

FILED
SUPREME COURT
STATE OF WASHINGTON
10/1/2019 4:48 PM
BY SUSAN L. CARLSON
CLERK

No. 97468-3

IN THE SUPREME COURT FOR THE STATE OF WASHINGTON

CHRISTOPHER GUEST and SUZANNE GUEST, husband and wife,

Plaintiffs, Defendants/Appellants

v.

DAVID LANGE and KAREN LANGE, husband and wife and the marital
community comprised thereof,

Defendants/Counterclaimants/Appellees

THE COE FAMILY TRUST and Trustee Michael Coe,
Intervenors,

v.

CHRISTOPHER GUEST and SUZANNE GUEST, husband and wife,
Appellees/Respondents

GUESTS' JOINT AND COMBINED RESPONSE AND ANSWER
TO LANGE AND KELLER ROHRBACK LAW FIRM'S
MOTION TO STRIKE WITHOUT WAIVER

Suzanne Guest
Christopher Guest
6833 Main Sail Lane
Gig Harbor, Washington 98335
P: (253) 495-1244
F: (877) 335-9686
E: emmalg@aol.com

The Guests, without any Guest waiver of any kind, respond to and answer the Lange and the Keller Rohrback LLP (“Keller”) law firm and Keller law firm partners Irene Hecht (“Hecht”) and Maureen Falecki (“Falecki”) ‘Motion to Strike’ the Guests’ joint and combined, and Guest martial community, Reply to the alleged Lange and Keller law firm Petition Answer in sole reliance on RAP 13.4(d) as follows.

The non-existent ‘Coe Family Trust and non-existent ‘Trustee’ Michael Coe who was not in fact a ‘Trustee’ of the ‘Coe Family Trust’ as Guest v. Lange intervenors and the ‘Trust’ related parties did not file a motion to strike the Guests’ Reply.

In January 2014, ‘Trust’ attorney Patrick McKenna admitted to the Guests and also to then Guest retained attorney David Cottnair at the Pierce County superior court as part of a Guest v. Lange et al. legal proceeding during an attorney conference that the ‘Coe Family Trust’ did not exist in 2004 when the alleged but non-existent ‘Trust’ purportedly ‘sold’ Spinnaker Ridge development subdivision Gig Harbor (“SRD” or “SR”) Lot 5 to the Guests, and that Michael Coe was not a ‘Trust’ trustee nor were there any ‘Trust’ co-trustees or any ‘Trust’ ‘successor’ trustees. [Appendix A].

The Guests under the June 1, 2016 Guest Deed of Trust contract (a true and correct copy of the recorded Guest Deed of Trust is attached to the

Guests' Guest v. Lange et al. Amended Petition for Review as Appendix Exhibit D 46-65 previously filed herein, and also as an Appendix Exhibit to the Guest Guest v. Lange et al. Court of Appeals Motion for Reconsideration) also identify that the McFerran law firm as the Guest Deed of Trust Trustee and the Guests' Deed of Trust lender have vested intervening constitutional, statutory, property, contract, Lange December 6, 2011 "retroactive" permit, LUPA, due process and contract rights in the overdue immediate removal of the April 2011 Lange constructed deck that sits and/or exists on any part of Spinnaker Ridge development subdivision Lot 5, 6833 Main Sail Lane, a "fixture", a structure and a chattel that exists on SR Lot 5 and therefore 'belongs' to Lot 5.

As evidenced by the December 6, 2011 "retroactive" Lange, 6801 Main Sail Lane, Pierce County tax parcel #7837000040, final not timely appealed City of Gig Harbor [CP 4517] LUPA Lange stipulated mandatory Lot 5 deck removal permit condition , including any and all deck footings and any support structures on SR Lot 5, that are "outside of the lot lines of parcel #7837000040", 6801 Main Sail Lane, submitted to the Court of Appeals in 2019 as part of the Guests' Motion for Reconsideration Appendix (D67) and to this Court as part of the Guests' Amended Petition for Review Appendix Exhibit D 45 with clerk's paper numbers. The documents submitted to the Court of Appeals in an Appendix are part of the

record. A copy of those two Appendix December 6, 2011 documents are attached as Appendix B to this Response/Answer for the Court's convenience (one is annotated by Guest in the Appendix).

