

92484-8

Appellate Court #. 72397-9
Superior Court #. 13-2-40091-0-KNT

SUPREME COURT OF WASHINGTON STATE

WAYNE R. RICHARDSON

Appellant,

vs.

COAST REAL ESTATESERVICIES, ET. ALL

Respondents.

FILED
END 13 2015
CLERK OF THE SUPREME COURT
STATE OF WASHINGTON

cy

PETITION FOR REVIEW TO SUPREME COURT
RAP 13.4(b)(1), (2), (4) "WITH ARGUMENT." RAP 13.4(c)(7).

Wayne R. Richardson
P.O. Box 78618
Seattle, WA 98178-0618

2015 OCT -9 AM 11:21
COURT OF APPEALS DIV
STATE OF WASHINGTON

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ORIGINAL

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No.	King Co. Special rules	Page	No.	RPC rules	page
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A. IDENTITY OF PETITIONER

I, Wayne R. Richardson, appellant Pro Se, asks this court to accept review of the Court of Appeals Division I affirming respondent's Order of Summary Judgment without making findings of fact for their legality to maintain subject matter jurisdiction without making answer to the plaintiff's original claim required under CR 7(a), CR 8 and CR 12(b)(6) as designated in Part B of this petition.

B. APPELLANT COURT DECISION

PLAINTIFF'S ANALYSIS OF COURT FINDING OF FACTS

QUESTIONS OF LAW UNDER RAP 2.5(a) - (b)(3)

1. The reasoning of Lau, J. on page one of the opinion to affirm was based on untenable grounds.
2. Page 2 under "**Facts**", line 6 state "Richardson failed to serve Coast with original process" is in error of the filed declaration of service.
3. Page 2 lines 10 -13 "Defendants objected, arguing lack of jurisdiction, ineffective service and other innuendos associated with KCLCR 7: but states "Plaintiff's Motion for Temporary Injunction was denied without prejudice." But was later denied on March 7 following a hearing.
4. The rest of the findings is set forth without confirming Judge Bowman was available to rule on said actions of the defendant's that are moot to this cause of action.

5. The footnote #3 cite (Orwick v. City of Seattle, 103 Wn.2d 249, 256, 692 P.2d 793 (1984) claiming it is not the function of appellate courts to do counsel's thinking and briefing.").

FINDINGS OF FACT OF COURT DECISION

1. The claims and writing is not consistent with the new revised version of RAP and Superior Court Rules. In reality, the findings of the Appellate Court Division I is still trying to incorporate old case law with the new revised statutes that incorporate the full RESTATEMENT SECOND TORT ACT § 7.6 accepted by the Supreme Court in 2014. (See RAP 2.2(a)(13), (b)(1), (b)(6)(D)(d) adopted September 1, 2014.

2. The first sentence under FACTS states:

"Between February 2007 and early 2014, Wayne Richardson was a tenant in the Greentree Apartments, an apartment complex managed by Coast Real Estate Services."

The above statement is not true as written. There was no Coast Real Estate Services associated with Greentree Apartments until on or about December of 2010 when Walston became landlord of Greentree Apartments. The former landlord "Dick's Property Management" of the City of Renton controlled that property until after a government financed facelift was partially completed in 2008. The government contractor was

fired for failing to complete the required Federal pickups for finishing the inside apartments to a new standard. Some were partially worked on but never bought off by the Federal Inspector or the King County building inspectors. Apartment J 181, petitioner's apartment, was one effected. After Walston became landlord for Greentree in 2011, one complex caught fire in the attic and displaced 16 different apartments in that complex.

2. The above statement is made to correct the Appellant Courts first sentence. Item 2 under questions of law has already been answered. (See page 8 of appellant's answer brief *Powers v. WB Mobile Services Inc.* 177 Wn. App. 208 (Oct. 2013) @ 213: RCW 4.16.170).

ARGUMENT

The gravamen to this claim is based entirely on defendant's refusal to answer the original claim within the 20 days allowed by the summons. (See *Cost Mgmt Servs. v. Lakewood* pages 3-4 @ App. Ans. Brief) The appellate ruling certifies service of process was maintained on Walston and Coast on November 25, 2013; then counters the first statement that Coast was not served original process. There are no references to any

court papers set forth by the respondent's brief to affirm the accusations set forth in their brief. The main court paper that is missing is the one confirming their answer to the claim and the date of any said answer required under CR 4 in the Summons and CR 7(a). Petitioner's First Brief cites CR 7(a) on pages 1, 3, 5, 7, 12 but was ignored by the Appellate Court under acts of prejudice against indigent Pro Se parties. Further, the opinion was intended to be written without being published; that means it could not be addressed in any other court as a precedent to future cases or having the effect of the law of this case. RAP 2.5(c).

DECISION ON SUMMARY JUDGMENT

Page 4 of the decision on service of motion for summary judgment, states, at lines 6-16, was timely served including the added three days required for mailing under CR 4, RAP 18.6(b) and CR 5(2)(A).

ARGUMENT

The writing statement of time for service by mailing is not a correct statement of the cited court rule. It does not contain the wording that the day of receipt of the mail does not enter into the computation of time of service until the day after receipt of the service. (See CR 4 rule on

Service of Summons) that excludes the day of receipt of document to be excluded from the computed time of service. RAP 18.6(b) states likewise, that the day of service must add 3 days to the day of deposit in the mail. The legal issue on the service of process of a Motion for Summary Judgment must include the 28 days **before the day of hearing**. The 28th day of this case came on the **day** of the defunct hearing. Had the Motion for Summary Judgment been placed in the mail on May 19, for proper service, the order would have been vitiated for failing to answer the original claim within the 20 days required by CR 4 of the Summons that was properly served to Walston on November 25, 2013. (See **COST MGMT SERVS. v. LAKEWOOD @ 652** in Appellant' Ans. Brief at page 3-4 and **SULVIAN v. PURVIX @) 459-460** in Appellant' First Brief @ page 10)

CONCLUSION

Issues presented to the Supreme Court

1. It is the appellant's well versed understanding that the Division I Appellate Court is prejudiced against any indignant pro se party that may bring any tort action against any tort-feasor for damages. Their claim of

"*Orwick v. City of Seattle*, 103 Wn.2d, 249, 256, 692 P.2d 793 (1984) is not concurrent with *Discipline of Carmick* 146 Wn.2d 582, 48 P.3d 311 (June 2002). Carmick demands by RPC 3.3(f) and 3.5(b) that a client with counsel in opposition to a person without counsel, must inform the court of any and all known information of his client whether detrimental to his client or not; inform the court of the detrimental issues so the court may make a ruling based on "legal" advise of the issues involved. It further assigns several Rules of Professional Conduct that may be used in a court of law against that apposing attorney for refusing to comply with the Rules of Professional Conduct. (See Appellant's Answer Brief @ P.13).

