

72193-3

72193-3

Court of Appeals, Division 1

State of Washington

Case Number 721933

Edwards vs. Mulvihill

The Honorable Judge William Downing

Superior Court of King County

Colleen Edwards, Appellant

Vs.

Patrick Mulvihill, Respondant

Colleen Edwards

3377 Bethel Road SE, Ste 107, PMB 129

Port Orchard WA 98366

360 710 3889 Email: springshwiers5@gmail.com

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2010-10-21 10:09:09

Handwritten signature/initials

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INTRODUCTION

This appeal concerns the Superior Court of King County, the Honorable Judge William Downing's order of summary judgment and dismissal terminating the rights of the plaintiff in a conversion case. The case had originally been filed and moved from the jurisdiction of Kitsap County to King County. The original summons and complaint and the rulings and Kitsap County court relinquishing jurisdiction are attached in the appendix due to the fact that the Kitsap County file was 135 but was not separated by the King County Superior Court's Clerks Office. I include the summons and complaint and the orders regarding jurisdiction so that this court can see them as separate documents. With the jurisdictional issue and transfer of fees not at issue before this court, I concentrate on the CR 12 , summary judgment and dismissal issues before the King County Superior Court and the issues of lawful and unlawful conversion.

ASSIGNMENTS OF ERROR

1. Did the trial court error in dismissing the case and terminating the plaintiff's conversion case? Should the trial court have not dismissed the case due to lack of compliance with discovery by the defendant?
2. Did the trial court error in determining summary judgment correct?
3. Did the trial court error in ruling issues associated with the breach of fiduciary duty case regarding new case filings and costs of that case and its appeal? Did the trial court fail to understand this court and the Supreme Courts ruling in that case?
4. Did the trial court error in giving the defendant attorney's fees?
5. Did the trial court error in failing to recognize the importance of the Colleen Edwards Special Needs Trust and the issue of an illegal testimonials trust co-existing as an unlawful conversion.
6. Did the trial court error in not recognizing the probate inventory as lacking a proper accounting, errors in the amount to the beneficiary or her interests as unlawful conversion by the personal representative and trustee of the testimonial trust.

STATEMENT OF THE CASE

After my divorce the court ordered my trustee attorney and I to create a special needs trust because I am Social Security Income because of my sensory and physical disabilities. CP 11, CP 12, CP 13. My mother as grantor and attorney in fact signed the trust in existence in 2003.

In 2005 the Kitsap County Superior Court became my trustee because Guardianship Services of Seattle withdrew as trustee and I needed expenses for my service dogs, transportation and medical care not covered by government benefits. CP 11, 12.

My mother passed away in October 2007 and she had a Last Will & Testament. CP 11, 12

My brother, Patrick Mulvihill was the personal representative in 2007 and 2008. CP 8, 14

Mr. Mulvihill corresponded with my special needs trust attorney in 2007. CP 14

Mr. Mulvihill established a testimonial trust in 2008 CP 14.

In 2009 I filed a breach of fiduciary duty case and it was dismissed without prejudice to refile CP 14

In 2009 Mr. Mulvihill admitted in his response that he created the Colleen Edwards Trust, a testimonial trust. CP 7, 8, 9.

Because of the lack of record this court and the Supreme heard motions and briefs on payment for the record in that case. I had no access to no fund, eventually it the appeal was mandated without a decision. See appendix.

in 2011 I refiled the breach of fiduciary duty case and it was personally served in March 12, 2012 with this case and interrogatories on both cases. CP 9

In 2011 I filed an emergency motion for housing/ CP 13 & Appendix

In 2012 Mr. Mulvihill was served with a summons, comp

In 2011-2013 this case was under the jurisdiction of the Kitsap County court and transferred to the Superior Court of King County. See Appendix.