The Deed of Trust Trustee and the Guests' Deed of Trust lender were not and are not Guest v. Lange et al. (referred to below for convenience and judicial economy as Guest v. Lange) parties. They are not bound by any and, accordingly, are not bound by any superior court order, decision, ruling, or 'judgment', or with respect by any Court of Appeals opinion or order. The Tacoma McFerran law firm is the June 1, 2016 Guest Deed of Trust Trustee. Under the June 1, 2016 Deed of Trust, the Guests transferred title to SR Lot 5 and any and all fixtures, structures and/or chattels on any part of Lot 5 to the Trustee. Those fixtures and structures include the deck structure that the Langes constructed on part of Lot 5 in April 2011 over the Guests' known objections when the Guests were out of state.

This joint and combined Guest Response/Answer is without any waiver of any Guest motion to strike the Lange and the Keller law firm's September 6, 2019 Answer brief with the exception of their embedded Answer admissions and concessions in the Guests' favor, any Guest motion to strike the 'Trust' alleged Answer, and any other Guest motions.

A. RELIEF REQUESTED

The Guests respectfully request that the Court deny the Langes' motion to strike. The Guests will address their right to the Langes' and the Langes' insurers' open-ended full defense, full release, full indemnity, full payment and full satisfaction of any court Guest 'order to pay', any court 'judgment' and/or any court injunction by separate motion(s) under the 1987 recorded ESM, Inc. 'patio or deck' easement defense, release, full indemnity, payment and satisfaction covenants and contracts that the Langes adopted and assumed as their own binding them to the Guests.

It is important to note that there is \$13,000 in Guest 'Trust' and Lange RAP 18.1(b)(1) and (b)(2) cash stay and supersedeas still on deposit with the Pierce County Superior Court Clerk in this matter. This case is not yet final. Ten thousand (\$10,000) of the stay and supersedeas cash stays and supersedes any enforcement of any Guest v. Lange order, ruling, decision, judgment, injunction, act or opinion. Three thousand (\$3,000) stays and supersedes enforcement of any Guest v. Lange et al. 'Trust' related order, ruling, decision, 'judgment' or opinion in this not yet final CR 54 (b) multi-party, multi-Guest claim and multi-Lange and 'Trust' related parties (and others') liability to the Guests. [See CP 415-416 March 27, 2017 Notice of Appeal text (for example) asserting that the current Guest cash supersedeas still on deposit with the Pierce County Superior Court

Clerk stays any enforcement or execution of the order appealed applicable to other remand orders].

B. STATEMENT OF MATERIAL MOTION FACTS

RAP 13.4(d) in pertinent part states and provides that a party may file a reply to an Answer to a petition for review only if the answering party seeks review of issues not raised in the petition for review.

As the Langes admitted and conceded in their amended petition Answer at pages 8 and 9, the Guests did not raise any specific issue with regard to the lis pendens in their Amended Petition for Review. The Guests preserved below on remand in the Guests' objections, oppositions and briefing and declarations that this case was governed by the mandates of chapter 36.70C RCW and chapter 58.17 RCW, that the case was not final, and that the Guests were in fact the successful parties. For example, see remand CP 226-236, CP 387-394 and CP 399-412.

The Langes and the Keller law firm raised the lis pendens issue in their Answer, the Guests did not. The Langes argued that the case was over, the Court of Appeals mandates were final, and that the Guests [allegedly] could not 'revisit' "the final Judgment". As the Guests pointed out in their Reply at pages 8 and 9 in particular, no lis pendens could be cancelled under the August 2, 2016 Guest v. Lange et al. published Court of Appeals opinion until all issues, all Guest claims, all Guest affirmative

defenses which were not stricken or dismissed, and all Lange, 'Trust' parties and others' liabilities are fully and finally adjudicated (not conceding that all of the documents that the Langes sought to 'cancel' were lis pendens or within the Guest v. Lange superior court's jurisdiction) in any event.