2. The respondents moved for a continuance to file their response brief claiming there was an error in the address of some paper petitioner placed in the court record but did not include a certified copy from the clerk of the court to verify their bogus claim required under ER 409. The appellant filed an answer to respondent's brief in the Appeals Court dated Dec. 8, 2014. It states on page 2, the reason why it made no difference where the Motion for Notice of Summary Judgment was sent: the mailing date was one day off of the required 28 days notice; there was not going to

be an assigned judge to hear the motion, and the action was filed electronically by e mail to the clerk of the court in violation of KCLGR 30(5)(A)(iii) that requires all motions for hearings and trials to be paper filed with dates and signatures required under CR 11. Then the Court of Appeals Division I claimed it was not the courts function of trial or appellate courts to do counsel's thinking and briefing.

The appellant must bring the Appellate Court up to date that much water has flowed under the bridge since 1984. Court rules, statutes have been rewritten and in 2014 the FEDERAL RESTATEMENT SECOND TORT ACT § 7.6 was accepted into. **MORRIS v. PALOUSE RIVER R. R. 149 Wn. App. 366, 203 P.3d 1069 (Mar. 2009) @ 370**

"CR(60)(b)(5) permits relief from a final order upon showing '[t]he judgment is void.' "Proper service of the summons and complaint is essential to invoke personal Jurisdiction." *In re Marriage of Markowski*, 50 Wn. App. 633, 635-36. 794 P.2d 754 (1988)

"To be valid, service of process must comply with statutory requirements. *Thayer v. Edmonds*, 8 Wn. App. 36, 40, 503 P.2d 1110 (1972).

The Court of Appeals granted appellant's service of process to Jeanetta Walston under CP 1-27. Coast was personally named in both the Summons and Complaint. Service was complete on November 25, 2013.

POWERS v. WB MOBILE SERVS., INC. 177 Wn. App. 208 (Oct. 2013) @ 213

¶12 "In *Sidis v. Brodie/Dohrmann, Inc.*, 117 Wn.2d 325, 329, 815 P.2d 781 all defendants. The *Sidis* court disapproved of language in *North Street Ass'n v.* (1991) (quoting RCW 4.16.170, our Supreme Court read the phrase "[o]ne or more of the defendants'" from this statute unambiguously to require that only one of the defendants need be served within the 90-day period to toll the statute of limitations against *City of Olympia*, 96 Wn.2d 359, 635 P.2d 721 (1981), to the extent that *North Street Ass'n* interpreted RCW 4.16.170 to require a petitioner to serve all necessary parties within the 90 day period. *Sidis*, 117 Wn.2d at 331-32. Further, the *Sidis* court noted in dictum that although the issue off unnamed defendants was not before it.

Respondents assert there is no valid reason to distinguish between named defendants for purposes of the tolling statute. That issue is not, however, part of this case. . . . We note, however, that in some cases, if identified with reason-able particularity, "John Doe" defendants may be appropriately "named" for purposes of RCW 4.16.170.

@ 215

¶18 With our decision that Power's claim against W.B. Mobile was timely under RCW 4.16.170, we do not reach the separate question whether the amended complaint related back to the date of the initial complaint under CR 15(c).

¶19 We reverse and remand for trial on the merits.

3. Petitioner's First Brief attachments are cited in the

Appendix on page -ii-. Item 2 states "Court Docket 2 pages A-3, A-4.

The court take notice that the document attached to the brief is a direct copy of the registered court docket on file for the filing of court papers.

The little boxes next to the dates of entry to the court are all defendant's entries into the case by e mail in violation of KCLGR 30(5)(A)(iii) that states all documents associated with any Motion or Trial shall be filed in paper form. (See King County Emergency Rule Amendment KCLGR 30 attached to petitioner's first brief that the appellate court ignored for jurisdictional ruling on how the summary judgment was entered into the case that consists of intrinsic acts of fraud under CR 60(b)(4), (5).

ADDED DAMAGES AND SANCTIONS TO APPELLANT

The original complaint listed damages including payments made before the apartment was available for move-in and costs of overcharging that was regulated by HUD and King County rental authority for certain size apartments. From August 2005 through December 1, 2013 at \$100,665.00 +Court Costs \$1,055.00 =\$101,720.00. Costs after service of process to answer respondent's frivolous actions after refusing to answer the claim. Respondent counsel Michael T. Callan WSBA # 16237 is charged for submitting 19 e mail documents for hearings and dispositions of motions entered by plaintiff without notice to plaintiff, placing a lock on the case from public view and altering plaintiff's computer of motions

submitted for hearings by Judge Bill Bowman. One such Order Denying Plaintiff's Motion for Discovery Order is attached to this Petition for Review. It gives no date when the order was signed and the signature was white out by Judge Bowman but rubber stamped over the white out by Callan. (See exhibit "A-1" 2 pages attached) Therefore, plaintiff Wayne R. Richardson asks for sanctions under RAP 18.9 for induced intrinsic fraud under CR 11 and 60(b)(1), (4). The appellant states with specificity that a minimum charge of \$7,000.00 for each entry without answer to the claim within the 20 days demanded under CR 4 be set forth against each e mail used by the defendant to dispose of motions entered by the plaintiff. Said total added costs associated with this case is 19 charges of filing false documents to a court without having obtained subject matter jurisdiction over the cause of action or personal jurisdiction over the plaintiff is $\$7,000.00 \times 19 \text{ e mail filings} = \$133,000.00 + \$101,720.00$. This does not cover the damages associated with Black Mold that affected the plaintiff's health for over eight years and took three animals owned by the plaintiff to an early death. The appellant asks this court to honor the sanctions and damages above under RAP 2.5(a)(2) and vacate the Summary Judgment.