In 2014 Mr. Mulvihill filed a CR 12 motion to dismiss this case. CP 7, 8

In 2014 I responded to the motion to dismiss, CP 11, 12

In (2012 and again in 2013 my physician documented my medical needs that were not being meet including the "dismal" condition of my aged, damaged mobile home and my lack of a replacement service dog. Also documented is the fact that I suffered from hypothermia in 2013 due to the conditions in my home. CP 13

I was also scheduled for extensive surgery who occurred after this case went to appeal.

I was also unable to receive home health / personal care services in 2012 and 2014 because of poor condition of my mobile home. CP 13

CP 13

I am physically and sensory disabled. CP 13

Prior to the hearing on June 6, 2014 I began to look closely at the documents in the probate and breach of fiduciary duty case and the Last Will and Testament of Marion d. Mulvihill and I found several facts.

a. My mother specified in her will that the funds should go into a special needs trust.

- b. I noticed the figures on the probate inventory were incorrect and with no receipts.
- c. I noticed that my special needs trust had language and a trust instrument that never occurred in the testimonial trust. CP 11, 12.

These are of concern were documented in my pleadings. CP 11, 12.

On June 6, 2014 a hearing was held with both parties attended. CP 15

Mr. Mulvihill admitted during the hearing that he had not responded to the interrogatories. VT 6/6/2014.

On June 9, 2014 the Honorable William Downing issued his written decision dismissing the case with summary judgment. CP 17

Mr. Mulvihill replied to my response to motion to dismiss with documentation from my trustee attorney. CP 14

A notice of appeal was filed and this appeal was perfected with appropriate records and verbatim transcript of the dismissal hearing in November 2014. See Appendix.

ARGUMENT

1. Did the trial court error in dismissing the case and terminating the plaintiff's c Conversion case? Should the trial court have not dismissed the case due to lack of Compliance with discovery by the defendant?

This case should not have been dismissed as there is evidence of unlawful use of the probate funds passing to the trust in a smaller amount than was even on the inventory prepared by Mr. Mulvihill. Even if these amounts on the inventory had receipts or other documentation which there were no receipts or documentation. This is a violation of the law and is conversion by the personal representative and trustee who are the same person.

At the court hearing. How can you have a proper accounting with no receipts, documents. The second issue is there are no funds in the testimonial trust from the sale of the real estate. Even if you accept that Mr. Mulvihill inventory estates are correct then you will see on my analysis of the inventory and the Last Testament and Will of Marion D. Mulvihill is that the I am entitled to my share of that inheritance real estate depending upon the work or lack of work that Mr. Mulvihill did to the real estate. So we have an amount ranging from \$88,000 to \$200,000 missing.

If Mr. Mulvihill did the work on the house then he would have receipts for it. Now Mr. Mulvihill has been asked for receipts and documents under interrogatories starting in 2011-2012 but he has never answered those, nor the interrogatories sent under the refiled complaint in the breach of fiduciary duty case. While jurisdiction issues were being discussed I knew I could not move for on discovery. Conversion is defined as "

A conversion is defined as a willful interference with a chattel without lawful justification, whereby a person entitled to possession of the chattel is deprived of the possession of it" raised triable issue as to whether defendant wrongfully retained money received)) (trial court erroneously dismissed conversion claim where evidence raised triable issue as to whether defendant wrongfully retained money received)16 WAPRAC § 14:16

Elements of an action 29 WAPRAC § 8:1

The essential elements of pleading a conversion cause of action under Washington law are:

1. The defendant willfully interfered with a chattel.

It is logical to assume that the loss of property to a beneficiary or a beneficiary's trust cannot be conversion.

2. The defendant acted without lawful justification.

The personal representative and trustee have a duty to have "clean hands" and handle the beneficiary interests and follow the Last Will and Testament.

In this case the Will was not followed for Colleen Edwards interests.

3. The plaintiff was entitled to possession of the chattel.

Colleen Edwards and her special needs trust are entitled to her share of her inheritance.

4. The plaintiff was deprived of such possession

Colleen Edwards and her special needs trust have been deprived of her inheritance.

