to Respondent’s Memorandum as Exhibit "E". CP 12.

At the time of Steven W. Hall’s death, the property tax lien against the Property remained unsatisfied. As of March 20, 2017, the State of Washington Department of Revenue confirmed to Richard Czyhold that the total balance due and owing on the deferral account was \$27,860.69. A copy of the letter from the Department of Revenue confirming a tax lien, as well as a copy of the recorded tax lien, were attached to Respondent’s Memorandum as Exhibit "F". CP 12.

Chad Davis now alleges that due to defects in the two Quit Claim Deeds title to the Property should have remained solely in the name of Steven W. Hall, and that Mr. Davis, as the only child of Steven W. Hall, should be entitled to the Property.

B. Procedural Background

Respondent filed his Motion for Summary Judgment and accompanying Memorandum on October 30, 2017. Hearing on the Motion took place in Walla Walla County Superior Court on December 11, 2017.

An Order Granting Summary Judgment was filed December 11, 2017, from which Appellants now appeal.

IV.

ARGUMENT

A. Summary Judgment Standards.

A motion for summary judgment is appropriate whenever the pleadings, depositions and other records on file, together with any declarations and affidavits submitted with the motion, show that there are no genuine issues as to any material facts and that the moving party is entitled to judgment as a matter of law. CR 56(c); *Teagle v. Fischer & Porter Co.*, 89 Wn.2d 149, 570 P.2d 438 (1977). All inferences must be made in favor of the non-moving party. If there are no genuine issues of material fact, the motion should be granted. *Meissner v. Simpson Timber Company*, 69 Wn.2d 949, 421 P.2d 674 (1966). An issue of material fact is one upon which the outcome of the litigation depends. *West Coast Stationary v. Kennewick*, 39 Wash. App. 466, 694 P.2d 1101 (1985).

A mere assertion of an unresolved factual question is not sufficient to defeat a motion for summary judgment. *Jacobsen v. State*, 89 Wn.2d 104, 569 P.2d 1152 (1977). Moreover, a party resisting a motion for summary judgment cannot rely upon speculation and allegations to meet contrary facts. *Kyreacos v. Smith*, 89 Wn.2d 425, 572 P.2d 723 (1977).

Once the moving party makes a showing of entitlement to judgment, the opposing party must come forward with specific facts to establish the existence of a genuine issue for trial and may not rely on allegations in the pleadings, but must set forth by affidavit or other means the specific facts showing that there is a genuine issue for trial. *Dwinell's Central Neon v. Cosmopolitan Chinook Hotel*, 21 Wash. App. 929, 587 P.2d 191 (1978); *Young v. Key Pharmaceuticals*, 112 Wn.2d 216, 226, 770 P.2d 182 (1989). An affidavit in opposition to a motion for summary judgment is not sufficient to raise a genuine issue of material fact if it merely alleges facts without providing supporting evidence. Affidavits may not be merely conclusive and must not contain hearsay or other inadmissible evidence. *Dwinell's Central Neon v. Cosmopolitan Chinook Hotel*, supra; *Gunnar v. Brice* 17 Wash. App. 819, 565 P.2d 1212 (1977).

B. Appellants fail to present any factual evidence showing a genuine issue of material fact.

Appellants, in response to Respondent's motion for summary judgment, relied entirely upon arguments as to alleged defects in the Quit Claim Deeds, but presented no actual factual evidence that would present a genuine issue of material fact calling into question Steven Ward Hall's intent to transfer the property into his name and Marianne E. Czyhold's name as joint owners with right of survivorship.

After Respondent presented his evidence in favor of his motion for summary judgment, Appellants bore the burden to present specific facts to establish the existence of a genuine issue for trial. *Dwinell's Central Neon v. Cosmopolitan Chinook Hotel*, 21 Wash. App. 929, 587 P.2d 191 (1978); *Young v. Key Pharmaceuticals*, 112 Wn.2d 216, 226, 770 P.2d 182 (1989). An affidavit in opposition to a motion for summary judgment is not sufficient to raise a genuine issue of material fact if it merely alleges facts without providing supporting evidence. *Id.*

Here, Appellants' Response to the Motion and Memorandum for Summary Judgment presented no factual evidence showing a contrary intent of Steven Ward Hall than that intent to transfer the Property to Marianne E. Czyhold and himself as joint tenants. CP 15. In the absence of such evidence, summary judgment in favor of Respondent was appropriate.

