

START

OF

REEL

REEL: S-11137

FILM
DATE: 4-25-94

CAMERA:
MICRO AUTO 16-27X

START: 89-2-01173-5

END: 86-2-18176-8 SUB
267

MICROFILM CERTIFICATE

COUNTY OF KING

STATE OF WASHINGTON

THE PAPERS AND DOCUMENTS APPEARING ON THIS ROLL OF FILM WERE PHOTOGRAPHED BY YOUR AFFIANT AND THAT SAID PAPERS AND DOCUMENTS ARE TRUE AND CORRECT COPIES OF THE ORIGINALS THEREOF AS THE SAME APPEARED ON RECORD IN THE CUSTODY OF THE KING COUNTY CLERK. THE MICROFILMING OF THE PAPERS AND DOCUMENTS AS AFORESAID WAS DONE IN THE PURSUANCE OF, AND IN CONFORMANCE WITH PROVISIONS OF THE STATUTES IN THESE CASES MADE AND PROVIDED FOR AS THEY APPEAR IN TITLE 40, OF THE REVISED CODE OF WASHINGTON.

I, THE UNDERSIGNED, DO CERTIFY, UNDER PENALTY OF PERJURY, THAT THE ABOVE STATEMENT IS TRUE AND CORRECT.

Wilma J. Jones *4-25-74*

SIGNATURE DATE

NORTHWEST CENTER INDUSTRIES

POINT SIZE

4
6
8
10
12
14

Zpny 1a2 3b4 5c6

Hq47i W9pa9 A7o7q Ge92

Su1xi 33q7n Oelvf 4e18k

2xbiy Gmn0c
Y5a5o E1t9g

7n34a K2b8t
D6fmh 9ss9d

Wcuzl L1cdg
6Y3sl Okjdg

FUTURA

NEWS GOTHIC

14 K2b8t Okjdg
4ef8k Gmn0c

12 Zlo6x Ge92
7n34a 6Y3sl

10 Y0r8j A7o7q
Oelvf 2xbiy

8 9ss9d L1cdg
33q7n E1t9g

6 Z35lg Hq47i Su1xi Y5a5

4

POINT SIZE

POINT

SERIF (BASKERVILLE) SIZE SANS SERIF (MICROFONT)

4 6 8 10 12 14

CPTRB NKAJK RNCU ZLCO ZCGB

IZCGB USHTP PMSB OIRQG

XMBBO HWEKH XYAHQ SIDDS

VILNU MZHSF XMBBO HWEKH

EB7AU FUDWM B00NF

Z7QYI OKJDG

8tixz Wo8nk C6Jfm Zm79a

DM355

buNy

Rho9t Umkh9 Eeafd

3s43l iskrY

8tixz Wo8nk 8tizx

4 C9E83 B1BAJ

150mm

6"

PRECISIONSM RESOLUTION TARGETS



1303 Geneva Avenue
St. Paul, MN 55119

CASE#: 86-2-18176-8 CIVIL JUDGMENT# YES JUDGE ID: 025
 TITLE: BUTLER ET VIR ETAL VS BARNETT ETUX ETANO
 FILED: 07-31-86
 CAUSE: TTO TORT-OTHER
 RESOLUTION: DSM DATE: 09-16-87 DISMISSAL WITHOUT TRIAL
 COMPLETION: JODF DATE: 09-16-87 JUDGMENT/ORDER/DECREE FILED
 CASE STATUS: DATE:

ARCHIVED: 04-04-93

CONSOLIDATED: 86-2-18429-5 86-2-26360-8 88-2-04615-8 88-2-18321-0 87-2-14919-6

NOTE1: *CASE SET P3 *CONSOL SUB #39 *CIVIL TRACK I, SUB 134

NOTE2: *CONSOL SUB #219 & 270 *PROTECTIVE ORDER SUB 321

-----PARTIES-----

CONN	LAST NAME,	FIRST MI TITLE	LITIGANTS	DATE
PLA01	BUTLER, KATHY L		STPR	05-02-89
PLA02	BUTLER, STEPHEN L	W/H	STPR	05-02-89
PLA03	BUTLER, KATHY L		STPR	05-02-89
MNR01	LIEN, SCOTT W		STPR	05-02-89
MNR02	LIEN, RANDY W		STPR	05-02-89
PLA04	BROWN, SANDI L		STPR	05-02-89
PLA05	BROWN, LYLE D	W/H	STPR	05-02-89
PLA06	FELLHAUER, DORA			
MNR03	BROWN, TARA L		STPR	05-02-89
MNR04	BROWN, TROY S		STPR	05-02-89
PLA07	HALL, CHRISTINE		STPR	05-02-89
PLA08	HALL, DONALD T	W/H		
PLA09	EHRlich, SANDY			
PLA10	EHRlich, MICHAEL			
PLA11	LEMKE, LARRY			
MNR05	LEMKE, SYBIL			
PLA12	CHABOT, DEE			
MNR06	CHABOT, SHAWNA MICHELLE			
MNR07	CHABOT, MICHAEL GRANT			
MNR08	CHABOT, NICHOLAS STERLING			
PLA13	KITCHELL, CATHERINE			
PLA14	KITCHELL, RONALD			
MNR09	KITCHELL, WENDY			
GAL01	KITCHELL, CATHERINE			
PLA15	JORGENSON, MAUREEN P			
DEF01	BARNETT, DONALD L			
DEF02	BARNETT, BARBARA H/W			
DEF03	COMMUNITY CHAPEL & BIBLE TRAINING CENTER			
DEF04	ALSKOG, RALPH			
DEF05	ALSKOG, ROSEMARY			
DEF06	HOWERTON, ROBERT			
3DF01	LIEN, GARY			

-----ATTORNEYS-----

CONN	LAST NAME,	FIRST MI TITLE	LITIGANTS	DATE
WTP01	KARGIANIS, GEORGE		1-8, MNR	
ATP02	CAMPICHE, JEFFERY		1	
ATD01	MARTIN, DAVID L		1-3	
WTD02	BOND, MICHAEL J		1-3	