"Supreme Court would remand case to determine if personal representative of nonintervention estate breached his fiduciary duty by commingling his personal funds

and estate funds, in proceedings to re-move personal representative; although there was evidence that personal representative had made distributions from his personal account and repaid him-self with estate funds, it was necessary to complete a final accounting to see if all funds were accounted for, or if a breach had occurred." In the Matter of the ESTATE OF Marcella Louise JONES, Deceased.

Jeffrey P. Jones and Peter C. Jones, Petitioners, v. Russell K. Jones, Respondent, 152 Wash 2d 1, 93 P 3d 147 (2014).

So without other documents we see the issue of the estate's real estate as used by the personal representative and trustee as wrongfully used if not compensated to beneficiaries. The fact that Mr. Mulvihill is also a beneficiary may necessity his compensation of Colleen Edwards or her trust for his usage. Considering there were other items of personal and monetary property that are missing from the probate inventory then the amount considered here would be considerably higher than the inventory reflect.

Wrongful intent is not a necessary element of conversion, and good faith cannot be shown as a defense to conversion. One who takes a chattel from its owner without right but unuer a mistaken belief it is his own is still guilty of conversion. "Brown ex rel. Richards v. Brown, 157 Wash. App. 803, 239 P.3d 602 (iv. 1 (2001)(trial court erred in dismissing claim for conversion where evidence raised triable issue as to whether defendant wrongfully retained money received"

Discovery -- "Trial court must manage the discovery process in a fashion that promotes full disclosure of relevant information while at the same time protecting

against harmful side effects." Demelash v. Ross Stores, Inc. 105 Wash.App. 508, 20 P.3d 447 (2001)

2. Did the trial court error in determining summary judgment correct?

The trial court erred in considering summary judgment because nothing all of the evidence was related to the issues presented.

"Documents whose contents are alleged in a complaint but which are not physically attached to the pleading may be considered in ruling on a motion to dismiss for the failure to state a claim on which relief can be granted. CR 12(b)(6)" Trujillo v. Northwest Trustee Services, Inc.

181 Wash.App. 484, 326 P.3d 768 (2014)

"On summary judgment, all reasonable inferences from the facts must be considered in the light most favorable to the nonmoving party, and if there is any justifiable evidence supporting a verdict in favor of the nonmoving party, the question is for the jury."

Demelash v. Ross Stores, Inc., 105 Wash.App. 508, 20 P.3d 447 (2001)

" 4 THE COURT: Okay. Good afternoon. Nice to
5 meet both of you. I'm Judge Downing. The matter is
6 assigned here, and today we have a hearing scheduled on
7 the defendant's motion to dismiss. VT 6/6/2014 page 2

I am not sure how the court jumped from a motion to dismiss to a summary judgment with only relevant pleadings and oral argument that gave the court the

information needed to make decisions, but it happened and so now it is an issue before this court.

3. Did the trial court error in ruling issues associated with the breach of fiduciary duty case regarding new case filings and costs of that case and its appeal? Did the trial court fail to understand Judge Canova's trial court dismissal with prejudice this court and the Supreme Courts ruling in that case?

In the breach of fiduciary duty case, The Honorable Judge Canoga dismissed the breach of fiduciary case without prejudice and an option to refile. This case was refiled and served before the statute of limitations ran out, even if the statute might have been tolled while at appeal. What is apparent from Mr. Mulivhill's statements is that he does not understand that the complaint was refiled and personally served in 2012 and he is responsible to address the refiled complaint. The question comes to mind regarding why Judge Downing decided to address the concept of a filing fee for a new case and the clerk's papers in the fiduciary duty case and restrict another court's rulings BEFORE any trial (or appellate activity) could continue

The trial court clearly lacks the ability to rule on an appellate court's decision, but I think the trial court was swayed with the defendant statement as was unused and did not check that the case was dismissed without prejudice. Inspire of this an error formed in the mind of the court.