C. Supporting affidavit was not required.

Appellants argue that the trial court erred in relying upon inadmissible evidence without a supporting affidavit. Appellant's Brief, page 7. Appellants argue that a motion for summary judgment must be accompanied by supporting affidavits. CR 56. However, CR 56 states in part "A party against whom a claim, counterclaim, or cross claim is asserted or a declaratory judgment is sought may move *with or without*

supporting affidavits for a summary judgment in such party's favor as to all or any part thereof.” CR 56(b), emphasis added. “The motion and any supporting affidavits, memoranda of law, or other documentation shall be filed and served not later than 28 calendar days before the hearing.” CR 56(c).

CR 56 specifically states that a defending party may file a motion for summary judgment with or without supporting affidavits. In this case, all evidence was attached to a supporting Memorandum because Marianne E. Czyhold had by that time passed away. CP 12.

Further, at the time of hearing on Respondent’s Motion for Summary Judgment, counsel for Respondent argued that Appellants should be barred from making such argument based upon the equitable doctrine of laches. Steven Ward Hall died on October 7, 2016, four months prior to the death of Marianne E. Czyhold, who passed away on February 12, 2017. CP 12. Chad Davis, son of Steven Ward Hall and the first Administrator of the Estate of Steven Ward Hall, waited until May 12, 2017 to assert ownership of the Property.¹ CP 12. Respondent was unduly prejudiced by this delay since a signed affidavit by Marianne E.

¹ Chad Davis was later disqualified as Administrator of the Estate of Steven Ward Hall when it was discovered Mr. Davis has multiple felony convictions. Linda *** is currently serving as Administrator of the Estate of Steven Ward Hall.

Czyhold could no longer be produced regarding the facts and circumstances surrounding the Property transfer.

“Laches” is an equitable defense that a party may invoke if it can prove that: (1) the plaintiff knew or reasonably should have known the facts giving rise to the action, but (2) unreasonably delayed bringing the action, and (3) the delay caused damages to the defendant. *Robin L. Miller Const. Co., Inc., v. Coltran*, 43 P.3d 67, 110 Wash. App. 883 (2002). In determining whether the delay was inexcusable, under the doctrine of laches, a court may look to a variety of factors including similar statutory and rule limitation periods; but the main component of the doctrine is not so much the period of delay in bringing the action, but the resulting prejudice and damage to others. *Clark County Public Utility Dist. No. 1 v. Wilkinson*, 991 P.2d 1161, 139 Wn.2d 840 (2000).

In the present case, Chad Davis waited until after the death of Marianne E. Czyhold to assert an ownership interest in the Property. The death of Marianne E. Czyhold, the only witness with personal knowledge regarding transfer of the Property, resulted in extreme and undue prejudice to the Estate of Marianne E. Czyhold. The extreme prejudice caused by this delay warrants the Court’s application of the laches doctrine.

Should this court respectfully rule otherwise, CR 56 specifically contemplates and allows motions which are accompanied by other

evidence. In the present case, the Memorandum contained numerous evidentiary exhibits, including a true and correct copy of an original unrecorded notarized quit claim deed, a recorded quit claim deed of record with the Walla Walla County Auditor, recording number 2008-05657, a tax lien also of record with the Walla Walla County Auditor, and other documents evidencing Steven Ward Hall's intent to transfer the Property to Marianne E. Czyhold. CP 12. Although counsel for Appellants objected to the evidence at time of hearing, Appellants never filed a motion to strike Respondent's evidence, and the evidence was properly received and considered by the trial court.

Should this court respectfully disagree and rule that a portion of Respondent's evidence should have been excluded by the trial court, such reliance was harmless error on the part of the trial court. Where **error** is committed but the result could not have been changed by the mistake, the **error** is **harmless**. *Kennedy v. Clausing*, 74 Wn.2d 483, 445 P.2d 637 (1968); *Mehrer v. Easterling*, 71 Wn.2d 104, 426 P.2d 843 (1967); *McCartney v. Old Line Life Ins. Co.*, 3 Wash. App. 92, 472 P.2d 581 (1970).