The Langes also ignored that under RAP 2.5(a) that the Guests were entitled to raise a trial court's lack of jurisdiction on any ground for the first time on appeal along with other specified issues. As identified in RAP 2.5, a party may question an appellate court's jurisdiction at any time.

In this instance, given the December 6, 2011 final City of Gig Harbor "retroactive" LUPA land use decision that the Langes stipulated to in December 2011 and did not appeal, challenge, dispute or attempt to alter, amend or change within 21 days after issuance by filing a timely or compliant LUPA Petition in December 2011 with the Pierce County Superior Court, or even any attempt to exhaust available administrative remedies on a timely basis such as requesting that the City alter, revise or amend the permit before the 21 day LUPA filing deadline had passed, as the Guests asserted the already final December 2011 with the Lange stipulated immediate mandatory removal of all portions of the already constructed deck on part of Lot 5 was final and could not be changed.

The Langes and Lange attorney William Lynn wrongly, falsely and repeatedly asserted throughout the Guest v. Lange case that the December

6, 2011 Lange “retroactive” permit was put “on hold” with the certain LUPA knowledge as a veteran real property, LUPA, permit and development attorney that once the 21 day LUPA period to appeal, challenge or attempt to alter a final local legislative body land use decision had passed – as it had - that nothing could be done. The December 6, 2011 permit was final, could not be altered, changed, amended and particularly because it was a retroactive permit, the construction already complete requiring mandatory removal of part of the deck, the permit could not be ‘put on hold’.

By the end of December 2011, retroactive to April 2011 (and before) the Guests already had a vested constitutional, statutory, contract, property, due process, personal, indemnity, covenant and common law rights in the December 6, 2011 permit and the Langes’ stipulation that they would immediately remove any part of the April 2011 constructed deck from all parts of SR Lot 5 including any and all footings and any support systems.

Bill Lynn’s then ‘secret’ from the Guests - and from the courts – June 2012 emails to and from Angela Belbeck (now Summerfield) requesting that the City “revise” an already final LUPA permit “outside of the appeal process” with the knowledge that the not appealed or challenged permit stipulated to by the Langes mandated and required that the Langes immediately remove the deck from Lot 5 in December 2011 was illegitimate

and illegal. [Appendix F, D 199- 203[204] attached hereto annotated by Guest as Motion Answer Appendix C].

The Langes and their attorneys deliberately delayed justice in this – and in the related Spinnaker Ridge case – and in doing so not only deceived the Guests but also the courts including all appellate courts. As above, the Pierce County Superior Court in this instance with a final Lange December 2011 City “retroactive” - not appealed - LUPA land use permit in reality sat as an appellate court. The Langes and Lange counsel deceived the superior court as an appellate court. In December 2011 and forward, in reality the only ‘jurisdiction’ that the superior court could exercise as an appellate court was to strike and dismiss the Langes’ untimely 2012 answer, affirmative defense and counterclaims with prejudice and enter judgment in the Guests’ favor, enforce the already final Lange LUPA permit, and exercise its general trial court jurisdiction to enter fees, costs, expenses, damages and compensation to the Guests.

In this Court’s recent Church Of The Divine Earth opinion, the Church timely challenged and requested that the City of Tacoma remove permit conditions that the Church objected to before the permit became final, not seven or more months later when it was too late. Under LUPA, the Langes and their attorneys were barred from litigating the terms, conditions, mandates and Lange permit stipulations. It was obvious, as

evidenced by a Guest v. Lange juror's question to David Lange whether the Langes had a permit to construct their April 2011 deck that the trial court refused to ask that it was important to the jury if the Langes had obtained a deck permit. [CP 4568].