CASE#: 86-2-18176-8 CIVIL JUDGMENT# YES JUDGE ID: 025
 TITLE: BUTLER ET VIR ETAL VS BARNETT ETUX ETANO

-----ATTORNEYS-----

CONN	LAST NAME,	FIRST MI	TITLE	LITIGANTS	DATE
WTD03	BUGNI, MICHAEL W			1-3	
ATD04	HOLLENBECK, RODNEY D				
ATD05	DONALDSON, TIM				
ATD06	ROSENOW, JACK G			4-5	
ATD07	SMETKA, PAULINE V				
ATD08	DURHAM, ANN J				
ATD09	MESSINA, JOHN				
A3D01	MAYHEW, ALVIN D JR				
ATD10	CRAVEN, JAMES S			1,2	
ATD11	JONES, SUSAN D				
ATD12	BOLTON, KEITH A			6	
ATD13	ROHAN, ROBERT J			3	
ATD14	SHAPIRO, ANTHONY D			3	
ATD15	RAYMOND, MARTHA E				

-----APPEARANCE DOCKET-----

SUB#	DATE	CD/CONN	DESCRIPTION	SECONDARY	MICROFILM
-	07-31-86	\$FFRC	FILING FEE RECEIVED - CIVIL KARGIANIS & AUSTIN	70.00	
1	07-31-86	SMCMP	SUMMONS & COMPLAINT		
2	07-31-86	PT	PETITION FOR		
3	07-31-86	ORAPGL	ORDER APPOINTING GUARDIAN AD LITEM FOR SCOTT WILLIAM LIEN		
4	07-31-86	CON	CONSENT TO ACT AS G.A.L.		
5	07-31-86	PT	PETITION FOR		
6	07-31-86	ORAPGL	ORDER APPOINTING GUARDIAN AD LITEM FOR TARA LYNN BROWN		
7	07-31-86	CON	CONSENT TO ACT AS G.A.L.		
8	07-31-86	PT	PETITION FOR		
9	07-31-86	ORAPGL	ORDER APPOINTING GUARDIAN AD LITEM FOR RANDY WILLIAM LIEN		
10	07-31-86	CON	CONSENT TO ACT AS G.A.L.		
11	07-31-86	PT	PETITION FOR		
12	07-31-86	ORAPGL	ORDER APPOINTING GUARDIAN AD LITEM FOR TROY STEVEN BROWN		
13	07-31-86	CON	CONSENT TO ACT AS G.A.L.		
14	08-05-86	\$AFSR	AFFIDAVIT OF SERVICE	60.00	
15	08-18-86	APR	APPEARANCE LEE SMART ET AL FOR DEFS BARNETT & COMMUNITY CHAPEL		
16	08-19-86	APR	APPEARANCE LEE SMART ETAL & MOREN LAGESCHULTE ETAL FOR ALL DEFS		
17	11-18-86	ORARC	ORDER AUTHOR REMOVAL OF COURT FILE		
18	12-22-86	\$SHRT	SHERIFF'S RETURN	23.00	
19	01-07-87	MTAFOD	MOTION & AFFDVT FOR ORD OF DEFAULT	01-21-87MS	
20	01-07-87	NTMTDK	NOTE FOR MOTION DOCKET		
21	01-08-87	ANCC	ANSWER & COUNTER CLAIM /ALL DEFS		
-	01-21-87	MINUTE	CIVIL MOTIONS CAL		
22	07-30-87	MTCM	DEF'S MTN TO COMPL DISCOVERY	08-07-87MS	
23	07-30-87	NTMTDK	NOTE FOR MOTION DOCKET		
24	07-30-87	CRTC	CERTIFICATE OF COMPLIANCE		

CASE#: 86-2-18176-8 CIVIL JUDGMENT# YES
 TITLE: BUTLER ETVIR ETAL VS BARNETT ETUX ETANO

JUDGE ID: 025

-----APPEARANCE DOCKET-----

SUB#	DATE	CD/CONN	DESCRIPTION	SECONDARY	MICROFILM
-	08-07-87	PREHRG	CIVIL MOTIONS CAL		
25	08-07-87	ORCD	ORDER COMPELLING DISCOVERY		
26	08-21-87	NTTNSA	NT FOR TRIAL & STMNT OF NONARBITRA		
		ACTION	TORTS FOR SEXUAL ASSAULT, LIBEL,		
		ACTION	SLANDER, WRONGFUL DISFELLOWSHIP		
		ACTION	15 DAYS		
27	09-08-87	MTDSM	MOTION TO DISMISS-DEF'S	09-16-87MS	
28	09-08-87	NTMTDK	NOTE FOR MOTION DOCKET		
29	09-15-87	AF	AFFIDAVIT OF L HARRIS		
30	09-15-87	AF	AFFIDAVIT OF JEFFERY CAMPICHE		
31	09-16-87	ORDSM	ORDER OF DISMISSAL		
-	09-16-87	DISPHRG	CIVIL MOTIONS CAL		
32	11-10-87	NTWDA	NOTICE OF WITHDRAWAL OF ATTORNEY		
		WTD03	BUGNI, MICHAEL W		
33	11-12-87	NTWDA	NOTICE OF WITHDRAWAL OF ATTORNEY		
		WTD02	BOND, MICHAEL J		
34	11-13-87	JN	JOINDER MT TO CONSOLIDATE		
35	11-13-87	RQACT	REQUEST FOR ASSIGN TO CIVIL TRACK I		
35.5	11-13-87	OB	OBJECTIONS TO WITHDRAWAL/DEF ATTY		
36	11-16-87	ORACT	ORD ASSIGN CASE TO CIVIL TRACK I		
37	11-17-87	ORWA	ORDER FOR WITHDRWL OF ATTORNEY FOR		
			BARNETT ET AL		
38	11-17-87	PREHRG	CR BEVERLY GUY		
		JDG19	JUDGE GARY M LITTLE, DEPT 19		
39	11-17-87	ORCT	ORDER CONSOLIDATING FOR TRIAL		
40	12-15-87	APR	APPEARANCE FOR BARNETT		
		ATD04	HOLLENBECK, RODNEY D		
41	01-08-88	PREHRG	CR NOT REPORTED		
		JDG19	JUDGE GARY M LITTLE, DEPT 19		
42	02-08-88	MT	11A;MT FOR SEPARATE TRIAL	03-04-88	
43	02-08-88	NTMTDK	NOTE FOR MOTION DOCKET		
44	02-08-88	AF	AFFIDAVIT OF J G ROSENOW		
45	02-16-88	OR	ORDER FOR PRETRIAL DISCOVERY		
46	02-24-88	JN	JOINDER DFS BARNETT IN ALSKOG MT		
47	02-26-88	BR	BRIEF IN OPPOSIT FOR SEPARATE		
			TRIAL		
48	03-01-88	NTHG	NOTICE OF HEARING	03-25-88	
			3:00 MTN FOR SEPARATE TRIAL		
49	03-08-88	MT	MOTION	03-25-88	
		ACTION	3:00/LITTLE/MTN RE JOINING PLAINTIF		
		ACTION	& AMENDING COMPLAINT		
50	03-08-88	NTMTDK	NOTE FOR MOTION DOCKET		
51	03-08-88	AMCPT	AMENDED COMPLAINT		
52	03-08-88	AF	AFFIDAVIT & MEMO OF R H ADLER		
53	03-16-88	BR	BRIEF IN REPLY TO MTN TO SEVER		
54	03-24-88	BR	BRIEF IN SUPP MTN SEPARATE TRIAL		
55	03-24-88	BR	BRIEF IN OPP MTN SEPARATE TRIAL/PLA		
56	03-25-88	OR	ORDER PERMITTING JOINDER OF PLTFS		
56.5	03-25-88	PREHRG	CR DAVE ERWIN		
		JDG19	JUDGE GARY M LITTLE, DEPT 19		
57	03-28-88	SBDT	SUBPOENA DUCES TECUM		