In the present action, Appellants argue that the trial court's consideration of property tax statements and utility bills was improper. Such reliance is harmless error where other evidence, including the

Recorded Quit Claim Deed, notarized Unrecorded Quit Claim Deed, and the recorded tax lien, all of record in Walla Walla County, were properly considered by the trial court. Further, no evidence was ever offered by Appellants showing a contrary intent of Steven Ward Hall, leaving Appellant's burden of proof unsatisfied.

D. Summary Judgment in favor of Respondents was appropriate.

A deed should be construed to give effect to the intentions of the parties, paying particular attention to the intent of the grantor in giving meaning to the entire language of the deed. *Carr v. Burlington Northern, Inc.*, 597 P.2d 409, 23 Wash. App. 386 (1979). The intention of the grantor must be ascertained from the deed itself. *Cook v. Hensler*, 107 P.178, 57 Wash. 392 (1910).

Construction of deeds is a matter of law for the courts. *Martin v. City of Seattle*, 765 P.2d 257, 111 Wn.2d 727 (1988), reconsideration denied.

Respondent produced significant evidence showing an intent on the part of Steven Ward Hall to transfer the subject Property to himself and Marianne E. Czyhold as joint tenants with right of survivorship. CP 12. This evidence included the Recorded Quit Claim Deed, the Unrecorded Quit Claim Deed and other supplemental evidence. Appellant fails to produce *any* evidence showing a contrary intent.

Where the recorded quit claim deed is unambiguous, and where the grantor's intent is clear, then the deed construction is a matter of law for the court. *Martin v. City of Seattle*, 765 P.2d 257, 111 Wn.2d 727 (1988). In the present case, both the deeds themselves show Steven Ward Hall's intent was clear. Absent any factual evidence to the contrary, the court's order for summary judgment is proper.

E. Quit Claim Deeds were effective to transfer title.

For a deed to be valid, it must be in writing, signed by the party to be bound thereby, and acknowledged. RCW 64.04.020; *Saunders v. Callaway*, 708 P.2d 652, 42 Wash. App. 29 (1985). Love and affection constitute sufficient consideration to support a conveyance. *Powers v. Munson*, 133 P.453, 74 Wash. 234 (1913).

A legal description is not void for uncertainty where it is not so uncertain as to render impossible the ascertainment of the boundaries intended to be established and the territory intended to be included therein. *Dixon v. City of Bremerton*, 171 P.2d 243, 25 Wn.2d 508 (1946).

Under Washington law, a finding of ambiguity in the language of the deed is not required to consider extrinsic evidence of the surrounding circumstances and the subsequent conduct of the parties. *King County v. Rasmussen*, 299 F.3d 1077 (2002).

Here, Respondent has attached both the Recorded Quit Claim Deed and Unrecorded Quit Claim Deed for this Court's review. Both were previously attached to Respondent's Memorandum. CP 12. The first, Unrecorded Quit Claim Deed used the Washington statutory form. The deed was in writing, signed by Steven Ward Hall, and notarized. Consideration was love and affection. Marianne E. Czyhold was listed as sole Grantee.² The indexing information of the Unrecorded Quit Claim Deed included both the abbreviated legal description "Valley Homes W/74' of S 110' of Lot 7." The parcel number to the Property was also accurately listed as Assessor's Property Tax Parcel/Account #360722560096. The legal description was not written in below in the body of the Unrecorded Quit Claim Deed.

A deed, to be valid, must contain either such description of land conveyed that it can be properly and clearly identified or a reference to another instrument included with a sufficient description of the land. *Barth v. Barth*, 143 P.2d 542, 19 Wash.2d 543 (1943). Here, the Unrecorded Quit Claim Deed references in the recitals the correct portion of Lot 7 of the Valley Homes subdivision and is readily identifiable. The legal description is not repeated below. In the case of *Marvin v. Yates*, 66 P.

² The deed references that the deed be recorded as "joint tenancy with right of survivorship" and may have been intended as a transfer to both Steven Ward Hall and Marianne E. Czyhold.

