
Washington State Court of Appeals
Division I



Docket No. 68472-8

Snohomish Cy. Sup. Ct. Cause No. 10-2-10660-8

WILLIAM TWITCHELL, et ux.,

Plaintiffs-Petitioners,

-against-

MARY ANN B. KERRIGAN,

Defendant-Respondent.

APPELLANTS' REPLY BRIEF

ORIGINAL

ADAM P. KARP, ESQ.
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The Twitchells, through counsel Adam P. Karp, reply to Defendant's response to their opening appeal brief.

I. REBUTTAL STATEMENT OF THE CASE

First, for no apparent purpose except to vex and insult, Defendant insists upon misspelling the Twitchells' dog's name as "Too Little" though the Twitchells have, in every pleading, referred to her as "Two Little."

Second, Defendant continues to blame NWB Construction and Snohomish County, yet on Sept. 21, 2011, the trial court struck her affirmative defense that any other nonparty bore responsibility. CP __ [Exh. A, subj. (Order Striking Affirmative Defense)].¹

Third, even before suit was filed, Defendant has been largely itinerant, absent from her home, which is situated directly adjacent to the Twitchells, her dogs living in her motor home or even outside Snohomish County. Thus, there may be nothing for the Court to abate come time of judgment. Indeed, on Sept. 29, 2011, the Defendant unsuccessfully urged the trial court to reconsider its order granting the Twitchells' motion to compel discovery (specifically seeking, *inter alia*, her and her dogs' whereabouts).

¹ A *Supplemental Designation of Clerk's Papers* referencing this pleading is filed contemporaneously with this brief.

CP __ [Exh. B, subj. (*Kerrigan Decl. Supporting Motion for Recon.*)]².

She admits:

Because the County, after receiving the petition from the Plaintiffs, refused to renew my private kennel license, I cannot, and do not, currently keep my dogs at that house. Further, due to the County's actions, I am not keeping my dogs in Snohomish County. As the dogs are not on the property or even in the County, I do not see the need for the Plaintiffs to have information about the places that myself and my dogs are staying.

Id., at ¶ 6. In asking the court to lift the \$1500 sanction award, she adds, “my house (the one next door to the Plaintiffs’ house) is currently in foreclosure.”

Id., at ¶ 8.

II. REBUTTAL ARGUMENT

The Twitchells incorporate by reference here the arguments from their *Opening Brief* (“O.B.”), but add:

A. Warrant of Abatement

At page 4, Defendant contends that the Twitchells’ complaint seeks “judgment” for “a writ of abatement of nuisance.” However, RCW 7.48.020 renders this specific relief (i.e., warrant issued as part of judgment based on allegations contained within complaint) unattainable as a matter of law since RCW 7.48.020 expressly restricts issuance of the warrant for abatement on two conditions precedent – *first*, entry of judgment for damages, followed

² Also to be found in the *Supplemental Designation*.

by, *second*, a successful motion proving post-judgment grounds for relief (viz., that the nuisance has not “ceased” or that the monetary judgment does not have sufficient deterrent effect to prevent its “resumption”). And because the warrant may only issue *post*-judgment, the arbitrator, judge, or jury would not even be authorized to issue same as part of the original action since its findings and conclusions alone would not suffice for issuance as a matter of law.

Furthermore, the lag between filing suit and judgment entry can take over a year, by which time the nuisance may have abated by the mere force of litigation and monetary judgment. As noted above, the Twitchells may enjoy a *de facto* abatement by the time judgment is rendered, obviating any RCW 7.48.020 motion.

Thus, while a warrant of abatement is no doubt injunctive in nature, it, much like a lawsuit against a government entity subject to the *ante litem* claim-noticing requirements of Ch. 4.92 RCW, cannot be sought until after judgment has been rendered. In other words, a *pre*-judgment warrant of abatement would be dismissed automatically as unripe per RCW 7.48.020.³

Nothing in *Grundy v. Thurston Cy.*, 155 Wn.2d 1, 7 (2005) disturbs this plain logic for two reasons. *First*, Grundy only sued for abatement, not money damages. *Id.*, at 8, fn. 6 (“[S]he does not seek anything but the

³ Of course, nothing prevents a party from also seeking a prejudgment TRO under CR 65 or a prejudgment preliminary injunction. The Twitchells, however, sought neither.

abatement of the nuisance, namely, the removal of the heightened portion of the sea wall.”). *Second, Grundy* never even addressed the mechanics of issuing such a warrant given the procedural posture of the case where the trial court dismissed her action on summary judgment (i.e., pre-trial).