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SUB#	DATE	CD/CONN	DESCRIPTION	SECONDARY	MICROFILM
			FILED BY SPECIFIC CASE NAME		
92	06-27-88	PREHRG	CR GARY CRAWFORD		
		JDG19	JUDGE GARY M LITTLE, DEPT 19		
93	06-27-88	MT	MOTION TO COMPEL DISCOVERY		
94	06-27-88	AF	AFFIDAVIT SUSAN DELANTY		
95	06-27-88	NTMTDK	NOTE FOR MOTION DOCKET	07-01-88	
		ACTION	10:45/LITTLE/MTN TO COMPEL		
96	06-28-88	INT	INTERROGATORIES		
97	07-01-88	NTIWD	NOTICE OF INTENT TO WITHDRAW		
		WTP01	KARGIANIS, GEORGE		
98	07-01-88	ORCD	ORDER COMPELLING DISCOVERY		
99	07-20-88	AFML	AFFIDAVIT OF MAILING		
100	07-20-88	RQPD	REQUEST FOR PRODUCTION OF DOCUMENTS (PG 1 ONLY)		
101	07-20-88	RQPD	REQUEST FOR PRODUCTION OF DOCUMENTS (PG 1 ONLY)		
102	07-25-88	AFSR	AFFIDAVIT OF SERVICE		
103	07-25-88	WTRC	WITNESS RECORD		
104	08-01-88	ANI	ANSWER TO INTERROGS/JORGENSEN		
105	08-02-88	NTMTDK	NOTE FOR MOTION DOCKET	08-12-88	
		ACTION	11:00/LITL/MTN TO COMPEL DISCOVERY		
106	08-02-88	MTCM	MOTION TO COMPEL DISCOVERY		
107	08-02-88	AF	AFFIDAVIT IN SUPPORT/SUSAN D JONES		
108	08-04-88	INTAN	INTERROGATORIES & ANSWERS		
109	08-09-88	ANI	ANSWER TO INTERROGATORIES DEF		
110	08-09-88	ANI	ANSWER TO INTERROGATORIES DEF		
111	08-10-88	RQPD	REQUEST FOR PRODUCTION OF DOCUMENTS		
112	08-10-88	NTOEX	NOTICE OF ORAL EXAM		
113	08-15-88	AFSR	AFFIDAVIT OF SERVICE		
114	08-15-88	AFSR	AFFIDAVIT OF SERVICE		
115	08-15-88	AFSR	AFFIDAVIT OF SERVICE		
116	08-25-88	NTOEX	NOTICE OF ORAL EXAM		
117	08-25-88	SBDT	SUBPOENA DUCES TECUM		
118	08-25-88	AFSR	AFFIDAVIT OF SERVICE		
119	08-25-88	SBDT	SUBPOENA DUCES TECUM		
120	08-25-88	NTOEX	NOTICE OF ORAL EXAM		
121	08-25-88	AFSR	AFFIDAVIT OF SERVICE		
122	08-26-88	SBDT	SUBPOENA DUCES TECUM		
123	08-26-88	NTOEX	NOTICE OF ORAL EXAM		
124	08-26-88	AFSR	AFFIDAVIT OF SERVICE		
125	08-29-88	SBDT	SUBPOENA DUCES TECUM		
126	08-29-88	NTOEX	NOTICE OF ORAL EXAM		
127	08-29-88	AFSR	AFFIDAVIT OF SERVICE		
128	08-29-88	AFSR	AFFIDAVIT OF SERVICE		
129	08-29-88	AFSR	AFFIDAVIT OF SERVICE		
130	08-30-88	AFSR	AFFIDAVIT OF SERVICE		
131	08-30-88	NTOEX	NOTICE OF ORAL EXAM		
-	08-30-88	DEPR	DEPOSITION RECEIVED OF DONALD LEE BARNETT		
132	09-01-88	NTOEX	NOTICE OF ORAL EXAM		
133	09-01-88	AFSR	AFFIDAVIT OF SERVICE		