I, Wayne R. Richardson plaintiff/appellant depose and state the forgoing document was written by me to be true and correct to the best of my knowledge.

Signed by appellant Wayne R. Richardson Pro Se

Wayne R. Richardson ^{Aug. 8, 2015}
Wayne R. Richardson Pro Se plaintiff

Attachments:

1. EX "A-1" 2 pages. Order Denying Plaintiff's Motion for Discovery.
2. Copy of the Appellate Court ruling dated Aug. 3, 2015.
3. Copy of denial of appellant's Motion for Reconsideration.
4. Copy of appellant's Motion for Reconsideration.

*Takes Order This order was filed electronically
Bowman blanked his name
after plaintiff objected to the
"Motion for Discovery"
Sub 28*

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IN THE SUPERIOR COURT OF WASHINGTON
IN AND FOR KING COUNTY

WAYNE R. RICHARDSON,

Plaintiff,

No. 13-2-40091-0 KNT

v.

ORDER DENYING PLAINTIFF'S
MOTION FOR DISCOVERY ORDER

COAST REAL ESTATE SERVICES FOR
GREENTREE APARMENTS IN KING
COUNTY, JEANETTA WALSTON (manager),

(Proposed)

Defendants.

This Matter, having come before the Court on Plaintiff's Motion/Discovery Under CR 26 and the Court, having reviewed pleadings and files herein and being otherwise fully advised in the premises it is hereby:

ORDERED, ADJUDGED AND DECREED that Plaintiff's Motion/Discovery Under CR 26 is hereby Denied. It is further

ORDERED, ADJUDGED AND DECREED that in the event Plaintiff files any further motions or actions in this matter that fail to comply with the Civil Rules and King County

Exhibit "A-1" Page 1 of 2



1 Superior Court Local Rules, the Court will impose sanctions in a form and amount to be
2 determined by the Court.

3 DONE IN OPEN COURT THIS _____ DAY OF MARCH, 2014.
4

5 BILL A. BOWMAN

6 _____
HONORABLE BILL BOWMAN _____
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8 Presented by:

9 /s/ Michael T. Callan

10 Michael T. Callan, WSBA # 16237

11 Attorneys for Defendants
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IN THE COURT OF APPEALS OF THE STATE OF WASHINGTON

COAST REAL ESTATE SERVICES)
FOR GREENTREE APARTMENTS IN)
KING COUNTY, JEANETTA WALSTON)
(manager),)
Respondent,)
v.)
WAYNE R. RICHARDSON,)
Appellant.)
_____)

NO. 72397-9-1

DIVISION ONE

UNPUBLISHED OPINION

FILED: August 3, 2015

FILED
COURT OF APPEALS OF
STATE OF WASHINGTON
2015 AUG -3 AM 11:10

LAU, J. — Wayne Richardson appeals an order denying his CR 60 motion to vacate following the trial court’s order granting summary judgment of dismissal to Coast Real Estate Services. He argues the trial court erred in denying the motion and that it erred by treating the motion as a motion to reconsider rather than a motion to vacate. Because the trial court properly granted summary judgment to Coast Real Estate Services and properly denied the motion to reconsider/vacate, we affirm.

FACTS

Between February 2007 and early 2014, Wayne Richardson was a tenant in the Greentree Apartments, an apartment complex managed by Coast Real Estate Services.

On November 25, 2013, Richardson, representing himself, sued Coast Real Estate Services and Greentree Apartments Community Manager Jeanetta Walston (collectively, "Defendants") under RCW 59.18, alleging various defects with his apartment.¹ Clerk's Papers (CP) at 1-17. Richardson failed to serve Coast with original process. On December 19, Richardson filed a motion for default and a motion for a temporary injunction against Defendants. Richardson's injunction motion sought to prevent Defendants from renting his unit or any other unit in his building until certain defects were fixed. Defendants objected, arguing lack of jurisdiction, improper service, and that the pleadings failed to comply with King County Local Civil Rule 7 (KCLCR) governing motions practice. On December 27, the trial court struck Richardson's motion for default for failing to comply with KCLCR 7. The court also denied Richardson's motion for a temporary injunction without prejudice.

On January 17, 2014, Richardson re-noted his motion for a temporary injunction. Defendants again objected on the basis of lack of service but also argued Richardson failed to show the elements necessary for a temporary injunction. On March 7, the trial court again denied Richardson's motion following a hearing.

On March 21, Richardson filed a motion for discovery and provided two new addresses for service of future pleadings—a post office box in Seattle and a

¹ Richardson never notified the Defendants about the alleged defects as required by the lease before he filed his lawsuit. He also stopped paying rent.

campground in Kent, Washington. On May 20, Defendants filed a motion for summary judgment arguing that Richardson's failure to pay rent under RCW 59.18.080 bars his lawsuit.² A hearing on the motion was noted for June 20. Defendants sent the motion to both addresses Richardson provided in his motion for discovery. Richardson never filed any response to Defendants' motion. Defendants filed a reply on June 16 confirming they had not received any response from Richardson. On June 27, the trial court granted defendant's motion for summary judgment, noting that Richardson failed to file a response and failed to appear at the summary judgment hearing.

On July 21, Richardson filed a motion to vacate order of defendant's summary judgment. The trial court treated Richardson's motion as a motion for reconsideration and denied the motion. Richardson appeals.

ANALYSIS

Standard of Review

We review an order granting summary judgment de novo, considering whether "there is no genuine issue as to any material fact and . . . the moving party is entitled to a judgment as a matter of law." CR 56(c); see Ranger Ins. Co. v. Pierce County, 164 Wn.2d 545, 552, 192 P.3d 886 (2008).

A trial court's denial of a motion to reconsider or a motion to vacate is reviewed for an abuse of discretion. Singleton v. Naegeli Reporting Corp., 142 Wn. App. 598, 175 P.3d 594 (2008); State v. A.N.W. Seed Corp., 44 Wn. App. 604, 607, 722 P.2d 815

² The Residential Landlord-Tenant Act, ch. 59.18 RCW, provides that a tenant "shall be current" in rent and utility payments "before exercising any remedies" under the act. When the motion was filed, Richardson was in arrears on rent in the amount of \$2,170 and had vacated the apartment following an unlawful detainer action.