131, 26 Wash. 50 (1901), the court held that in an action to recover a share of profits realized from a real estate transaction, the recitals in certain deeds as to the prices paid will be deemed conclusive evidence in the absence of evidence to the contrary. *Marvin v. Yates*, 66 P. 131, 26 Wash. 50 (1901). In the present case, there is a lack of any evidence to the contrary the exact parcel which Steven Ward Hall intended to convey.

The second, Recorded Quit Claim Deed was in writing (also using the statutory form), was signed by Steven Ward Hall and was notarized. The Grantees to this deed were Marianne Czyhold and Steven W Hall. This deed did list the abbreviated legal description "Valley Homes W/74' of S 110' of Lot 7 where it should have been located on the deed. Consideration was mistakenly listed as "Steven W Hall + Marianne Czyhold" and their respective addresses were thereafter listed in the Grantee lines. However, the recitals correctly listed the Grantees Marianne Czyhold and Steven W Hall, along with the same correct information as listed in the Unrecorded Quit Claim Deed.

The two deeds, taken together, contain all of the information necessary for transfer of the Property. Even if found defective, the two deeds clearly evidenced intent on the part of Steven Ward Hall to transfer the Property to Marianne Czyhold as joint tenants. Absent any contrary evidence, summary judgment was proper.

Appellants next argue that the transfers should be determined as a fee simple determinable. It is undisputed that a tax lien existed on the Property at the time of Steven Ward Hall's death. Thus, such a fee determination is unnecessary and irrelevant.

V.

CONCLUSION

Appellants fail to address the obvious intent of Steven Ward Hall to transfer the Property located at 1803 E. Alder Street, Walla Walla to Marianne E. Czyhold. Appellants also fail to address the complete absence of evidence of any genuine issue of material fact counter to Mr. Hall's intent to transfer. Respondent produced multiple documents, three of which were previously recorded in Walla Walla County, evidencing intent to transfer. Given the two prior quit claim deeds, and absent any contrary evidence, the trial court properly granted summary judgment in favor of the estate of Marianne E. Czyhold.

DATED this 14 day of June, 2018.

MINNICK-HAYNER

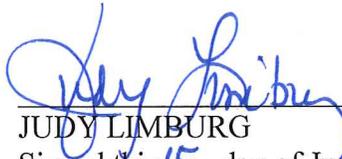
By: Mona Geidl
Mona J. Geidl, WSBA #42455
Of Attorneys for Respondent

CERTIFICATE OF SERVICE

I hereby certify that on the 15 day of June, 2018, I caused to be served a true and correct copy of **RESPONDENT'S RESPONSE BRIEF** by the method indicated below, and addressed to the following:

Jeremy Hyndman
Basalt Legal, PLLC
6 ½ N. 2nd Ave., Suite 200
P.O. Box 946
Walla Walla, WA 99362

 U.S. Mail, Postage Prepaid



JUDY LIMBURG

Signed this 15 day of June 2018
at Walla Walla, Walla Walla County, WA

REAL ESTATE EXCISE TAX

JUN 05 2008

EXEMPT # 115135
WALLA WALLA COUNTY
TREASURER

Return Address:

CY HOLD
Marianna E. Gifford
169 N Alder Ave #13
Walla Walla WA 99362

QUIT CLAIM DEED (Statutory Form)

Indexing information required by the Washington State Auditor's/Recorder's Office. (RCW 36.18 and RCW 65.04) 1/97:		(please print last name first)
Reference # (if applicable): _____		
Grantor(s) (Seller): (1) <u>Steven W Hall</u>	(2) _____	Add'l. on pg _____
Grantee(s) (Purchaser): (1) <u>Marianna E Gifford</u>	(2) <u>Steven W Hall</u>	Add'l. on pg _____
Legal Description (abbreviated): <u>Valley Home w/74' of 110'</u>		Add'l. legal is on pg _____
Assessor's Property Tax Parcel /Account # <u>0 3607 2256 0096 of Kat 7</u>		

THE GRANTOR() Steven W Hall
of 1803 E Alder Street City of Walla Walla
County of Walla Walla State of Washington for and in consideration
of Steven W Hall + Marianna Gifford convey and quit-claim to
169 N Alder Ave #13 of 169 N Alder Ave #13 City
of Walla Walla County of Walla Walla State of Washington all interest

in the following described Real Estate: Valley Home w/74' of 110' of Kat 7
until such time Washington State Tax Lien is satisfied
this document will be recorded as joint tenancy
with right of survivorship.
situated in the County of Walla Walla State of Washington Dated this Fourth day
of June 2008.