To rule in favor of Defendant would require this Court to adopt the bright-line rule that failure to pray for a warrant of abatement in the *Complaint* bars Plaintiff from motioning the Court for same after entry of judgment for money damages per RCW 7.48.020. Conversely, such a rule would hold that merely putting the Defendant on notice that Plaintiff may elect to so move the Court renders the case nonarbitrable at the outset.⁴ If the Court rejects this rule, one urged implicitly by the Defendant without citing *any* authority in its support, then the Court must reverse.

In doing so, the Court would properly construe the Legislature’s intent in passing RCW 7.48.020 as providing to the nuisance plaintiff an additional remedy to the traditional devices of postjudgment execution. Judgment creditors may attempt to satisfy judgments through postjudgment execution (Ch. 6.17 RCW), garnishment (Ch. 6.27 RCW), depositions and interrogatories (RCW 6.32.010-.15), as well as supplemental proceedings (Ch. 6.32 RCW) that include freedom-infringing orders to appear, possibility

⁴ Remember that the Twitchells expressly offered to withdraw this request from the Prayer, provided they were not estopped from seeking the warrant by post-judgment motion. *See Appellants’ Opening Brief*, at 14 and CP 9:18-22.

of arrest, and order to furnish bond to assure debtor's appearance (RCW 6.32.010), and possibility to pay money directly to the sheriff (RCW 6.32.080). The court may also issue an injunction restraining any person, including the debtor, from transferring or interfering with the debtor's property. RCW 6.32.120. In this context, by enacting RCW 7.48.020, the Legislature provided a certain class of judgment creditors, i.e., those suffering statutory nuisance, the right to seek postjudgment, injunctive relief in the form of a warrant of abatement where other postjudgment remedies failed to satisfy. *See* RCW 7.48.020 ("in addition to the execution to enforce the [judgment], on motion, have an order allowing a warrant to issue ...").

No statute or rule requires a plaintiff to include a provision for postjudgment relief in the form of Title 6 RCW devices, including supplemental proceedings, postjudgment depositions and interrogatories, or postjudgment injunctive restraints, much less prove same in the original action. Such logic extends to the postjudgment enforcement device of the warrant of abatement for money judgment predicated on nuisance.

Like *Mercier*, the Twitchells seek a money judgment against Defendant for the death of Two Little and years of nuisance behavior, among other tort claims. They do not seek a TRO, preliminary injunction, or permanent injunction, nor do they seek a declaratory judgment, as part of the original action. Like the arbitrator in *Mercier*, the arbitrator in this matter

will only be tasked with entering money judgment. It is here that Defendant states her first “additional reason,” at 7, that the Legislature did not design the MAR program to permit injunctive relief to “flow from proceedings [not] fully under the control and oversight of an elected judge as opposed to an arbitration conducted by an unelected lawyer.” *Resp. Brief*, at 8.

Defendant, however, ignores completely that the arbitrator will not, under any circumstance, have the authority to issue a warrant of abatement. Only an elected judge will make that determination. She also ignores the well-settled position that arbitrators have nearly plenary authority to decide the case before them, no differently than an elected judge. *Mercier* makes this clear:

According to M. Wayne Blair, author of a chapter on RCW 7.06 in a State Bar Association Deskbook, arbitrators who conduct mandatory arbitrations should construe their authority broadly. When issues in the case are left undecided in the arbitration, they must be referred back to the court and this undermines the objectives of the system:

The authority of an arbitrator begins at the point the arbitrator is assigned to a case. Under MAR 3.2, the arbitrator has authority to decide all procedural issues, examine any site or object relevant to the case, issue subpoenas, administer oaths, rule on evidence, determine the facts, decide the law, make an award and generally perform acts authorized by the statute and rules.