(1986). "A trial court abuses its discretion if its decision is manifestly unreasonable or based on untenable grounds or untenable reasons." In re Marriage of Littlefield, 133 Wn.2d 39, 46-47, 940 P.2d 1362 (1997).

Summary Judgment

Richardson argues that the trial court erred when it denied his motion to vacate the order granting summary judgment to Defendants. Because Richardson was timely served with Defendants' summary judgment motion and failed to respond, summary judgment was proper.

The record shows that Richardson was timely served with Defendants' motion for summary judgment. CR 56(c) requires a party moving for summary judgment to serve the motion "not later than 28 calendar days before the hearing." CR 5(2)(A) states that when a party elects to serve by mail, such service is "complete upon the third day following the day upon which [relevant documents] are placed in the mail" CR 5(2)(A). Because Defendants mailed their motion for summary judgment and related materials on May 20, service was complete on May 23, 28 days before the scheduled hearing on June 20.

Further, the record shows that Defendants mailed their summary judgment motion to both addresses Richardson provided. On a motion submitted March 24, Richardson noted two addresses at which he could receive service. Richardson admitted that he mistyped one of these addresses. But Richardson never notified the trial court about this error, despite his duty to keep the court and counsel informed of his correct address. CR 13(e); see also Edwards v. Le Duc, 157 Wn. App. 455, 460, 238 P.3d 1187 (2010) (A trial court must hold pro se parties to the same standards to which

it holds attorneys). In any event, Defendants mailed the summary judgment pleadings to both addresses, and nothing in the record indicates the other address Richardson provided was invalid for purposes of mail service.

Because Richardson failed to respond after receiving sufficient service, summary judgment was proper. See Davies v. Holy Family Hosp., 144 Wn. App. 483, 499-500, 183 P.3d 283 (2008); see also Weatherbee v. Gustafson, 64 Wn. App. 128, 131, 822 P.2d 1257 (1992) (“The granting of summary judgment is proper if the nonmoving party, after the motion is made, fails to establish any facts which would support an essential element of its claim.”).

Motion to Vacate or Reconsider

Richardson contends that the trial court erred by denying his motion to vacate and that the trial court erred by treating his motion as a motion to reconsider. But whether Richardson’s motion was properly considered as a motion to reconsider or a motion to vacate is irrelevant because we conclude he fails under either standard. First, for the reasons discussed above, the trial court properly granted Defendants’ motion for summary judgment. Under the circumstances here, the trial court did not abuse its discretion when it treated Richardson’s motion under the more generous reconsideration standard. See Wagner Dev. Inc., v. Fidelity & Deposit Co. of Maryland, 95 Wn. App. 896, 906, 977 P.2d 639 (1999).

But even if we treat the motion as a motion to vacate, Richardson’s failure to submit a supporting affidavit or declaration defeats the motion. CR 60(e) provides that a party seeking vacation of a final order must support his motion to vacate with an affidavit setting forth a set of facts upon which the motion is based. CR 60(e). Because

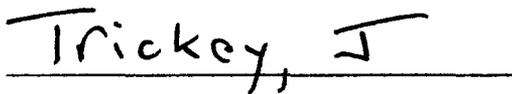
Richardson failed to provide a supporting affidavit or declaration, the trial court did not abuse its discretion when it denied Richardson's motion. See Gustafson v. Gustafson, 54 Wn. App. 66, 70, 772 P.2d 1031 (1989) (A trial court's decision on a motion to vacate "will not be reversed in the absence of a manifest abuse of that discretion."); see also Davidson Serles & Assocs. v. City of Kirkland, 159 Wn. App. 616, 624, 246 P.3d 822 (2011) ("On summary judgment review, we may affirm the trial court's decision on any basis within the record.").³

CONCLUSION

For the reasons discussed above, we affirm.

A handwritten signature in cursive script, appearing to read "Jan J.", written over a horizontal line.

WE CONCUR:

A handwritten signature in cursive script, appearing to read "Trickey, J.", written over a horizontal line.A handwritten signature in cursive script, appearing to read "Applewick, J.", written over a horizontal line.

³ We note that Richardson, pro se appellant, includes many confusing and irrelevant arguments in his briefing. We find these arguments unpersuasive and do not consider them. See Orwick v. City of Seattle, 103 Wn.2d 249, 256, 692 P.2d 793 (1984) ("It is not the function of trial or appellate courts to do counsel's thinking and briefing.").

The Court of Appeals
of the
State of Washington

RICHARD D. JOHNSON,

DIVISION I
One Union Square
600 University Street
Seattle, WA

September 10, 2015

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Wayne R. Richardson
P.O. Box 78618
Seattle, WA 98178

CASE #: 72397-9-1

Wayne R. Richardson, Appellant v. Coast Realestate Services, Respondent

Counsel:

Enclosed please find a copy of the order denying motion for reconsideration entered in the above case.

Within 30 days after the order is filed, the opinion of the Court of Appeals will become final unless, in accordance with RAP 13.4, counsel files a petition for review in this court. The content of a petition should contain a "direct and concise statement of the reason why review should be accepted under one or more of the tests established in [RAP 13.4](b), with argument." RAP 13.4(c)(7).

Page 1 of 2

Page 2 of 2

Case No. 72397-9-I, Richardson v. Coast Real Estate

September 10, 2015

In the event a petition for review is filed, opposing counsel may file with the Clerk of the Supreme Court an answer to the petition within 30 days after the petition is served.

Sincerely,

A handwritten signature in black ink, appearing to read "R.D. Johnson", with a long horizontal flourish extending to the right.

Richard D. Johnson
Court Administrator/Clerk

emp

Enclosure

c: The Honorable Bill A. Bowman

2015 SEP 10 AM 10:01

IN THE COURT OF APPEALS OF THE STATE OF WASHINGTON

COAST REAL ESTATE SERVICES)
FOR GREENTREE APARTMENTS IN)
KING COUNTY, JEANETTA WALSTON)
(manager),)

Respondent,)

v.)

WAYNE R. RICHARDSON,)

Appellant.)

NO. 72397-9-1

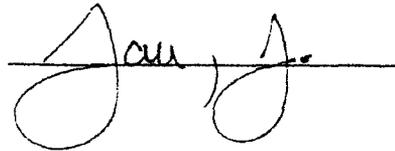
ORDER DENYING MOTION
FOR RECONSIDERATION

Appellant Wayne Richardson has filed a motion for reconsideration of the court's opinion filed on August 3, 2015. The panel has determined that the motion should be denied; therefore, it is

ORDERED that the motion for reconsideration is denied.