" 8 As I understand the history, there was a -- in 2009

9 there was a claim brought by Ms. Edwards for negligence

10 and breach of fiduciary and professional duties, that
11 case was dismissed." VT 6/6/2014

It is clear from the transcript the court did not know the case was not dismissed without prejudice. And that would lead the court to think the case was terminated at the trial court level or the appellate level which it was not. So there is a factual mistake here.

4. Did the trial court error in giving the defendant attorney's fees?

The trial court erred in giving the defendant statutory attorney's fees as both sides could have handled their own expenses. In this case the trial court stacked all the expenses it could think of against the plaintiff who is only attempting to resolve her needs regarding her inheritance and trust funds.

This is not a situation where the plaintiff is financially well off. She lives on social security income and pays for her needs as much as possible. Attorney fees are only retaliatory in nature, given her needs not meet by her trustee and deception of her inheritance funds. .

"18 THE COURT: Are you billing the trust for your
19 time?

20 MR. MULVIHILL: Just on defense -- defense
21 litigation, yes.

22 MS. EDWARDS: May I approach that?

23 Judge Mills asked -- said that Mr. Mulvihill could
24 not take attorney's fees when he asked for them in the
25 last hearing. And he did take attorney's fees,

16

1 according to social security, out of the trust. And
2 so, um, additionally every court on the breach of
3 fiduciary duty, except for the first trial court's
4 ruling, has told him he may not take attorney's fees
5 out of this trust, over and over, including an order
6 from the Supreme Court.

7 So I don't know why he doesn't get it. But I will
8 say that in this case, in the conversion case,
9 Judge Mills denied him attorney's fees and told him he
10 could take it up here, but -- but she would not give it
11 to him then" VT 6/6/2014 page 16-17

Now why would this trial court grant free hand to the defendant to dip into funds he has already been ordered not to and dipped his hand into the cookie jar anyway.

But it does clarify one item, Mr. Mulvihill is acting in two capacities against his beneficiary and paying himself from trust funds as an attorney, just as his pleadings suggest, he is playing trustee while he defends not the trust but himself. .

5. Did the trial court error in failing to recognize the importance of the Colleen Edwards Special Needs Trust and the issue of an illegal testimonials trust co-existing as an unlawful conversion.

It is evident from the defendant's use of Mr. Sean Bleck legal counsel that a testimonials trust could create disqualification from her only source of income and medical care if handled improperly and in the hearing, Colleen Edwards related that she had been disqualified from Social Security because of some items the trust paid for that were advocated by an experienced trust attorney not to do to the defendant Mr. Mulvihill.

"... the creation of special needs trusts on behalf of disabled persons, to supplement a disabled person's public benefits without increasing countable assets and resources so as to disqualify the person from public benefits. Medicaid Act, § 1917(d)(4)(A), 42 U.S.C.A. § 1396p(d)(4)(A)." In re Riddell 138 Wash.App. 485, 157 P.3d (2007)

" 4 Mr. Mulvihill continues to disqualify me from my
5 benefits, that's only going to create more pain and
6 suffering, more -- more, um, damage to me and delay my
7 surgeries, et cetera, et cetera.

8 Both social security and DSHS have been very good
9 about the situation, and they know about this court
10 case." VT 6/6/2014 page 12

Why would a trustee ever disqualify his own beneficiary from government benefits? Why would a trial court judge just sit there then say there was no unlawful acts. I have no explanations for the courts disinterest.

6. Did the trial court error in not recognizing the probate inventory as lacking a proper accounting, errors in the amount to the beneficiary or her interests as unlawful conversion by the personal representative and trustee of the testimonial trust.

The trial court was advised of the trustee of her special needs trust being the Superior Court of Kitsap County. The trial court had Mr. Sean Black's letter to Mr. Mulvihill and they also had the Last Will and Testament stating that Colleen Edwards financial assets were to go to her special needs trust which had been signed into existence 2 years before the will was executed. The testimonial trust as a short term holding trust during probate might be understand long term use of the testimonial trust is not beneficial to Colleen Edwards, especially in light of no trust instrument, no legal counsel and no court order from the probate or any other court establishing the trust itself.