CASE#: 86-2-18176-8 CIVIL JUDGMENT# YES

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SUB#	DATE	CD/CONN	DESCRIPTION	SECONDARY	MICROFILM
134	09-12-88	ORACT	ORD REASSIGN CASE TO CIVIL TRACK I		
135	10-04-88	RQSD	REQUEST FOR STATEMENT OF DAMAGES		
136	10-04-88	NTASCC ATD07	NOTICE OF ASSOCIATION OF COUNSEL SMETKA, PAULINE V		
137	10-21-88	MTAF	2P;RILEY;MTN/AFDVT FOR SEP TRIAL	11-10-88	
138	10-21-88	NTMTDK	NOTE FOR MOTION DOCKET		
139	10-21-88	NTMTDK	NOTE FOR MOTION DOCKET	11-10-88	
		ACTION	2:00/RILEY/MT COMPEL ID OF ATTY		
140	10-21-88	MTCM	MOTION TO COMPEL IDENT OF COUNSEL		
141	10-21-88	DCLR	DECLARATION A DURHAM		
142	10-24-88	NTACA	NOTICE OF ATTY CHANGE OF ADDRESS		
143	10-28-88	AFML	AFFIDAVIT OF MAILING		
144	10-28-88	WL	WITNESS LIST /PLA JORGENSEN		
145	11-01-88	AFML	AFFIDAVIT OF MAILING		
146	11-01-88	BR	BRIEF IN OPPO TO MT/EHRLICH ET AL		
147	11-04-88	BR	BRIEF REBUTTAL BARNETT RE SEPARATE		
148	11-04-88	WL	WITNESS LIST		
149	11-07-88	MM	MEMORANDUM/CONTENTIONS OF JORGENSEN		
150	11-07-88	MM	MEMORANDUM OF JORGENSEN		
151	11-07-88	MM	MEMORANDUM		
152	11-07-88	AF	AFFIDAVIT OF RODNEY HOLLENBECK		
153	11-09-88	BR	SUPL BRIEF/EHRLICH		
154	11-09-88	MM	MEMORANDUM & SUMMARY/DEF BARNETTS		
1545	11-10-88	PREHRG JDG25	CR HILARY GRUNDY JUDGE JOHN RILEY, DEPT 25		
155	11-14-88	AF	AFFIDAVIT OF LESLIE S HARRIS		
156	11-14-88	AFML	AFFIDAVIT OF MAILING		
157	11-14-88	MT	MOTION TO AMEND COMPLAINT		
158	11-14-88	AFML	AFFIDAVIT OF MAILING		
159	11-14-88	MM	MEMORANDUM/ERHLICH		
160	11-14-88	WL	WITNESS LIST/COMMUNITY CHAPEL		
161	11-14-88	MM	MEMORANDUM /COMMUNITY CHAPEL		
162	11-14-88	JN	JOINDER		
163	11-14-88	NTAPR	NOTICE OF APPEARANCE		
164	11-14-88	DCLR	DECLARATION OF MAILING		
165	11-14-88	AGOR	AGREED ORDER FOR PRE-TRIAL DISCVRY		
166	11-14-88	MT	MOTION TO AMEND COMPLAINT		
167	11-14-88	DCLR	DECLARATION		
168	11-28-88	AFSR	AFFIDAVIT OF SERVICE		
169	11-28-88	NTOEX	NOTICE OF ORAL EXAM		
170	11-29-88	NTOEX	NOTICE OF ORAL EXAM		
171	11-29-88	NTOEX	NOTICE OF ORAL EXAM AMENDED		
172	12-02-88	NTMTDK	NOTE FOR MOTION DOCKET	11-10-88	
		ACTION	2:00/RILEY/MT FOR SEPARATE TRIAL		
1725	12-02-88	AN	ANSWER TO ADMISSIONS		
173	12-06-88	MT	MOTION		
		ACTION	MT OF STPAUL FOR INTERVENTION &		
		ACTION	CONSOLIDATION		
174	12-06-88	AN	ANSWER TO MOTION FOR SUMM JDGMT /COMMUNITY CHAPEL		
175	12-07-88	NTMTDK	NOTE FOR MOTION DOCKET	12-22-88	

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SUB#	DATE	CD/CONN	DESCRIPTION	SECONDARY	MICROFILM
			ACTION 3:00/RILEY/MTN AMEND 1ST AMENDED ACTION COMPLAINT		
176	12-07-88	AFML	AFFIDAVIT OF MAILING		
177	12-07-88	AKSR	ACKNOWLEDGMENT OF SERVICE		
178	12-07-88	RSP	RESPONSE TO MOTION FOR SUMM JDGMT		
179	12-07-88	MM	MEMORANDUM OPPOSING MOTION FOR SUMM JDGMT/ALSKOG		
180	12-07-88	AFSRML	AFFIDAVIT OF SERVICE BY MAIL		
181	12-07-88	NTOEX	NOTICE OF ORAL EXAM		
182	12-07-88	MM	MEMORANDUM IN SUPP AMEND		
183	12-07-88	AMCPT	AMENDED COMPLAINT		
184	12-07-88	AF	AFFIDAVIT OF SUSAN JONES		
185	12-07-88	AFSRML	AFFIDAVIT OF SERVICE BY MAIL		
1855	12-07-88	MT	MOTION OF MAUREEN JORGENSEN		
186	12-12-88	AKSR	ACKNOWLEDGMENT OF SERVICE		
187	12-12-88	MT	MOTION	12-22-88	
			ACTION 3:00/RILEY/MTN FR PROT ORD SEAL DEP		
188	12-12-88	NTMTDK	NOTE FOR MOTION DOCKET		
189	12-12-88	AF	AFFIDAVIT OF D BARNETT		
190	12-14-88	DCLR	DECLARATION OF M BOND		
191	12-14-88	OB	OBJECTIONS TO MOTION TO AMEND		
1915	12-15-88	ACSR	ACCEPTANCE OF SERVICE		
192	12-16-88	MT	MOTION INTERVENE RE MT BY DONALD LEE BARNETT & BARBARA BARNETT FR PROTECTIVE ORD SEALG THEIR DEPOS		
193	12-16-88	MT	MT SHORTEN TIME TO HEAR MT FR INTERVENTN OF FISHER BROADCASTG INC		
194	12-16-88	NTHG	NOTICE OF HEARING		
195	12-16-88	ORSGT	3:00/RILEY/ORD SHORTENG TIME	12-22-88	
196	12-16-88	ACSR	ACCEPTANCE OF SERVICE		
197	12-19-88	NTOEX	NOTICE OF ORAL EXAM		
198	12-20-88	RSP	RESPONSE IN OPPOSIT SUMM JUDGMENT		
199	12-20-88	MM	MEMORANDUM OPPOS PROTECTIVE ORDER		
200	12-20-88	MM	MEMORANDUM BARNETT PRELIM RE DUTIES		
201	12-20-88	AFSR	AFFIDAVIT OF SERVICE		
202	12-20-88	AFSRML	AFFIDAVIT OF SERVICE BY MAIL		
203	12-20-88	AF	AFFIDAVIT OF S JONES		
204	12-20-88	NT	NOTICE OF WITHDRAWAL OF MOTION TO INTERVENE IN RE MOTION		
2044	12-20-88	MMATH	MEMORANDUM OF AUTHORITIES		
2045	12-21-88	MM	MEMORANDUM OF PLTF M JORGENSEN ON STANDARD OF CARE		
2046	12-21-88	AF	AFFIDAVIT OF B WINCHELL OPPSINGMTN		
2047	12-21-88	AF	AFFIDAVIT OF GLASSMAN/SUPPL		
205	12-22-88	NTMDLF	NOTE FOR MOTION DOCKET-LATE FILING	12-22-88	
			ACTION 3:00/RILEY/MT COMPEL DISCOVERY		
206	12-22-88	AFSR	AFFIDAVIT OF SERVICE		
207	12-23-88	AN	ANSWER AMENDED		
208	12-22-88	PREHRG	CR RAELENE SEMAGO		
			JDG25 JUDGE JOHN RILEY, DEPT 25		
209	12-22-88	MM	MEMORANDUM OPPSING SMMRY JDGMNT		