The rules should be interpreted by the arbitrator as a broad grant of authority. An arbitrator should hesitate before deciding that he or she does not have authority to make a particular ruling or decide a matter. If an

arbitrator so determines, then the matter must be referred to the court. Such uncertainty on the part of the **380 arbitrator only adds to the time and expense of resolving a case.[^{FN15}]

FN15. Deskbook at 2–26 (emphasis added).

Mercier, 139 Wash.App. at 900 (emphasis in original).

And if Defendant contends that the MAR process would interfere with her right to a jury trial to determine whether to abate a nuisance, this position assumes abatement is jury-triable to begin with – and it is not. *See City of Bellingham v. Chin*, 98 Wash.App. 60, 71-72 (I, 1999) (finding no right to jury trial where action is not purely legal in nature; generally, suit for an injunction is equitable proceeding). Besides, nothing prevents Defendant from requesting a trial *de novo* should the arbitrator decide against her. And requiring a nonjudicial determination prior to jury trial does not violate the U.S. Constitution’s Seventh Amendment right to trial by jury so long as the right of appeal to a court for jury trial remains inviolate, which our MAR system does. *Christie-Lambert Van & Storage Co., Inc. v. McLeod*, 39 Wash.App. 298 (I, 1984).

Whatever steps the Twitchells may take post-judgment, so long as they each limit their claims to \$50,000, RCW 7.06.020 and MAR 1.2 mandate that their claims be arbitrated. As for the three “additional reasons”

stated by Defendant at 7, the Twitchells anticipated them in their opening brief, as follows:

- *Second reason* (at 9), addressed by *O.B.*, Section III(B)(3) [pp. 14-15].
- *Third reason* (at 9), addressed by *O.B.*, Section III(B)(4) [pp. 15-16].
- *Fourth reason* (at 10), addressed by *O.B.*, Section III(B)(5) [pp. 16-18].

B. \$50,000 Per Claim

First, the best Defendant can offer to overcome *Christensen* is to have this Court ignore it as an out-of-division decision. Though from Division II, it still binds this Court, as there is only one Court of Appeals:

The Washington State Court of Appeals was created by a constitutional amendment approved by voters in 1968. Laws of 1969, State Measures, Amend. 50, at 2975 (codified as Const. art. IV, § 30). The amendment provided in part that “[t]he number, manner of election, compensation, terms of office, removal and retirement of judges of the court of appeals shall be as provided by statute.” Const. art. IV, § 30(4). Pursuant to this provision, chapter 2.06 RCW established a single Court of Appeals with three divisions. RCW 2.06.010, .020.

Eugster v. State, 171 Wn.2d 839, 841 (2011)(en banc)(emphasized). Washington’s legislature “established a court of appeals” in 1969 as this state’s intermediate appellate court. RCW 2.06.010 (emphasis added). A “division” of the “court of appeals” is just that—a subpart of the same court. RCW 2.06.010(5). By statute, published decisions of Washington’s sole “court of appeals” have “precedential value.” RCW 2.06.040. As

such, all three “divisions” of Washington’s Court of Appeals are within the same jurisdiction: Washington.

Second, Defendant applies an unnecessarily expansive interpretation of “claim” as synonymous with “cause of action” to argue that the Twitchells’ position (one they have not taken in actuality) “could lead to the unreasonable result of an MAR proceeding with potential damages of up to \$1,000,000. (10 claims x 2 plaintiffs = 20 x \$50,000).” *Resp. Brief*, at 12. The Court should reject this foray into unconventional wisdom for the precedential reason a Defendant may always move the trial court to look behind the face of the pleadings to determine whether the claims will exceed, in aggregate, the \$50,000 threshold, allowing that alternative theories of proof of damage may lead to a single sum of special and general damages, per *Fernandes v. Mockridge*, 75 Wash.App. 207 (I, 1994); the factual reason that the Twitchells have agreed to cap each of their damages at \$50,000, not \$500,000; and the legal reason that the Court need not examine Defendant’s \$1,000,000 calculation to adjudicate the issues in this appeal, where the Twitchells are asserting a \$50,000 per party, not \$50,000 per claim of each party, rule consistent with the *Christensen* holding.