"17 THE COURT: Who -- who was the trustee of the
18 needs trust?

19 MS. EDWARDS: The Kitsap County -- I'm sorry,
20 may I answer?

21 THE COURT: Yes.

22 MS. EDWARDS: Yes, the Kitsap -- the special

23 needs trust is in the hands of the Superior Court of
24 Kitsap County, so it's really hard to plead up a
25 trustee.

14

1 THE COURT: Uh-huh.

2 MS. EDWARDS: It is still a viable trust. It
3 has not been terminated, and that is on court record.

4 THE COURT: Okay.

5 MR. MULVIHILL: I'm frankly, dubious of that,
6 because I didn't -- I don't know that the trust -- I" 6/6/2014 page 14-15

I have no explanations of the court lack of concern or two existing trusts, one false and one specified in the Last Will and Testament of my mother who signed the trust into existence four years before her death. And why would a trustee and personal representative dishonor and disobey her will. I don't know why the court would not just drop this issue as if it did not matter. I have no answers, about the trustee or the trial court, however the issue was overlooked and that is an error.

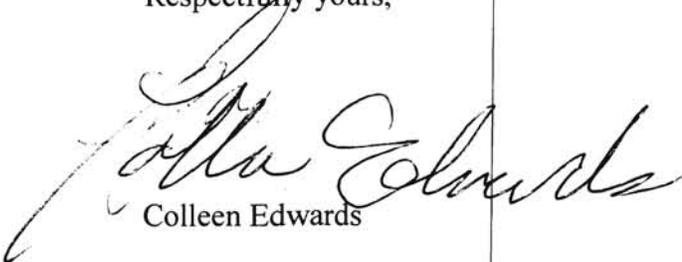
CONCLUSION

I ask this court to remand for a new trial and reverse the orders of summary judgment and dismissal of the trial.

For a trial court to take such drastic measures against the plaintiff without and failing to hold the defendant accountable for his actions and non actions of non responsiveness to discovery and admitted taking of property and funds that belong to the plaintiff and her special needs trust is truly an issue for this court.

I thank you for your time and consideration.

Respectfully yours,



Colleen Edwards

APPENDIX

Summons and Complaint (Kitsap County)

Orders from Kitsap County regarding change in jurisdiction

Hearing Date
12/2/2011

FILED
STATE OF WASHINGTON
SUPERIOR COURT OF KITSAP COUNTY
2011 DEC 21 PM 2:58

Colleen M. Edwards
Plaintiffs

DAVID W. PETERSON
)
)

Summons
11-2-02773-4

vs.
Patrick Mulvihill
Patrick Mulvihill, Personal Representative
Patrick Mulvihill, Attorney at Law
Patrick Mulvihill, Trustee of the Colleen
Edwards Trust
Colleen Edwards Trust

TO THE DEFENDANT: A lawsuit has been started against you in the above entitled court by Colleen Edwards, plaintiff. Plaintiffs claim is stated in the written complaint, a copy of which is served upon you with summons.

In order to defend against this lawsuit, you must respond to the complaint by stating your defense in writing, and by serving a copy upon the person signing this summons within 20 days after the service of summons, excluding the day of service, or a default judgment may be entered against you without notification. A default judgment is one where plaintiff is entitled if what he asks for because you have not responded, you serve a notice of appearance on the undersigned person, you are entitled to notice before a default judgment may be entered.

You may demand that the plaintiff file this law with the court. If you do so, the demand must be in writing and must be served upon the person signing this summons. Within 14 days after you serve the demand the plaintiff must file this lawsuit with the court, or the service on you of this summons and complaint will be void.

If you wish to seek the advice of an attorney in this matter, you should do so promptly so that your written response, if any, may be served on time.

This summons is issued pursuant to rule 4 of the Superior Court Civil Rules of the State of Washington.