The Langes' deceit and "unclean hands" wasted years of court time, a week of a twelve jury trial now undone, and consumed enormous resources. The 'Trust' parties and counsel's deceit in an attempt to alter the Guests' title to Lot 5 and their 'unclean hands' not only wasted court time but also consumed enormous Guest legal time, the Guests' life and financial resources.

The Langes were represented by attorneys at all times from at least April 2011 throughout this litigation and on appeal at no cost or expense to the Langes.

Although the Guests raised recusal and the trial court's lack of jurisdiction below and on remand, any ground or facts resulting in a trial court's lack of jurisdiction. These grounds include, but are not limited to, recusal – in this instance recusal as evidenced by the Guest v. Lange et al. and Spinnaker Ridge v. Guest et al. endorsed court filings that Judge Culpepper recused himself in both matters and cases involving the Guests.

The Langes inaccurately asserted in their Answer at pages 9 and 10, among other grounds for filing a Reply, that the Guests only asserted RAP

13.4(b)(1) and (2) grounds for review. That is not correct. The Guests asserted all grounds for review.

If the Court does not accept review, the Langes, the 'Trust' parties' and their attorneys will escape accountability.

There are other grounds for filing a Reply. The grounds identified above are material grounds. The Court should deny the Lange Motion to strike. As above, the 'Trust' parties' did not file a motion to strike.

The 'Trust' parties should be held to account. All issues regarding the non-existent 'Trust' are not exhausted as asserted by 'Trust' counsel in their September 6, 2019 Answer in this not yet final CR 54(b) case and matter.

C. ARGUMENT AND AUTHORITIES

See above. In addition, the majority of the cases cited by Lange counsel in their Answer support the Guests, a Guest Reply and an award of fees, costs, expense, interest, damages and compensation to the Guests, authorities that the Guests will use in Guest Lange and Trust related motions. These opinions include, but are not limited to, the Northlake Marine Works opinion regarding unconstitutional municipal owned and/or controlled private corporations and the 1991 American Legion Post No. 32 v. City of Walla Walla, Washington Supreme Court tax case involving what

makes a tax unconstitutional (in the case involving Pierce County and its ownership of Spinnaker Ridge development subdivision land).

D. CONCLUSION

The Guests respectfully request that the Court deny the Langes' motion and allow the Guest Reply.

Respectfully submitted this 1st day of October, 2019.

/s/ Suzanne Guest
Suzanne Guest
Guest Marital Community

/s/ Christopher Guest
Christopher Guest

Certificate of Service
to be filed by separate document

APPENDIX

EXHIBIT A

DECLARATION OF SUZANNE GUEST

I, Suzanne Guest, declare and testify under penalty of the perjury laws of the State of Washington that the following facts, statements, events and circumstances are true and correct and that I have personal knowledge of the same.

1. I am over the age of eighteen and am competent to testify in any court.

2. I have personal knowledge of the following declarations, facts, statements, admissions events and circumstances outlined below.

3. In January 2014, the non-existent 'Coe Family Trust', non-existent 'Trustee' Michael Coe and the 'Trust' related parties' attorney Patrick McKenna admitted to me and to Christopher my husband and then Guest v. Lange et al. attorney David Cottnair that the 'Trust' did not exist in 2004 when Christopher and I purportedly purchase SR Lot 5 from the 'Trust' and its non-existent 'Trustees' and/or alleged 'successor' or 'co-

trustees' none of whom existed as attorney Patrick McKenna admitted to us a the Pierce County Superior Court as part of an attorney conference.

4. Despite demands to notify the court that the 'Trust' did not exist in 2004 or at any time thereafter, attorney McKenna did not do so.

Subscribed to and sworn to by me under penalty of the laws of perjury of the State of Washington on this 1st day of October, 2019 at Gig Harbor, Washington as true and correct.