Third, Defendant cites no authority to support a spousal merger rule – whether by party or by claim. The Court should reject the argument for the

straightforward reason that Mr. and Mrs. Twitchell are not “unserved”⁵ by operation of marriage or their personal injuries conjoined as if they were Siamese twins. That Mrs. Twitchell has claimed medical specials of her own, while Mr. Twitchell has not, illustrates this distinction. Nuisance may cause recoverable general damages to husband and wife. The Court should reject Defendant’s attempt to achieve a windfall based on a spousal merger rule.

Dated this May 18, 2012

ANIMAL LAW OFFICES

Digitally signed by Adam P.

Karp

Location: Bellingham, WA

Date: 2012.05.18 18:32:44

36700

Adam P. Karp, WSB No. 28622

Attorney for Appellants

⁵ Literally, their selves obliterated, thereby legally stripped of standing or personhood.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on May 18, 2012, after 5 p.m., I caused a true and correct copy of the foregoing, to be served upon the following person(s) in the following manner:

[x] Email (stipulated)

Greg Worden
Barrett & Worden
gworden@barrett-worden.com



Adam P. Karp, WSBA No. 28622
Attorney for Plaintiffs-Petitioners

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**IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON
IN AND FOR THE COUNTY OF SNOHOMISH**

WILLIAM AND DEBORAH TWITCHELL,

Plaintiffs,

vs.

MARY ANN B. KERRIGAN;

Defendant.

Case No.: 10-2-10660-8

ORDER STRIKING AFFIRMATIVE DEFENSE

Clerk's Action Required

ORDER

This matter came before the court on Plaintiffs' motion to strike Defendant's Ch. 4.22 RCW comparative fault claim against the County. Based on the pleadings filed herein, the court finds good cause to order the following:

- 1. Plaintiffs' motion is GRANTED.
- 2. Affirmative defense (Para. 32) is STRICKEN WITH PREJUDICE.
- 3. Other:

Dated this Sept. 21, 2011.

ORDER STRIKING AFFIRMATIVE DEFENSE - 1

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Superior Court Judge

Presented by:

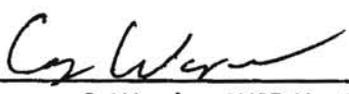
ANIMAL LAW OFFICES

/s/ Adam P. Karp


Adam P. Karp, WSBA No. 28622
Attorney for Plaintiffs

Approved as to form only:

BARRETT WORDEN


Gregory S. Worden, WSB No. 24262
Attorney for Defendant

**ORDER STRIKING AFFIRMATIVE
DEFENSE - 2**

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B

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6 **THE SUPERIOR COURT OF THE STATE OF WASHINGTON**
IN AND FOR THE COUNTY OF SNOHOMISH

7 WILLIAM and DEBORAH TWITCHELL,

8 Plaintiffs,

9 v.

10 MARY ANN B. KERRIGAN,

11 Defendant.

NO: 10-2-10660-8

**DECLARATION OF MARY ANN
KERRIGAN IN SUPPORT OF MOTION
FOR RECONSIDERATION**

12
13
14 I, Mary Ann Kerrigan, am over the age of 18, and am competent to testify in this matter.
15 This declaration is based upon my personal knowledge. Under penalty of perjury under the laws
16 of the State of Washington, I declare and state as follows:

17 1. I am the defendant in this lawsuit, and I am providing this declaration to support
18 my request that the Court reconsider its denial of my protective order, reconsider granting
19 Plaintiffs' motion to compel, and reconsider the award of sanctions to Plaintiffs. While I reiterate
20 my request for the all the relief sought in the motion for protective order, I am most concerned
21 with this Court's denial of my request that Plaintiffs be prohibited from obtaining discovery
22 regarding information about locations, other than the subject property, where I or my dogs may
23 be currently staying.
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1 2. I was very distressed to learn that information about my whereabouts and the
2 whereabouts of my dogs were not protected from discovery. I am very anxious and distressed
3 regarding the prospects of the Plaintiffs and, through them, the County having knowledge of my
4 whereabouts. Discussed below are the facts behind that distress. And those facts provide good
5 reasons for the Court to reconsider – particularly as to my whereabouts.