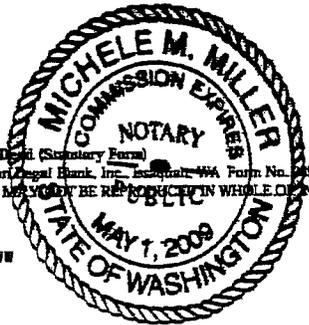
Steven W. Hall
Grantor(s)

STATE OF WASHINGTON }
County of Walla Walla } SS. (INDIVIDUAL ACKNOWLEDGEMENT)

I certify that I know or have satisfactory evidence that Steven W. Hall is the
person who appeared before me, and said person acknowledged that he signed this instrument and acknowledged it to be
his free and voluntary act for the uses and purposes mentioned in the instrument.

Dated this 4th day of June 2008

Michele M Miller
Print Name Michele M. Miller
Notary Public in and for the State of WA
My appointment expires 05/01/09



Quit-Claim Deed (Statutory Form)
© Washington Legal Bank, Inc., Escrow WA Form No. 149 6/97
MATERIAL MAY BE REPRODUCED IN WHOLE OR IN PART IN ANY FORM WHATSOEVER.

EXHIBIT "B"



2008-05657
Page: 1 of 1
06/05/2008 10:05A

Return Address:

Marianne E. Byhall
1803 E Alder Street
Walla Walla WA 99362

QUIT CLAIM DEED (Statutory Form)

Indexing information required by the Washington State Auditor's/Recorder's Office. (RCW 36.18 and RCW 65.04) 1/97:		(please print last name first)
Reference # (if applicable):		
Grantor(s) (Seller): (1) <u>Steven W. Hall</u>	(2) <u>5</u>	Add'l on pg
Grantee(s) (Purchaser): (1) <u>Marianne E. Byhall</u>	(2) <u>5</u>	Add'l on pg
Legal Description (abbreviated): <u>Valley Acres w/ 74' of S 110' of</u>		Add'l. legal is on pg <u>7 of 7</u>
Assessor's Property Tax Parcel /Account #: <u>360722560096</u>		

THE GRANTOR Steven W. Hall
of 1803 E Alder Street City of Walla Walla
County of Walla Walla State of Washington for and in consideration
of with severally convey and quit-claim to
Marianne E. Byhall of 594 N. 1st Street City
of Walla Walla County of Walla Walla State of Washington all interest
in the following described Real Estate:

until such time that Washington State when is satisfied, this document will be recorded as Joint Tenancy, with right of survivorship
situated in the County of Walla Walla, State of Washington Dated this 15th day
of January 2008.

Grantor(s) Steven W. Hall

STATE OF WASHINGTON

County of Walla Walla } SS. (INDIVIDUAL ACKNOWLEDGEMENT)

I certify that I know or have satisfactory evidence that Steven W. Hall is the person who appeared before me, and said person acknowledged that he signed this instrument and acknowledged it to be his free and voluntary act for the uses and purposes mentioned in the instrument.

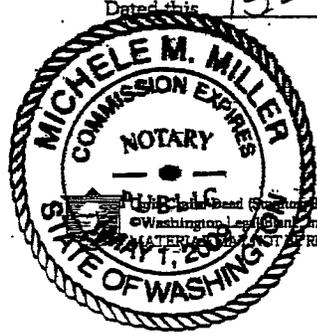
Dated this 15th day of January 2008.

Michele M. Miller

Print Name Michele M. Miller

Notary Public in and for the State of Washington

My appointment expires: May 1, 2009



Pub-16 (Quit Claim Deed) (Statutory Form)
© Washington Legal Council, Inc., Issaquah, WA Form No. 289 6/97
REPRODUCED IN WHOLE OR IN PART IN ANY FORM WHATSOEVER.

EXHIBIT "A"

MINNICK HAYNER

June 14, 2018 - 4:19 PM

Transmittal Information

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Appellate Court Case Title: In re the Estate of: Steven Ward Hall
Superior Court Case Number: 17-4-00095-5

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