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SUB#	DATE	CD/CONN	DESCRIPTION	SECONDARY	MICROFILM
210	12-23-88	OR	ORDER GRANTING LEAVE TO AMEND		
211	12-23-88	OR	ORDER PROTECTING BARNETTS DEPOS		
212	12-23-88	PORD	PROTECTIVE ORDER TO SPECIFY TERMS OF ORAL EXAM		
213	12-23-88	OR	ORDER GRANTING LEAVE TO AMEND & FILE COMPLAINT OF M P JORGENSEN		
214	12-27-88	DCLR	DECLARATION OF MICHAEL W BUGNI		
215	12-27-88	DCLR	DECLARATION OF MICHAEL W BUGNI		
216	12-29-88	CRRSP	CORRESPONDENCE		
217	12-30-88	APR	APPEARANCE FOR EHRlich/LEMKE		
		ATD09	MESSINA, JOHN		
218	12-30-88	CR	CERTIFICATE OF SERVICE		
219	12-29-88	ORCNS	ORDER CONSOLIDATING CASES		
220	01-04-89	WL	WITNESS LIST		
221	01-05-89	RSP	RESPONSE TO MEMORANDUM SPPRT MTN		
222	01-05-89	ANCC	ANSWER & COUNTER CLAIM		
223	01-05-89	APR	APPEARANCE FOR GARY LIEN		
		A3D01	MAYHEW, ALVIN D JR		
224	01-05-89	NTOEX	NOTICE OF ORAL EXAM		
225	01-05-89	AFSRML	AFFIDAVIT OF SERVICE BY MAIL		
2255	01-05-89	WL	WITNESS LIST/BUTLER		
226	01-06-89	NTOEX	NOTICE OF ORAL EXAM		
227	01-06-89	NTOEX	NOTICE OF ORAL EXAM		
228	01-06-89	AFSRML	AFFIDAVIT OF SERVICE BY MAIL		
229	01-06-89	PREHRG	CR VICTORIA RACCAGNO		
		JDG25	JUDGE JOHN RILEY, DEPT 25		
230	01-13-89	OR	ORDER PERMITTING AMEND COMPLAINT		
231	01-13-89	AMCPT	AMENDED COMPLAINT		
232	01-18-89	AFML	AFFIDAVIT OF MAILING		
233	01-18-89	NTOEX	NOTICE OF ORAL EXAM		
234	01-19-89	AFSR	AFFIDAVIT OF SERVICE BY MAIL		
235	01-19-89	OB	OBJECTION TO WITHDRAWAL ATTY		
236	01-19-89	WL	WITNESS LIST/EXPERT		
237	01-23-89	NTIWD	NOTICE OF INTENT TO WITHDRAW		
		WTD02	BOND, MICHAEL J		
238	01-24-89	AFSRML	AFFIDAVIT OF SERVICE BY MAIL		
239	01-24-89	OB	OBJECTIONS TO PROPOSED W/DRAWL OF ATTY/M JORGENSEN		
240	01-26-89	AFML	AFFIDAVIT OF MAILING		
241	01-26-89	NTAPR	NOTICE OF APPEARANCE		
		ATD10	CRAVEN, JAMES S		
242	01-27-89	AFML	AFFIDAVIT OF MAILING		
243	01-27-89	APR	APPEARANCE FOR JORGENSEN		
		ATD11	JONES, SUSAN D		
244	02-03-89	NTWSUB	NOTICE WITHDRAW & SUBSTITUT COUNSEL		
		WTD02	BOND, MICHAEL J		
245	02-06-89	MT	MOTION FOR SEPARATE TRIAL		
2455	02-06-89	PREHRG	CR RAELENE SEMAGO		
		JDG25	JUDGE JOHN RILEY, DEPT 25		
246	02-06-89	AFS	AFFIDAVIT IN SUPPORT SEPARATE TRIAL		
247	02-06-89	BR	BRIEF/DEF		

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TITLE: BUTLER ETVIR ETAL VS BARNETT ETUX ETANO

JUDGE ID: 025

-----APPEARANCE DOCKET-----

SUB#	DATE	CD/CONN	DESCRIPTION	SECONDARY	MICROFILM
248	02-06-89	LTR	LETTER		
249	02-06-89	ACSR	ACCEPTANCE OF SERVICE		
250	02-07-89	MT	MOTION	02-23-89	
		ACTION	3:00/E845/MTN STRIKE TRIAL DATE BY		
		ACTION	DEF ALSKOG		
251	02-07-89	NTMTDK	NOTE FOR MOTION DOCKET		
252	02-07-89	AF	AFFIDAVIT OF JACK G ROSENOW		
253	02-08-89	AFML	AFFIDAVIT OF MAILING		
2535	02-09-89	AFSR	AFFIDAVIT OF SERVICE		
254	02-10-89	DRT	DISCLOSURE REGARDING TRIAL EXPERT WITNESSES/ALSKOG		
255	02-13-89	AF	AFFIDAVIT OF SUSAN JONES		
256	02-13-89	MM	MEMORANDUM IN SUPP DISQUALIFY		
257	02-13-89	MT	MOTION RE DISQUALIFICATION OF ATTYS		
258	02-14-89	CRRSP	CORRESPONDENCE		
259	02-14-89	MM	MEMORANDUM IN OPPOSIT STRIKE TRIAL DATE		
260	02-14-89	DCLR	DECLARATION OF ANN DURHAM		
261	02-16-89	CR	CERTIFICATE OF SERVICE		
262	02-17-89	AF	AFFIDAVIT M W SCHULTHEIS		
263	02-17-89	ORDSM	ORDER OF DISMISSAL VS ALL		
		EXP01	EX-PARTE, DEPT		
264	02-17-89	NTOEX	NOTICE OF ORAL EXAM		
265	02-17-89	NTOEX	NOTICE OF ORAL EXAM		
2655	02-22-89	MT	MOTION FOR TRIAL DATE		
266	02-23-89	PREHRG	CR DOROTHY STILES		
		JDG25	JUDGE JOHN RILEY, DEPT 25		
2665	02-23-89	INT	INTERROGATORIES		
267	02-24-89	AFSRML	AFFIDAVIT OF SERVICE BY MAIL		
268	02-24-89	BR	BRIEF/BARNETTS IN SUPPORT OF MOTION		
269	02-24-89	NTHG	NOTICE OF HEARING	03-17-89	
		ACTION	2:30/RILEY/MT FR PARTIAL DISMISSAL		
270	02-24-89	ORCNS	ORDER CONSOLIDATING CASES		
			ADDING 88-2-14919-6		
271	02-24-89	NTWSUB	NOTICE WITHDRAW & SUBSTITUT COUNSEL		
		ATD12	BOLTON, KEITH A		
272	02-24-89	ORDYMT	ORDER DENYING MOTION TO DISQUALIFY		
273	02-24-89	MT	MOTION FOR PARIAL DISMISSAL/BARNETT		
2735	02-24-89	OR	ORDER-PRETRIAL-RE STATEMENT OF FACT		
274	02-27-89	DCLR	DECLARATION OF MICHAEL W BUGNI		
275	02-28-89	NT	NOTICE DESIGNATION EXPERT WITNESES		
276	02-28-89	AFSR	AFFIDAVIT OF SERVICE		
2765	02-28-89	MINUTE	NOT REPORTED		
		JDG25	JUDGE JOHN RILEY, DEPT 25		
277	03-03-89	MTCM	MOTION TO COMPEL	03-17-89	
		ACTION	2:30/RILEY/MT CMPL PL SUBMIT TO IME		
278	03-03-89	NTMTDK	NOTE FOR MOTION DOCKET		
279	03-03-89	AFML	AFFIDAVIT OF MAILING		
280	03-03-89	AF	AFFIDAVIT OF RICHARD CARTER MD		
281	03-03-89	AF	AFFIDAVIT OF JACK G ROSENOW		
282	03-06-89	NTMTDK	NOTE FOR MOTION DOCKET	03-17-89	