6 3. It was not brought to the Court's attention in my initial motion that, in the past, I
7 have been the victim of a violent crime where a man raped me and held a knife to my throat and
8 cut my face and neck. He also tied my hands behind my back. I thought I was going to die. The
9 police never found him. That event has made me very fearful and anxious. For example, I am not
10 comfortable being out at night without one of my dogs. Given that background, when there have
11 threats by the Plaintiffs to shoot me and shoot my dogs, I am very concerned with those threats
12 and do not want Plaintiffs knowing my whereabouts.

13 4. The prospect of the current whereabouts of myself and my dogs being known also
14 causes me great distress because the County's actions have convinced me that the County is
15 seeking the whereabouts of my dogs in order to seize and euthanize them. As I described in my
16 initial declaration, in the past County employees have suggested I turn in my dogs, in the
17 administrative proceedings the County unsuccessfully sought information about my whereabouts
18 and the hearing officer held that I did not have to provide such information, and Officer Barber
19 has asked an acquaintance for information about me and my dogs. Given the County's past
20 actions towards me, I believe that if the County learns of my whereabouts, the County will seek
21 to impound and ultimately euthanize my dogs, including my service dog.

22 5. I have a disability. In particular, I have a screw in my left knee and I cannot walk
23 well. I have a current handicapped parking permit. Due to this disability, I have a service dog,
24
25

1 Mr. Tee. Mr. Tee has been individually trained to do work and perform tasks regarding my
2 disability, including helping me get up, helping me get out of bed, helping me get out of chairs,
3 keeping me steady, and helping with my night movement (I had eye surgery that impacted my
4 night vision), and looking out for me. As described in my earlier declaration, the County already
5 has once seized my service dog. In addition, although I paid the County the license fee for my
6 service dog and all dogs, the County closed my dogs' licenses. Attached as exhibit 1 to this
7 declaration is a document my attorney recently got from Snohomish County showing the closure
8 of those licenses. As a person with a disability, I am very concerned that allowing discovery of
9 information regarding my whereabouts would lead to the County attempting to seize my service
10 dog. The County's closure of those licenses suggests to me that the County is attempting to
11 create a situation where it could use the lack of licenses as a pretext to seize my dogs. Given that
12 there is a law against interfering with the use of a service dog, I believe the County's actions
13 toward me and my dogs are improper and discriminatory against me, and I request this Court to
14 protect me from providing further information that could be used by the County.

16 6. I have no regular home beside my house that is next door to the Plaintiffs' house.
17 Because the County, after receiving the petition from the Plaintiffs, refused to renew my private
18 kennel license, I cannot, and do not, currently keep my dogs at that house. Further, due to the
19 County's actions, I am not keeping my dogs in Snohomish County. As the dogs are not on the
20 property or even in the County, I do not see the need for the Plaintiffs to have information about
21 the places that myself and my dogs are staying.

23 7. Also, I ask that the Court reconsider the \$1,500 in sanctions imposed against me. I
24 believe that it is very critical to the safety and well being of myself and my dogs to seek
25 limitations on what information the Plaintiffs may get, and that I had, and have, good reason for

1 resisting the discovery sought by Plaintiffs. Payment of the sanctions imposed will create
2 significant hardship for me. As discussed above, I have a disability that currently prevents me
3 from working as a nurse, and that leaves me on a fixed income. I have expenses related to the
4 care of my dogs, and my house (the one next door to the Plaintiffs' house) is currently in
5 foreclosure.

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7 8. Finally, I want to make the Court aware of the great importance I place on my
8 request for a protective order. I regret that my dogs killed the Plaintiffs' dog. But, I also want to
9 let the Court know how that incident has devastated my life. I cannot keep my dogs at my
10 residence as my kennel license was not renewed. I have had to take my dogs out of the County. I
11 live in fear that the Twitchells will work with the County to seize my dogs. I live in fear
12 regarding the safety of myself and my dogs. My property has been invaded and vandalized. I ask
13 that the Court take those circumstances into account and reconsider the decision to substantially
14 deny my protective order and to grant Plaintiffs' motion to compel.