APPENDIX

EXHIBIT B



FILE COPY

COMMUNITY DEVELOPMENT DEPARTMENT

December 6, 2011

David & Karen Lange
6801 Mainsail Lane
Gig Harbor, WA 98335

Re: Building Permit #BD-11-0231, 6801 Mainsail Lane, Deck

Dear Sirs,

Thank you for your recent submittals for a building permit for project referenced above. Your submittals have been reviewed for compliance with Chapter 15 of the Gig Harbor Municipal Code and have been found to be in general conformance. Based on this review, your permit is approved pursuant to the following stipulations:

1. All work must be in conformance with all federal, state and local regulations;
2. Approved submittal documents must be on site at all times during construction;
3. Any alterations to the approved plans must be submitted and approved prior to construction;
4. Approved plans contain red lined comments, which shall be considered as part of the approved plans including: All portions of the deck located outside of the defined "Patio and Deck Easement" record #8704290509 and/or outside of the lot lines of parcel #7837000040 shall be removed including any footing and support structure;
5. Review all "Construction Tip Sheets" provided for code compliance;
6. Issuance of a Certificate of Occupancy is required prior to any occupancy.

Approval of plans or permits should not be construed as approval of any violation of federal, state or local laws. The City of Gig Harbor does not review plans for compliance with the federal Americans with Disabilities Act.

Thank you for your cooperation. We look forward to assisting in making your project a success.

Sincerely,
The City of Gig Harbor

Paul Rice
Deputy Building Official/Fire Marshal
3510 Grandview Street
Gig Harbor, WA 98335
(253) 851-6170
(253) 854-6408 fax
ricep@cityofgigharbor.net

CHANGES MUST BE APPROVED
BY CITY OF GIG HARBOR PRIOR
TO CONSTRUCTION.

Cc: Dick J. Bower- Director
File

CP 4510

PD 000055

045



FILE COPY

COMMUNITY DEVELOPMENT DEPARTMENT

December 6, 2011

David & Karen Lange
6801 Mainsail Lane
Gig Harbor, WA 98335

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Sincerely,
The City of Gig Harbor

Paul Rice
Deputy Building Official/Fire Marshal
3510 Grandview Street
Gig Harbor, WA 98335
(253) 851-6170
(253) 854-6408 fax
ricep@cityofgigharbor.net

CHANGES MUST BE APPROVED
BY CITY OF GIG HARBOR PRIOR
TO CONSTRUCTION.

Cc: Dick J. Bower- Director
File

CP 4517

PD 000055

D67

APPENDIX

EXHIBIT C

From: Molly Towslee <TowsleeM@cityofgigharbor.net>

To: emma1g <emma1g@aol.com>

Subject: Public Records Request July 25,

Date: Mon, Aug 20, 2018 11:03 am

Attachments: LangeAnswerAffirmDefCounterclaim.pdf (821K), LangeGigHarbor12-6-11ltr.pdf (62K)

Ms. Guest,

Thank you for pointing out that the 2 of the 4 emails on the exemption log were released in a prior release in 2017. While those e-mails were asserted as attorney-client privileged, the City was not aware they had been previously released, as they should have been withheld in the prior production. Because they were earlier released, the City is providing the e-mails again attached both to this email and they have been included in the folder you were sent the link.

In addition, the three emails from our attorney, also attached to this correspondence, were not included in the release to you. I've included these in the folder with your other records as well

Ms. Summerfield sent them to me to be included, but they were not copied over to your folder. That is part of my confusion to your responses, as I thought they had already been provided.

I hope that this provides you with all the information that you have requested. If you find something else, please let me know and I'll do my best to provide you the record.

Sincerely,

Molly Towslee, City Clerk

253.853-7613 Direct Line

Disclaimer: Public documents and records are available to the public as required under the Washington State Public Records Act (RCW 42.56). The information contained in all correspondence with a government entity may be disclosable to third party requesters under the Public Records Act.