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 TITLE: BUTLER ETVIR ETAL VS BARNETT ETUX ETANO

JUDGE ID: 025

-----APPEARANCE DOCKET-----

SUB#	DATE	CD/CONN	DESCRIPTION	SECONDARY	MICROFILM
			ACTION 2:30/RILEY/MT CONSOLIDATE		
			ACTION GARY LIEN LITIGATN		
283	03-06-89	MT	MT OF STPAUL FIRE & MARINE INSURANC CO TO CONSOLIDATE GARY LIEN LITGTN		
284	03-06-89	NTWSUB	NOTICE WITHDRAW & SUBSTITUT COUNSEL		
		ATD13	ROHAN, ROBERT J		
285	03-06-89	CR	CERTIFICATE OF SERVICE		
286	03-06-89	MT	MOTION FOR PARTIAL DISMISSAL		
287	03-07-89	AFSRML	AFFIDAVIT OF SERVICE BY MAIL		
288	03-07-89	NTOEX	NOTICE OF ORAL EXAM		
2885	03-07-89	RSP	RESPONSE TO MT TO CONSOLIDATE GARY LIEN LITIGATION/COM CHAPEL BIBLE		
289	03-08-89	MT	MOTION FR DUAL JURY IMPLEMENT		
290	03-08-89	NTMTDK	NOTE FOR MOTION DOCKET	03-21-89FM	
		ACTION	MTN FR TEMPORARY MODIFICATN OF SUPT		
291	03-08-89	MTCM	MOTION TO COMPEL	03-17-89	
		ACTION	1:30/RILEY/MTN TO COMPEL DISCOVERY		
292	02-08-89	NTMTDK	NOTE FOR MOTION DOCKET		
2925	03-08-89	MM	MEMORANDUM RE MT FOR TRIAL DATE		
2926	03-08-89	CRTC	CERTIFICATE OF COMPLIANCE		
2927	03-08-89	MM	MEMO OF BARNETTS & CCBTC		
2928	03-08-89	AFML	AFFIDAVIT OF MAILING		
293	03-09-89	NTMTDK	NOTE FOR MOTION DOCKET	03-17-89	
		ACTION	1:30/RILEY/MT FR DUAL JURY IMPNLMNT		
294	03-09-89	PREHRG	CR WILLIAM SULLIVAN		
		JDG25	JUDGE JOHN RILEY, DEPT 25		
2945	03-09-89	AFSRML	AFFIDAVIT OF SERVICE BY MAIL		
2946	03-09-89	NTOEX	NOTICE OF ORAL EXAM		
295	03-10-89	MT	MOTION	03-17-89	
		ACTION	1;30/MTN TO REQUEST PROD DOCS		
296	03-10-89	NTMTDK	NOTE FOR MOTION DOCKET		
297	03-10-89	AFML	AFFIDAVIT OF MAILING		
298	03-10-89	AFSRML	AFFIDAVIT OF SERVICE BY MAIL		
299	03-10-89	NTOEX	NOTICE OF ORAL EXAM		
2995	03-10-89	DCLR	DECLARATION OF ANTHONY SHAPIRO		
300	03-13-89	MM	MEMORANDUM/ALSKOG		
301	03-13-89	AFSR	AFFIDAVIT OF SERVICE		
302	03-13-89	NTOEX	NOTICE OF ORAL EXAM		
303	03-13-89	AFSRML	AFFIDAVIT OF SERVICE BY MAIL		
3035	03-13-89	AFML	AFFIDAVIT OF MAILING		
3036	03-14-89	NTWDA	NOTICE OF WITHDRAWAL OF ATTORNEY		
304	03-15-89	MTDSM	MOTION TO DISMISS	03-17-89	
		ACTION	1:30/MTN TO DISMISS		
305	03-15-89	MT	MOTION	03-17-89	
		ACTION	1:30/MTN FOR ORD SHORT TIME RE MTN		
		ACTION	TO DISMISS		
306	03-15-89	NTMTDK	NOTE FOR MOTION DOCKET		
307	03-15-89	DCLR	DECLARATION OF ANTHONY D SHAPIRO		
308	03-15-89	AFSRML	AFFIDAVIT OF SERVICE BY MAIL		
309	03-15-89	NTOEX	NOTICE OF ORAL EXAM		
310	03-15-89	OB	OBJECTIONS TO MT FOR TRIAL DATE &		