Dated this 10th day of September 2015.

FOR THE PANEL:



AUG 13 2015

Appellate Court #.72397-9-1
Superior Ct. #. 13-2-40091-0KNT

COURT OF APPEALS
DIVISION I
FOR WASHINGTON STATE

WAYNE R. RICHARDSON)

Appellant,)

vs.)

COAST (Real Estate Services))
ET ANO)

Respondents.)

MOTION FOR RECONSIDERATION
UNDER RAP 13.4(a)

The plaintiff received the court's affirmed ruling on this day August 5, 2015 at the P.O. Box set forth on the appeal. The writing meanders around from service of process to the summary judgment much the same as this court's ruling on "Harmless Error" back in 1969 that has been abolished by the Supreme Court in 2013. There are several errors set forth in this writing that the wording of the statute set forth for summary judgment and service of process fail to take credit of every word in the statute.

CONVOLUTED FINDINGS

MOTION FOR RECONSIDERATION 1 of 10

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MOTION FOR RECONSIDERATION -2-

1. The clerk of your court placed "Coast Real Estate Services" as an original plaintiff in this action along with Jeanetta Walston (manager). That is not the way the summons and claim were filed in the court under Bill Bowman for the assigned judge. Michael T. Callan, of Peterson Russell Kelly PLLC was not the instigator of an action to remove Richardson from the apartment. This statement is reinforced by your finding of facts on page 2, second ¶ first line that states "On November 25, 2013, Richardson, representing himself, sued Coast Real Estate Services and Greentree Apartments Community Manager Jeanetta Walston (collectively, "Defendants") under RCW 59.18" — (CP) at 1-17. Both appellant's briefs cite Wayne R. Richardson as appellant and Coast Real Estate Services ET AL as respondents. The Summons further verifies this title. The appellant now challenges this court to prove there was not another attorney involved in this action with an eviction notice served on the plaintiff Richardson in March 2014 by a different firm not being represented by PRK. There is no record of this second attorney verified in any of the court records associated with this cause of action. This is one reason why Walston wanted a waiting time to file their answer to Richardson's first brief. There was no answer to any issue made of record in Richardson's first brief that was answered by respondent's brief.

MOTION FOR RECONSIDERATION -2-

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MOTION FOR RECONSIDERATION -3-

2. Your third ¶ on page 4 states Richardson was timely served for summary judgment: stating service by mail required 28 days "before" the hearing date: claiming the documents were mailed on May 20 and service was complete on May 23. The 28 days counted must start on May 24, not May 23, by CR 4(a)(2). The day of receipt of service must **not** count into the time for counting the days "before". 28 plus 3 =31. The day of the hearing was to be on June 20; therefore June only had 19 days before the hearing. May 23 to May 31 is only 8 days. 8 plus 19 is only 27 days before the hearing. Regardless of this detail, there has been no ruling whether the defendants had ever gained subject matter jurisdiction or personal jurisdiction over the plaintiff. Without answer to the plaintiff's original claim, there is no jurisdiction available to the defendant. **COST MGMT SERVS. v. LAKEWOOD 178 Wn.2d 635 (Oct. 2013) @ 652. (See page 3-4 Appellant's Ans. Brief)** This court refused to comply with that finding even though it is explained with specificity on page 8 of the appellant's answer brief labeled "Defendant's purposeful delay for entire case". that "if service has not been had on the defendant prior to the filing of the complaint, the plaintiff shall cause one or more of the defendants to be served personally, or commence service by publication within ninety days from the filling of the complaint.

MOTION FOR RECONSIDERATION -3-

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MOTION FOR RECONSIDERATION -4-

3. This court does not deny that service of process on Walston was proper and legal on November 26, 2013 as was service on Coast. Coast is not listed as the landlord of Greentree apartments. The business is not the party who collects the rent. It is/was Jeanetta Walston. Further, there was never a document that was circulated to the patrons paying rent that there was a business connected with Jeanetta Walston that had an address where service could be made or how it was to be served. It is factual that the respondent's brief made no mention of the proper place to serve Coast. The best way to serve such a company is to serve the office where the directions are given to tenants by the landlord who collects the payments. That is exactly the way service of process was made by the process server. (See page 8 of Appellant's Answer Brief) Richardson had personal jurisdiction over the landlord from the start of this case.

JURISDICTION NOT A SUBJECT OF INTEREST WITH THIS COURT

COSTI MGMT. SERVS. v. LAKEWOOD on page 9 of Appellant's Answer Brief is tantamount to *Richardson v. Coast*. Whether Coast or Walston was first or second on the docket is immaterial as both parties were served at the same time and place by the same process server. Walston was the person who collected the money and distributed any documents about entry into the unit for examination.

MOTION FOR RECONSIDERATION -4-

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3 MOTION FOR RECONSIDERATION -5-

4 All complaints were made to Walston, not Coast. Coast was not cited in any
5 document produced by Walston. The respondents never made any statement that
6 the business "Coast" ever maintained a license with the State of Washington.
7

8 There was never a document presented to the renters that gave any information
9 for filing any claim to have something fixed in the apartment that stated Coast
10 was to be in charge of fixing the problem. All fixing of defects was taken strictly
11 to Walston. Coast is/was never the "landlord" for Greentree apartments.
12

13 Richardson stated this in the original complaint. Every business in Washington
14 State must have a Washington State tax number to comply with the Department of
15 Revenue. There is no mention by the respondent that any said record has ever
16 been established to establish the legality of Coast to operate a business in the State
17 of Washington. There are a lot of people renting houses and apartments who have
18 no tax record of earned income. Walston is one of them. That is one reason why
19 the plaintiff asked the Superior Court for a temporary injunction for discovery of
20 why there were no ledgers kept for the business of profit and loss. And this court
21 refused to read the appellant's answer brief. Further; this court is adamant that
22 they are not going to rule whether respondent's use of process for summary
23 judgment was legal or fraudulent.
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26 MOTION FOR RECONSIDERATION -5-
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MOTION FOR RECONSIDERATION -6-