Attached Message

From Lynn, Bill <BLynn@gth-law.com>
To Angela G. Summerfield <asummerfield@omwlaw.com>
Subject RE: Lange Answer and City of GH Letter (12-6-11)
Date Thu, 7 Jun 2012 23:37:46 +0000

I appreciate that. Have a good weekend.

William T. Lynn

Attorney at Law

T 253 620 6416

F 253 620 6565

From: Angela S. Belbeck [<mailto:abelbeck@omwlaw.com>]

Sent: Thursday, June 07, 2012 4:30 PM

To: Lynn, Bill

D200

Subject Lange - Gig Harbor deck building permit

Date Tue, 12 Jun 2012 21:32:00 +0000

Hi Bill. I had a chance to go over your request with the Interim Building Official, Paul Rice. Because the letter issued in December was based on the survey provided by your client, the requirement to remove the encroaching portion is appropriate. On the other hand, the City acknowledges the underlying portion of property is presently the subject of dispute in Pierce County Superior Court. That being the case, the City is willing to place the building permit on hold until entry of a court order resolving the matter. If your client would like to stop the 180-day clock on the building permit, please submit your request directly to the Building Official. The permit may then be placed on hold (eliminating the need to pay a fee for permit extensions while the matter is pending resolution), and upon resolution of the matter the clock would resume on the remaining time on the permit.

I hope this will be helpful to your client. Let me know if you have any questions.

Best regards,

Angela

Angela S. Belbeck | Attorney

Ogden Murphy Wallace P.L.L.C.

1601 Fifth Ave., Suite 2100 Seattle, WA 98101

phone: 206.447.2250 | fax: 206.447.0215

abelbeck@omwlaw.com

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Attached Message

From Lynn, Bill <BLynn@gth-law.com>

To Angela G. Summerfield <asummerfield@omwlaw.com>

Subject FW: Lange Answer and City of GH Letter (12-6-11)

Date Thu, 7 Jun 2012 23:20:34 +0000

This is maybe the simplest way to do this. The counterclaim sets forth the facts. The Langes replaced the deck in its original configuration. That included a part that extends outside the easement over the adjacent lot. But, as the counterclaim asserts, the CCRs expressly allow that to remain. Long story short, there is a sound legal basis for their claim that they have the right to retain the deck. The permit--other document attached--states the "encroaching" part of the deck has to be removed. That would include the part that has been there since it was first built. I don't think the City should impose that requirement. The City is essentially deciding a civil/property ownership issue. I think the language regarding the disputed area should be deleted or modified to let ownership and the right to maintain be determined by the Court. I am happy to discuss. Thank you.

William T. Lynn

Attorney at Law

T 253 620 6416

D202

F 253 620 6565

From: Ostruske, Frances
Sent: Thursday, June 07, 2012 3:45 PM
To: Lynn, Bill
Subject: Lange Answer and City of GH Letter (12-6-11)

Frances Ostruske

GORDON THOMAS HONEYWELL

Tacoma Office
 1201 Pacific Avenue, Suite 2100
 Tacoma, Washington 98402
<http://www.gth-law.com>
 T 253 620 6439
 F 253 620 6565
fostruske@gth-law.com

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Attached Message

From: Rice, Paul <IMCEAEX-
 _O=Law+20Enforcement+20Support+20Agency_OU=LESA_cn=Recipients_cn=ricep@namprd09.prod.outlook.com>
 To: 'Angela S. Belbeck' <abelbeck@omwlaw.com>
 Cc: Richards, Dennis <RichardsD@cityofgigharbor.net>
 Subject: RE: CONFIDENTIAL ATTORNEY CLIENT FW: Lange Answer and City of GH Letter (12-6-11)
 Date: Fri, 8 Jun 2012 00:26:31 +0000

Angela,

I can absolutely meet on Monday. Both parties have insistently tried to draw the City into their dispute. We have consistently said over and over it is a civil matter. When they both came in with independent surveys showing the exact same easements and lot lines there was (I thought) a mutual understanding that the alleged encroaching portion of the deck would be removed so we issued the building permit with that provision. Apparently the winds have shifted, see you at 2:30 on Monday.