CASE#: 86-2-18176-8 CIVIL JUDGMENT# YES
 TITLE: BUTLER ET VIR ETAL VS BARNETT ETUX ETANO

JUDGE ID: 025

-----APPEARANCE DOCKET-----

SUB#	DATE	CD/CONN	DESCRIPTION	SECONDARY	MICROFILM
311	03-15-89	BR	DUAL JURY IMPANELMENT/BARNETT'S BRIEF/BARNETT'S		
312	03-15-89	RSP	RESPONSE TO MT OF DEF ALSKOG		
3125	03-15-89	MM	MEMORANDUM		
313	03-16-89	WL	ADDTL WITNESS LIST/COM CHAPEL BIBLE		
314	03-16-89	BR	REPLY BRIEF IN SUP OF MT/COM CHAPEL		
3145	03-16-89	MTC	MOTION TO CONTINUE		
315	03-17-89	MT	MTN FOR CLARIFICATION CUT-OFF DATES		
316	03-17-89	NTMDLF	NOTE FOR MOTION DOCKET-LATE FILING MTN FOR CLARIFICATION & MODIF	03-17-89	
317	03-17-89	WL	WITNESS LIST/ADDL		
318	03-17-89	AN	ANSWER HOWERTONS		
319	03-17-89	NTOEX	NOTICE OF ORAL EXAM BEFORE TRIAL		
320	03-17-89	PREHRG JDG25	CR PETER HUNT JUDGE JOHN RILEY, DEPT 25		
321	03-17-89	PORD	PROTECTIVE ORDER		
322	03-17-89	OR	ORDER GRANT SHORTEN TIME FOR RESPONSE		
323	03-17-89	ORCD	ORDER COMPELLING DISCOVERY		
324	03-17-89	MT	MOTION FOR		
325	03-17-89	ORDSM	ORDER OF DISMISSAL VS DONALD HALL (NUNC PRO TUNC 09-16-87)		
326	03-17-89	AF	AFFIDAVIT OF CHRISTINE HALL		
327	03-17-89	ORCNS	ORDER CONSOLIDATING CASES		
328	03-20-89	AFSRML	AFFIDAVIT OF SERVICE BY MAIL		
329	03-23-89	WL	WITNESS LIST-ADDTL COMM CHAPEL		
330	03-23-89	AFSR	AFFIDAVIT OF SERVICE		
331	03-23-89	RQPD	REQUEST FOR PRODUCTION OF DOCUMENTS		
3315	03-24-89	LTR	LETTER		
332	03-27-89	BR	BRIEF FOR PARTIAL SUMM JUDGMENT		
333	03-27-89	MTSMJG	MOTION FOR SUMMARY JUDGMENT		
334	03-27-89	NTMTDK	NOTE FOR MOTION DOCKET		
3345	03-29-89	NT	NT/COMMUNITY CHAPEL'S POSTHRG BRIEF		
335	03-30-89	MM	MEMORANDUM JORGENSEN SUPPL IN OPPO MOTIONS TO DISMISS		
336	03-30-89	AFSRML	AFFIDAVIT OF SERVICE BY MAIL		
337	03-30-89	CRRSP	CORRESPONDENCE RE DEPOSITION		
338	03-30-89	CRRSP	CORRESPONDENCE RE DEPOSITION		
339	03-30-89	AFSR	AFFIDAVIT OF SERVICE		
340	03-30-89	AFSRML	AFFIDAVIT OF SERVICE BY MAIL		
341	03-30-89	SBDT	SUBPOENA DUCES TECUM		
342	03-30-89	NTOEX	NOTICE OF ORAL EXAM		
3425	03-30-89	CRRSP	CORRESPONDENCE		
3426	03-31-89	PREHRG JDG25	CR PETER HUNT JUDGE JOHN RILEY, DEPT 25		
-	04-03-89	§STA	SEE TRUST ACCOUNT		
343	04-03-89	NTMDLF	NOTE FOR MOTION DOCKET-LATE FILING MTN TO ADD WITNESSES	04-07-89	
344	04-03-89	MT	MOTION TO ADD FIVE ADDTNL WITNESSES		
345	04-03-89	DCLR	DECLARATION R ROHAN IN SPPT ADDTL WITNESSES		

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JUDGE ID: 025

-----APPEARANCE DOCKET-----

SUB#	DATE	CD/CONN	DESCRIPTION	SECONDARY MICROFILM
346	04-04-89	NTOEX	NOTICE OF ORAL EXAM	
347	04-04-89	AFSRML	AFFIDAVIT OF SERVICE BY MAIL	
3474	04-04-89	OR	ORD RE TERMS & CONFIRM TRIAL	
3475	04-05-89	NT	NOTICE OF CONTENTIONS OF FACT & LAW	
348	04-06-89	AFSRML	AFFIDAVIT OF SERVICE BY MAIL	
349	04-06-89	NTD	NOTICE OF DEPOSITION OF DAVID VOISS	
350	04-06-89	NTD	NOTICE OF DEPOSITION OF R STARK	
351	04-06-89	NTD	NOTICE OF DEPOSITION OF R ZERBE	
352	04-06-89	CRRSP	CORRESPONDENCE	
353	04-06-89	DCLR	DECLARATION OF SUSAN D JONES	
354	04-06-89	AFSR	AFFIDAVIT OF SERVICE BY MAIL	
355	04-07-89	PREHRG	CR JERRY TREGO	
		JDG25	JUDGE JOHN RILEY, DEPT 25	
356	04-07-89	NTOEX	NOTICE OF ORAL EXAM	
357	04-10-89	NTOEX	NOTICE OF ORAL EXAM	
358	04-10-89	AFSRML	AFFIDAVIT OF SERVICE BY MAIL	
359	04-11-89	LTRT	LETTER OF TRANSMITTAL	
360	04-13-89	MT	MOTION FOR RECONSIDERATION OF MEMORANDUM ORDER DATED	
361	04-13-89	NT	NOTICE OF MOTION TO RECONSIDER MEMORANDUM ORDER DATED	
3615	04-13-89	MM	MEMORANDUM IN SUPP SANCTIONS	
3616	04-13-89	MM	MEMORANDUM IN SUPP RECONSIDERATION	
3617	04-13-89	OR	ORDER ADD WITNESSES & EXTEND CUTOFF	
362	04-13-89	MT	MOTION FOR SANCTIONS AGAINST COUNSEL	
3625	04-13-89	AFSRML	AFFIDAVIT OF SERVICE BY MAIL	
363	04-13-89	NT	NOTICE OF MOTION FOR SANCTIONS AGAINST COUNSEL	
3635	04-14-89	AFML	AFFIDAVIT OF MAILING	
3636	04-14-89	NTOEX	NOTICE OF ORAL EXAM	
3637	04-14-89	JN	JOINDER IN SUMM JUDGMNT MOTIONS	
364	04-17-89	PT	PETITION FOR APPROVAL OF MINOR SETTLEMENT/GAL	
365	04-17-89	OR	ORDER APPROVING MINOR SETTLEMENT	
366	04-17-89	DCLR	DECLARATION OF JEFFERY M CAMPICHE	
367	04-17-89	MT	1:30/RILEY/MT FR CHANGE OF VENUE	04-28-89
368	04-17-89	NTMTDK	NOTE FOR MOTION DOCKET	
3684	04-17-89	MM	MEMORANDUM IN SUPPORT OF MOTION/DEF	
3685	04-17-89	ST	STATEMENT - CONTENTIONS OF FACTS AND LAW/COMMUNITY CHAPEL	
3686	04-17-89	AF	AFFIDAVIT OF RODNEY HOLLENDBECK	
369	04-18-89	MTSMJG	MOTION FOR SUMMARY JUDGMENT	
370	04-18-89	AF	AFFIDAVIT OF BRUCE WINCHELL	
371	04-24-89	AF	AFFIDAVIT C SHAFFER IN OPPO SMJG	
372	04-24-89	NTMTDK	NOTE FOR MOTION DOCKET	05-12-89SJ
		ACTION	MTN FOR SUMMARY JUDGMENT-PLA	
-	04-24-89	NOTE	P ATTY-CC NONE	05-12-89SJ
-	04-24-89	NOTE	D ATTY-C NONE	05-12-89SJ
373	04-24-89	DCLR	DECLARATION OF SUSAN D JONES	
374	04-24-89	MM	MEMORANDUM/PLA/MTN FOR CHANGE VENUE	