1 This court found that Walston was served on November 25, 2013. This
2 court's foot note #1 on page 2 is convoluted stating "He also stopped paying rent."
3 that is not in concert with foot note # 2 on page 3 that states, "Richardson was in
4 arrears on rent in the amount of \$2,170 and had vacated the apartment following
5 an unlawful detainer action."
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ANALYSIS OF THESE STATEMENTS

10 Walston claims \$2,170.00 was owed for rent and interest but fails to state
11 how many months for what price totaled that amount. There is no mention or
12 showing of any contract signed by Richardson that might equal that amount.
13 Richardson had already charged Walston with extortion when service was made
14 on November 25, 2013. This court cited (CP 1-17) that Walston was served with
15 process on November 25, 2013. The wording of the two foot notes suggests that
16 Richardson had not made payment for the month of November of 2013 before the
17 service of process on Walston. Richardson is and has been a business owner for
18 over 48 years and has maintained a license for that business since June 25, 1967,
19 both Washington State and the Federal Government. He has a ledger of all the
20 checks and the amounts made to Walston and the date paid. A copy is attached to
21 this document. The ledger starts on January 5, 2013 check # 1474 for \$650.00.
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MOTION FOR RECONSIDERATION -6-

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MOTION FOR RECONSIDERATION -7-

OTHER CHECKS WRITTEN FOR 2013 TO Greentree

NO.	check #	Date	Paid to	Amount	The above check is not listed here.
2.	1338	2-5-13	Greentree	\$650.00	
3.	1349	3-4-13	Greentree	\$650.00	
4.	1360	4-5-13	Greentree	\$650.00	
5.	1369	5-3-13	Greentree	\$650.00	
6.	1383	6-4-13	Greentree	\$650.00	
7.	1392	7-5-13	Greentree	\$650.00	
8.	1401	8-5-13	Greentree	\$650.00	
9.	1412	9-5-13	Greentree	\$650.00	
10.	1425	10-5-13	Greentree	\$650.00	
11.	1437	11-2-13	Greentree	\$650.00	Filed law suit on November 25, 2013.
12.	1474	3-11-13	Greentree	\$650.00	payment scammed by Walston for own use.
Total payments for 2013				<u>\$7,800.00</u>	Actual cost for the year should have been not more than \$350.00/mo. The raise to \$400.00/mo for a studio apartment was not authorized until 2014 at the income base for Richardson. This is the first charge against Walston.

Copies of the above ledger is marked as XP A-1-A-4 attached to this document.

The above documents show the amount of money paid by the last contract signed on or about November 15, 2012 before Walston took over the landlord action from Dickson Rental Properties in Renton.

JURISDICTION

This court never made a ruling on jurisdiction whether or not the actions associated with the defendants/respondents to gain any type court order whether it be an order denying a temporary injunction for discovery under CR 26 or a motion for summary judgment. Respondents make no issue on jurisdiction.

MOTION FOR RECONSIDERATION -7-

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3 MOTION FOR RECONSIDERATION -8-

4 This court, likewise, made no finding on any type jurisdiction in favor of the
5 respondents. Nevertheless, the appellant's first brief on pages 7-10 explains in
6 great detail about subject matter jurisdiction and personal jurisdiction. The
7 appellant's answer brief on pages 9-10 explain what happens to jurisdiction when
8 a party to the action refuses to answer a claim within the required time set forth by
9 the summons that was 20 days excluding the day of service.
10

11 CR 60(b) states any judgment induced by an act of fraud is void. Page 5
12 of the appellant's answer brief lists the fraud with specificity. Page 12 at the
13 bottom line states "Defendant's refusal to comply with CR 4 to answer the
14 personally served claim within twenty (20) days, as directed by the summons,
15 vitiated any further actions by the defendants regardless of the writings of LGR
16 30. (See pages 3-4 of Appellant's Answer Brief) Page 8 of the answer brief states
17 with specificity that only one person need be personally served to toll service of
18 process on other parties. (See pages 9-10 of Appellant's Answer Brief)
19
20

21 The argument against LGR 30 is listed in the appellant's first brief in the
22 appendix to be on pages 1, 2, 9, and 12 as is attachments for Mandatory
23 Electronic Filing directing how exhibits proposed by e mail for a hearing or trial
24 is to be controlled by the clerk of the court. "Exhibit "A-1" under "A"
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26 MOTION FOR RECONSIDERATION -8-
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MOTION FOR RECONSIDERATION -9-

"Exceptions to mandatory e-filing include the following documents:" "(iii) Documents for filing during a court hearing or trial." Exhibit "A-3" shows all pleadings of the defendant were e-filed for all proceedings associated with this cause of action that included a denial of an order for temporary injunction, denial of an order for discovery, motion for summary judgment, notice of hearing were all documents submitted to the clerk of the court by e-mail in violation of the above exclusion. Counsel for the defense knew of this exception and knew about Judge Bowman being assigned to Ex Parte in Seattle from March 13 to May 25. He used this knowledge to scheme the court for a dismissal of the claim without answer required by multiple court rules and plaintiff's cited case law. (See page 13 of Appellant's Answer Brief.)

Damages Assessed Against Defendants and Peterson Russell Kelly PLLC

The original claim assessed the original damages including court costs at \$101,720.00. Now there is added costs of purposeful delay, fraud under CR 60(b), refusing to answer the claim as required under CR 4, 7(a), 12(b)(6), and CR 56 for gaining an order of dismissal without due process of law that governs the procedures used common to the King County Code LGR 30 that controls actions associated with attorneys practicing law in King County of Washington State.

MOTION FOR RECONSIDERATION -9-

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MOTION FOR RECONSIDERATION -10-

The appellant Wayne R. Richardson asks this court to grant damages against defendant's counsel Michael T. Callan and the firm Peterson Russell Kelly PLLC, sanctions under CR 11 and RAP 18.9 for purposeful delay under the fraud statute and Restatement Second of the Tort Reform Act § 7.6 the sum of \$10,000.00 each to be paid in full before they be authorized to regain representation for the defendants cited under this cause of action. Further, that this case be set before a jury to rule on any further, after the fact, charges against Jeanetta Walston, only landlord associated with Greentree Apartments in this cause of action.