[signed] *Colleen Edwards*

Colleen Edwards
(X) Plaintiff () Plaintiffs Attorney
Colleen Edwards 325035
WCCW 9601 Baijaich Road NW
Gig Harbor WA 98322

Dated December 15, 2011
253 858-4200 ext 545 message

Hearing Date
12/22/2011

FILED
KITSAP COUNTY CLERK

2011 DEC 21 PM 2:58

STATE OF WASHINGTON
SUPERIOR COURT OF KITSAP COUNTY

Colleen Edwards)	
Plaintiff)	COMPLAINT FOR
vs)	DAMAGES FOR
Patrick M. Mulvihill, Individually)	UNLAWFUL ONVERSION
Patrick Mulvihill, Personal Representative)	
of the Estate of Marion D. Mulvihill)	
Patrick Mulvihill, Trustee of the Colleen)	11 2 02773 4
Edwards Trust)	
Patrick Mulvihill, Attorney At Law, Owner)	
Of the Law Offices of Patrick))	
Mulvihill)	
Defendant)	

COMPLAINT FOR DAMAGES FOR UNLAWFUL CONVERSION

Plaintiff Colleen Edwards alleges:

I. JURISDICTON AND VENUE

1. The court ha jurisdiction over this action because the action involves the right to title and possession of certain property located in the state of Washington.
2. Plaintiff Colleen Edwards is a resident of Kitsap County, Washington
3. Defendant Patrick Mulvihill is a resident of King County, Washington

II. BACKGROUND FACTS

4. That the last will and testimony of Marion D. Mulvihill specified the property described in her will to be divided by her two surviving son and daughter. And that the property is listed as
5. That the property is listed as an assett to be given to Colleen Edwards in the a.nount of 50 percent of its value or the value of
6. That on or after September 2008 the Colleen Edwards Trust was established.
7. That on or after2008 the Declaration of Completion of Probate was filed.
8. That that asset was not given to Colleen Edwards nor was it given to the Colleen Edwards Trust.
9. That Colleen Edwards asked for a full accounting of the Colleen Edwards Trust and received it on

10. That Colleen Edwards identified that the property was not given to her nor was any proceeds from its transfer, sale or given to her.
11. That Colleen Edwards identified that the property was not given to the Colleen Edwards Trust nor nor was any proceeds from its transfer, sale or given to the Colleen Edwards Trust.
12. That Patrick Mulvihill converted the property for his own use during the years of 2008 to 2011.
13. On or about _____ defendant Patrick Mulvihill took for defendant's use and without plaintiff's authorization a describe property owned by plaintiff. At the time the subject property was rightfully in plaintiff's possession and had a fair market value of amount.
14. The plaintiff is entitled to half of the property's value. The remaining other half belongs to the other heirs.

III. CLAIMS AND CAUSES OF ACTION – WRONGFUL CONVERSION

7. Patrick Mulvihill willfully converted plaintiff's describe property without lawful justification and has deprived plaintiff of possession of the property.

IV. DAMAGES

Defendants wrongful and willful conversion of plaintiff's property has caused plaintiff's the following damages

- a) The Fair Market Value of the property of amount \$
- b) Economic loss due to the loss of the use of the property in an amount to be established at the time of trial.

V. REQUEST FOR RELIEF

Plaintiff Colleen Edwards requests that the court enter judgment against defendant Patrick Mulvihill as follows “

1. Awarding plaintiff damages for the fair market value of the property in an amount not less than \$ state amount. Fifty percent of the property's value.
2. Awarding plaintiff damages for consequential loss from the defendant's willful conduct in an amount not less than \$ specify>
3. Awarding plaintiff statutory costs and attorney fees incurred in this action.
4. Awarding plaintiff any further or additional relief which the court finds equitable, appropriate or just.