15 *I declare under penalty of perjury under the laws of the State of Washington that the*
16 *foregoing is true and correct.*

17 DATED THIS 29th day of September, 2011 in Seattle, Washington.

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20 
21 MARY ANN KERRIGAN
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EXHIBIT 1

CLOSE PET LICENSE

Authorized user is: Ute Padilla of SC Auditor LICENSING

8/9/2011 3:05:22 PM

[Pet/Kennel Main Menu](#)

Owner data will appear after entering license number and clicking the Submit button

License Closed

Cur License 1104072 Date Closed 08/09/2011

Comments KENNEL DENIED

Owner KERRIGAN, MARY-ANN

Pet Name MR. TEE

Mail Address 10121 EVERGREEN WAY #25-2

City EVERETT

State WA

Zip 98204

Check to CLOSE License



Snohomish County, Online Government Information & Services

425-388-3411 or 1-800-562-4367, TTY 425-388-3700
Snohomish County, 3000 Rockefeller Ave., Everett, WA 98201

10-973049

CLOSE PET LICENSE

Authorized user is: Ute Padilla of SC Auditor LICENSING

8/9/2011 3:05:56 PM

[Pet/Kennel Main Menu](#)

Owner data will appear after entering license number and clicking the Submit button

License Closed

Curr License 1104033 Date Closed 08/09/2011

Comments KENNEL DENIED

Owner | KERRIGAN, MARY-ANN Pet Name | REBA

Mail Address | 10121 EVERGREEN WAY #25-2

City | EVERETT State | WA Zip | 98204

Check to CLOSE License



Snohomish County, Online Government Information & Services

425-388-3411 or 1-800-562-4367, TTY 425-388-3700
Snohomish County, 3000 Rockefeller Ave., Everett, WA 98201

CLOSE PET LICENSE

Authorized user is: Ute Padilla of SC Auditor LICENSING

8/9/2011 3:06:40 PM

[Pet/Kennel Main Menu](#)

Owner data will appear after entering license number and clicking the Submit button

License Closed

Curr License 1104034 Date Closed 08/09/2011

Comments KENNEL DENIED

Owner KERRIGAN, MARY-ANN Pet Name ZAA

Mail Address 10121 EVERGREEN WAY #25-2

City EVERETT State WA Zip 98204

Check to CLOSE License



Snohomish County, Online Government Information & Services

425-388-3411 or 1-800-562-4367, TTY 425-388-3700
Snohomish County, 3000 Rockefeller Ave., Everett, WA 98201

CLOSE PET LICENSE

Authorized user is: Ute Padilla of SC Auditor LICENSING

8/9/2011 3:07:08 PM

[Pet/Kennel Main Menu](#)

Owner data will appear after entering license number and clicking the Submit button

License Closed

Curr License 1104035 Date Closed 08/09/2011

Comments KENNEL DENIED

Owner Pet Name

Mail Address

City State Zip

Check to CLOSE License



Snohomish County, Online Government Information & Services

425-388-3411 or 1-800-562-4367, TTY 425-388-3700
Snohomish County, 3000 Rockefeller Ave., Everett, WA 98201

CLOSE PET LICENSE

Authorized user is: Ute Padilla of SC Auditor LICENSING

8/9/2011 3:07:39 PM

[Pet/Kennel Main Menu](#)

Owner data will appear after entering license number and clicking the Submit button

License Closed

Curr License 1104036 Date Closed 08/09/2011

Comments KENNEL DENIED

Owner | KERRIGAN, MARY-ANN Pet Name | QUACK

Mail Address 10121 EVERGREEN WY #25-214

City EVERETT State WA Zip 98204

Check to CLOSE License



Snohomish County, Online Government Information & Services

425-388-3411 or 1-800-562-4367, TTY 425-388-3700
Snohomish County, 3000 Rockefeller Ave., Everett, WA 98201

CLOSE PET LICENSE

Authorized user is: Ute Padilla of SC Auditor LICENSING

8/9/2011 3:08:08 PM

[Pet/Kennel Main Menu](#)

Owner data will appear after entering license number and clicking the Submit button

License Closed

Curr License 1104037 Date Closed 08/09/2011

Comments KENNEL DENIED

Owner KERRIGAN, MARY-ANN

Pet Name BUNNY

Mail Address 10121 EVERGREEN WY #25-21

City EVERETT

State WA

Zip 98208

Check to CLOSE License



Snohomish County, Online Government Information & Services

425-388-3411 or 1-800-562-4367, TTY 425-388-3700
Snohomish County, 3000 Rockefeller Ave., Everett, WA 98201