Respectfully submitted by: *Aug. 13, 2015*
Wayne R. Richardson
Wayne R. Richardson, Pro Se Appellant/Plaintiff
P.O. Box 78618
Seattle, WA 98178-0618
(206)-772-6181 Home/Ans.
(206)-551-8064 cell

- Attachments:
1. Plaintiff's Check ledger from 1-3-2013-4-16-2014 listed XP A-1 through XP A-4
 2. This document to be delivered by ABC Legal Service to both Michael T. Callan and Peterson Russell Kelly PLLC.

There is a question of Callan's WSBA# if there be one, of having a legal right to represent a person in Washington State with all the e-mails associated with this cause of action in violation of LGR 30(A)(iii).

1329	1-3-13	Green tree apt	650 00 V	1038 00	300 16
1330	1-4-13	High way storage	77 00 V	1-14-13	223 16
1332	1-4-13	Springleaf	200 00 V	250 00	773 16
1333	1-17-13	Century Link VOIP	61 70 V	500 00	712 16
1334	1-23-13	Food Meyer	40 00 V	1-16-13	672 16
1335	1-25-13	Barfield	239 38 V		432 79
	1-22-13	Devo	121 24 V	2-1-13	311 85
1336	1-28-13	Food Meyer	60 00 V	1038 00	1659 94
1337	2-4-13	Highway storage	77 00 V		1573 94

1338	2-5-13	Green tree apt	650 00 V		523 94
1339	2-5-13	Springleaf	300 00 V		223 94
1340	2-6-13	Adalopt Klappert	133 70 V	2-20-13	0 24
1341	2-7-13	Food Meyer	60 00 V	400 00	429 90
1342	2-12-13	Food Meyer	20 00 V		429 90
1343	2-19-13	Seattle City Light	500 00 V		389 97
	2-22-13	Devo	121 20 V	2-22-13	238 70
1344	2-20-13	Barfield	247 07 V	350 00	347 66
1345	2-22-13	NW Life Insurance	296 98 V	3-1-13	44 68
1346	3-1-13	Cash Prairie	50 00 V	1038 00	1022 65
1347	3-1-13	Devo	95 00 V		937 65
1348	3-1-13	Food Meyer	60 00 V		877 65
1349	3-4-13	Highway storage	77 00 V		800 65
1350	3-11-13	Green tree apt March	650 00 V		150 65
1351	3-11-13	Food Meyer	60 00 V		

1352	3-11-13	Food Meyer	60 00 V		1372 68
1353	3-11-13	Food Meyer	60 00 V		121 68
1354	3-11-13	Food Meyer	60 00 V		320 68
1355	3-11-13	Green tree apt	650 00 V		1379 68
1356	3-11-13	Green tree apt	650 00 V		121 68
1357	3-11-13	Green tree apt	650 00 V		1379 68
1358	3-11-13	Green tree apt	650 00 V		121 68
1359	3-11-13	Green tree apt	650 00 V		1379 68
1360	3-11-13	Green tree apt	650 00 V		121 68
1361	3-11-13	Green tree apt	650 00 V		1379 68
1362	3-11-13	Green tree apt	650 00 V		121 68
1363	3-11-13	Green tree apt	650 00 V		1379 68
1364	3-11-13	Green tree apt	650 00 V		121 68
1365	3-11-13	Green tree apt	650 00 V		1379 68
1366	3-11-13	Green tree apt	650 00 V		121 68
1367	3-11-13	Green tree apt	650 00 V		1379 68
1368	3-11-13	Green tree apt	650 00 V		121 68
1369	3-11-13	Green tree apt	650 00 V		1379 68
1370	3-11-13	Green tree apt	650 00 V		121 68
1371	3-11-13	Green tree apt	650 00 V		1379 68
1372	3-11-13	Green tree apt	650 00 V		121 68
1373	3-11-13	Green tree apt	650 00 V		1379 68
1374	3-11-13	Green tree apt	650 00 V		121 68
1375	3-11-13	Green tree apt	650 00 V		1379 68
1376	3-11-13	Green tree apt	650 00 V		121 68
1377	3-11-13	Green tree apt	650 00 V		1379 68
1378	3-11-13	Green tree apt	650 00 V		121 68
1379	3-11-13	Green tree apt	650 00 V		1379 68
1380	3-11-13	Green tree apt	650 00 V		121 68

1373	5-9-13	Shyway Storage	72 00 V		248	17
1374	5-9-13	Red Meyer	58 96 V		173	17
1375	5-9-13	Red Meyer	50 00 V		114	25
1376	5-14-13	Sattle City Light	50 00 V	5-18-13 1700 00	64	28
1377	5-14-13	Red Meyer	60 00 V		712	28
1378	5-15-13	Cricket One Bank	382 47 V		654	28
BANK	5-22-13	Cash	119 94 V		271	28
1379	5-15-13	Spring Leaf	100 00 V	5-31-13	187	84
1380	5-28-13	Red Meyer	60 00 V	1038 00	87	84
1381	5-30-13	"	40 00 V		987	87
BANK	5-31-13	CASH DRAW	200 00 V		784	87
1382	6-4-13	Red Meyer	40 00 V	6-18-13	744	87
1383	6-4-13	Greentree Apartments	600 00 V	700 00	994	87

1384	6-19-13	Red Meyer	70 00 V		724	88
1385	6-19-13	"	125 00 V		599	88
	6-22-13	Diago	119 94 V		479	94
1386	6-28-13	Michaels	211 31 V		268	63
1387	6-24-13	Kony Co.	25 00 V	7-1-13	243	63
1388	6-24-13	Red Meyer	20 00 V	1038 00	223	63
1389	6-28-13	"	20 00 V		1248	63
BANK	7-2-13	CASH DRAW	100 00 V		1148	63
1390	7-2-13	Spring Leaf	200 00 V		941	63
1391	7-3-13	Shyway Storage	84 00 V		857	63
1392	7-8-13	Greentree Apts.	650 00 V		207	63
BANK	7-8-13	Capital One Bank Draw	50 00 V			