Dated: December 15, 2011

Colleen Edwards

Colleen Edwards
325035

Pro SE
9601 Baiaich Road NW
Gig Harbor WA 98332-8300

SUPERIOR COURT OF WASHINGTON
COUNTY OF KITSAP

CALLEEN EDWARDS

Hon./Comm. LEILA MILLS

Court Reporter ANDREA RAMIREZ

Court Clerk ANGIE SMITH

Date NOVEMBER 15, 2013

PATRICK MULVIHILL

Respondent/Defendant

No. 11-2-02773-4

Pet/Pla appeared yes through/with Counsel Pro-Se
Pet/Pla appeared _____ through/with Counsel _____
Resp/Def appeared yes through/with Counsel Pro-Se
Resp/Def appeared _____ through/with Counsel _____
Guardian Ad Litem appeared _____ State / Other appeared _____

THE MATTER BEFORE THE COURT Show Cause re: _____
 Motion for default / to compel re: Change of Venue
 Unlawful Detainer Minor Settlement Summary Judgment Supplemental Exam
 Entry of Order Status/Review Settlement on the Record

Testimony taken:
Because this case should have been filed in King County Ms. Edwards is responsible to pay filing fee and transfer fee -
Court will waive transfer fee - finds Ms. Edwards
independent
Mr. Mulvihill - asking for attorney fees, Ms. Edwards
is draining her trust for
Ms. Edwards objects to attorney fees.
Attorney fees should be addressed in King County
for future hearings

Courtroom polled for _____ No response Time _____
 Default Granted Writ Granted Judgment Approved
 The Court grants/denies motion. The Court takes the matter under advisement.
 Order signed as presented. Order to be presented.
 This matter stricken/continued. Court Scheduler advised
 Court sets _____ hearing at _____ am/pm on _____
 Pleadings/File taken from this hearing by _____

46

A

RECEIVED AND FILED
IN OPEN COURT

JUN 29 2012

DAVID W. PETERSON
KITSAP COUNTY CLERK

SUPERIOR COURT OF WASHINGTON FOR KITSAP COUNTY

EDWARD

Plaintiff/Petitioner,

v.

MULVHILL

et al

Defendant/Respondent.

NO.

11-2-02773-4

ORDER

THIS MATTER having come on for hearing upon the application of the Plaintiff/Petitioner
 Defendant/Respondent agreement of the parties, and the Court being fully advised in the
premises, it is now, therefore hereby

ORDERED that UPON DEFENDANTS MOTION

TO DISMISS, THE COURT HAVING REVIEWED

THE PLEADINGS AND ARGUMENTS THE

COURT AUTHORIZES TRANSFER TO THE PROPER

VENUE WHICH IS KING COUNTY WASHINGTON

THE COURT LEAVES THE ISSUE OF TERMS, COSTS
AND SANCTIONS TO THE KING Co. COURT AND SANCTIONS
ARE ASSESSED AS TO THE VENUE ISSUE.

DONE IN OPEN COURT this 29 day of June, 2012.



Pat Mulvihill

Print Name:
Attorney for Plaintiff/Petitioner Defendant
WSBA # _____



JUDGE/COURT COMMISSIONER

Colleen Edwards
Print Name: Colleen Edwards
Attorney for Defendant/Respondent Plaintiff
WSBA # Do Se Per Plaintiff

33

STATE OF WASHINGTON
COURT OF APPEALS, DIVISION 1

Colleen Edwards, Appellant)	Case No. 721933
Vs.)	
Patrick Mulvihill, Respondant)	Declaration of Mailing

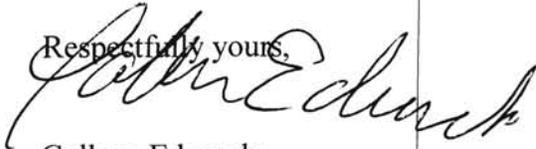
I, Colleen Edwards have sent the following documents to the following parties by first class mail.

APPELLANT'S BREIF and Appendix Documents

TO: Court of Appeals, Divison 1
TO: Mr. Patrick Mulvihill, Vashon, WA

Date: January 8, 2014

Respectfully yours,



Colleen Edwards
3377 Bethel Road SE, Ste 107, PMB 129
Port Orchard WA 98356
360 710 3889
email: springshowers5@gmail.com