Best regards,

Paul

From: Angela S. Belbeck [<mailto:abelbeck@omwlaw.com>]
Sent: Thursday, June 07, 2012 4:47 PM
To: Rice, Paul
Cc: Richards, Dennis
Subject: CONFIDENTIAL ATTORNEY CLIENT FW: Lange Answer and City of GH Letter (12-6-11)

Hi Paul. Are you available Monday afternoon to discuss the attached? The Langes, outside of the appeal

D203

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↗

→ [process, are asking for a revision (see cut and paste email immediately below)] I need to see the plans and visualize the ownership issues to see if their request has merit. We don't want the city to decide private property ownership issues as alleged, but it may be that the city appropriately restricted the deck based on ownership on record. As of right now I can meet from 2:30 on. Let me know if that would work for you and if it doesn't, perhaps I could just take a look at the permit file then we can follow up by telephone. Thanks!

[cut and paste from e-mail from B. Lynn to me 6/7/12 at 3:05 pm]

[I was hoping to talk with you and the staff about the deck building permit issue we chatted about earlier]
 [-----where there is a permit issued but with a note saying part of it has to be removed because it is on disputed property. There is a lawsuit on the ownership issue. Maybe the permit could just say the status of the deck on that part will be determined after the ownership issue is resolved? Please call when you can. Thanks]

From: Lynn, Bill [mailto:BLynn@gth-law.com]
Sent: Thursday, June 07, 2012 4:21 PM
To: Angela S. Belbeck
Subject: FW: Lange Answer and City of GH Letter (12-6-11)

[This is maybe the simplest way to do this.] The counterclaim sets forth the facts. The Langes replaced the deck in its original configuration. That included a part that extends outside the easement over the adjacent lot. But, as the counterclaim asserts, the CCRs expressly allow that to remain. Long story short, there is a sound legal basis for their claim that they have the right to retain the deck. The permit—other document attached—states the “encroaching” part of the deck has to be removed. That would include the part that has been there since it was first built. I don't think the City should impose that requirement. The City is essentially deciding a civil/property ownership issue. I think the language regarding the disputed area should be deleted or modified to let ownership and the right to maintain be determined by the Court. I am happy to discuss. Thank you.] →

William T. Lynn
 Attorney at Law
 T 253 620 6416
 F 253 620 6565

From: Ostruske, Frances
Sent: Thursday, June 07, 2012 3:45 PM
To: Lynn, Bill
Subject: Lange Answer and City of GH Letter (12-6-11)

Frances Ostruske

GORDON THOMAS HONEYWELL

Tacoma Office
 1201 Pacific Avenue, Suite 2100
 Tacoma, Washington 98402
<http://www.gth-law.com>
 T 253 620 6439
 F 253 620 6565
fostruske@gth-law.com

D203

October 01, 2019 - 4:48 PM

Transmittal Information

Filed with Court: Supreme Court
Appellate Court Case Number: 97468-3
Appellate Court Case Title: Christopher and Suzanne Guest v. David and Karen Lange
Superior Court Case Number: 11-2-16364-0

The following documents have been uploaded:

- 974683_Answer_Reply_20191001164606SC377718_4307.pdf
This File Contains:
Answer/Reply - Answer to Motion
The Original File Name was Answer.pdf

A copy of the uploaded files will be sent to:

- bgillaspy@gillaspvrhode.com
- ihecht@kellerrohrback.com
- mfalecki@kellerrohrback.com
- pmckenna@gillaspvrhode.com
- sanderson@gillaspvrhode.com
- sandrew@gth-law.com
- timothy.farley@thehartford.com
- wlynn@gth-law.com

Comments:

Sender Name: Suzanne Guest - Email: emma1g@aol.com
Address:
6833 Main Sail Lane
Gig Harbor, WA, 98335
Phone: (253) 495-1244

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