1393	7-8-13	Red Meyer	35 00 V	7-17-13		
1394	7-11-13	Red Meyer	50 00 V	700 00	739	65
1395		"	40 00 V		677	65
1396	7-13-13	Brenton High Ltd	35 00 V		397	65
1397	7-18-13	HSBC Card Services	300 00 V		277	71
BANK	7-22-13	Gen EDD Inc.	119 94 V		90	71
1398	7-22-13	Red Fashion Machine	187 00 V		50	71
1399	7-24-13	Red Meyer	40 00 V	1038 00	938	71
1400	7-27-13	"	50 00 V		288	71
BANK	8-3-13	Cash Draw	100 00 V		163	71
1401	8-5-13	Greentree Apts	650 00 V		123	71
1402	8-5-13	Spring Leaf	125 00 V		23	76
1403	8-8-13	Red Meyer	40 00 V	8-12-13		
1404	8-8-13	Capital One	100 00 V	75 00		
1405	8-10-13	Red Meyer	85 00 V	875 00		
1406	8-16-13	"	25 00 V			

1407	8-22-13	Sattle City Light	30 00 V		548	43
1408	8-25-13	Jo Ann	40 40 V			
BANK	8-29-13	Cash Draw	150 00 V	Aug 30 2013	398	43
	8-22-13	Diago	119 94 V	1038 00	1236	43
BANK	8-30-13	Cash Draw	200 00 V		1161	99
1409	9-2-13	Key's Elect	7444 V		1311	99
1410	9-4-13	Capital One VISA	150 00 V		927	99
1411	9-4-13	Shyway Storage	84 00 V		277	99
1412	9-5-13	Greentree Apts	650 00 V		207	99
1413	9-6-13	Red Meyer	40 00 V	209	198	25
1414	9-6-13	Jo Ann	9 74 V	100 00	328	28

1419	9-18-13	Capitol One	285 00V	900 00	9-18-13	285	99
1420	9-16-13	Fred Meyer	30 00V			30	99
1421	9-18-13	Springleaf	250 00V			250	99
1422	9-24-13	Bank of America	97 91V			97	99
1423	9-22-13	Bank of America	126 05V	10-1-13		126	99
1423	9-25-13	Fred Meyer	20 00V	103800		20	99
1424	9-28-13	Michael's	126 38V	10-7-13		126	99
1425	10-1-13	Cash & Carry	50 00V	150 00		50	99
1425	9-5-13	Greenleaf	250 00V	OK		250	99
1426	10-10-13	Capitol One	188 00V	10-12-13		188	99
1427	10-10-13	Capitol One	185 00V	706.00		185	99
1428	10-16-13	Capitol One	2212			2212	99

1429	10/16/13	Fred Meyer	885 00V	900000	10/16/13	885	99
1430	10/16/13	Springleaf	300 00V			300	99
1431	10/19/13	Fred Meyer	500 00V	10/16/13		500	99
1431	10/22/13	Bank of America	126 05V	445000		126	99
1432	10/19/13	Cash & Carry	80 00V			80	99
1432	10/19/13	Michael's	274 50V			274	99
1433	10/19/13	Fred Meyer	40 00V	103800		40	99
1434	10/19/13	Cash & Carry	37 00V			37	99
1435	10/19/13	Fred Meyer	60 00V			60	99
1436	10/21/13	Springleaf	84 00V			84	99
1437	11/2/13	Capitol One	85 00V			85	99
1438	11/2/13	Springleaf	X 575 00V			575	99

1441	11-14-13	Knox Co. Regard	35 00V			35	99
1442	11-22-13	Bank of America	56 96V			56	99
1443	11-25-13	Bank of America	240 00V	11-20-13		240	99
1444	11-25-13	Bank of America	65 00V	800000		65	99
1445	11-23-13	Bank of America	126 05V	11-24-13		126	99
1446	11-29-13	Cash & Carry	200 00V	103800		200	99
1447	12-2-13	CAPITAL ONE	203 00V			203	99
1448	12-2-13	"	300 00V			300	99
1449	12-3-13	Deat of Licensing	113 00V	599		113	99
1449	12-4-13	Springleaf	84 00V			84	99
1449	12-4-13	"	76 50V			76	99
1450	12-6-13	Springleaf	200 00V			200	99
1451	12-13-13	Seattle City Light	50 00V			50	99
1452	12-13-13	Bank of America	85 00V	17900		85	99
1453	12-15-13	Fred Meyer	65 00V			65	99
1453	12-15-13	Bank of America	41 57V			41	99

				1869	30			
1474	3-11-14	Queen Lee Dept	650	00V	1219	30		
1475	3-11-14	Shelby P.O. ^{Box} Realty	133	00V	1086	30		
1476	3-11-14	Springfield	500	00V	586	30		
1477	3-11-14	Discount ⁵⁰⁰	350	00V	632	30		
1478	3-11-14	Queen Lee Dept						
1479	3-15-14	Fred Meyer	55	00V	181	30		
1480	3-16-14	"	60	00V	3-17-14	421	30	
1482	3-18-14	Discount R.V.	100	00V	300	00	221	30
1481	3-29-14	Lower King for RV	109	50V	200	00	211	80
1483	3-21-14	ABC Legal Service	52	50V	3-19-00	854	30	
1484	3-28-14	Fred Meyer	35	00V		834	30	
1485	3-28-14	lit visit	25	00V		398	10	
1486	3-28-14	lit visit	25	00V		200	00	
1487	3-28-14	lit visit	25	00V		200	00	

1488	3-27-14	"	75	00V		194	15	
1489	3-27-14	"	30	00V		164	15	
1486	3-24-14	Rental space for M.H	84	21V	4-1-14	119	3	92
1487	3-21-14	Fred Meyer	25	00V	105400	1958	92	
1490	4-1-14	Fred Meyer	25	00V		1083	92	
1491	4-1-14	Dept. of Licensing	90	00V		993	92	
1492	4-1-14	Cash Draw	100	00V		893	92	
1493	4-1-14	Cash Draw	600	00V		293	92	
1494	4-1-14	Fred Meyer	95	00V		198	92	
1495	4-1-14	Cash Draw	50	00V		148	92	
1493	4-8-14	Capital One 2212	75	00V		73	92	
1494	4-8-14	Fred Meyer	25	00V	4-14-14	48	92	
1495	4-8-14	Cash Draw	25	00V	4-6-14	29	92	
1495	4-14-14	Fred Meyer	35	00V	800	804	92	
1496	4-16-14	Fred Meyer	76	64V		728	90	
1497	4-18-14	Capital One 8673	100	00V		628	30	