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-----APPEARANCE DOCKET-----

SUB#	DATE	CD/CONN	DESCRIPTION	SECONDARY	MICROFILM
375	04-24-89	MM	MEMO IN OPPO RE SUMM JUDG/MAUREEN P		
376	04-24-89	AF	AFFIDAVIT OF SUSAN D JONES		
377	04-24-89	MM	MEMORANDUM / JORGENSEN		
378	04-24-89	MM	MEMO IN OPPO RE 1ST SUMM JUDG/PLA		
379	04-25-89	MM	MEMORANDUM/PLA/RE PARTIAL SUMM JUDG		
380	04-25-89	AF	AFFIDAVIT OF SUSAN D JONES		
381	04-26-89	AFSR	AFFIDAVIT OF SERVICE		
382	04-26-89	AFSR	AFFIDAVIT OF SERVICE		
383	04-26-89	AFSR	AFFIDAVIT OF SERVICE		
384	04-26-89	AFSR	AFFIDAVIT OF SERVICE		
385	04-26-89	AFSR	AFFIDAVIT OF SERVICE		
386	04-26-89	AF	AFFIDAVIT RE RELIGIOUS BELIEFS WITH EXHIBITS 1 & 2 ATTACHED/D BARNETT		
387	04-26-89	MM	MEMORANDUM IN OPPOSITION TO CHAPELS MTN FOR PARTIAL SUMM JDGMT RE COLLATERAL ESTOPEL/JORGENSEN		
388	04-26-89	AF	AFFIDAVIT IN OPPOSITION TO MOTION /SUSAN DELANTY JONES		
389	04-26-89	MM	MEMORANDUM OPPOSING THIRD SUMM JDGMT MOTION/PLA		
390	04-26-89	AF	AFFIDAVIT IN OPPOSITION TO SUMM JDGMT/CATHERINE D SHAFFER		
391	04-26-89	AF	AFFIDAVIT IN SUPPT OF PARTIAL SUMM JDGMT/DON BARNETT		
392	04-26-89	MM	MEMORANDUM/REPLY IN SUPPORT OF SUMM JDGMT MOTION/DEF BARNETT		
3925	04-26-89	AFSRML	AFFIDAVIT OF SERVICE BY MAIL		
393	04-27-89	JN	JOINER IN MT TO STRIKE AFFIDAVITS		
394	04-27-89	RPY	REPLY BRIEF/BARNETT		
395	04-26-89	MTSMJG	MOTION FOR SUMMARY JUDGMENT		
3955	04-28-89	MM	MEMO IN RESPONSE TO MTN FOR CHANGE OF VENUE		
3956	04-28-89	ORDYMT	ORDER DENYING MOTION CHANGE VENUE		
3957	04-28-89	NTD	NOTICE OF DEPOSITION		
3958	04-28-89	PREHRG JDG25	CR GARY CRAWFORD JUDGE JOHN RILEY, DEPT 25		
396	05-01-89	AF	AFFIDAVIT OF DAVID G KNIBB		
397	05-01-89	MTL	MOTION IN LIMINE RE TESTIMONY		
398	05-01-89	MTL	JOINT MTNS IN LIMINE		
399	05-01-89	AFSRML	AFFIDAVIT OF SERVICE BY MAIL		
400	05-01-89	AFSRML	AFFIDAVIT OF SERVICE BY MAIL		
401	05-01-89	NT	NOTICE OF ATTENDANCE AT TRIAL		
4011	05-02-89	ORDSM	ORDER OF DISMISSAL VS BROWN ETAL		
4012	05-02-89	ORDSM	ORDER OF DISMISSAL VS HALL		
4013	05-02-89	ORDSM	ORDER OF DISMISSAL VS BUTLER ETUX ETAL		
4014	05-02-89	BR	BRIEF BARNETT SUPPL RE CLAIMS		
4015	05-02-89	AFSR	AFFIDAVIT OF SERVICE		
4016	05-02-89	NTFD	NOTICE OF FILING DEPOSITION		
4017	05-02-89	NTFD	NOTICE OF FILING DEPOSITION		
402	05-03-89	MTL	MOTIONS IN LIMINE		

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-----APPEARANCE DOCKET-----

SUB#	DATE	CD/CONN	DESCRIPTION	SECONDARY	MICROFILM
403	05-02-89	NTMTDK	NOTE FOR MOTION DOCKET 10:30/COUNTR MTN FOR SUMM JGMT	05-12-89	
4035	05-02-89	PREHRG JDG25	CR GARY HAMILTON JUDGE JOHN RILEY, DEPT 25		
404	05-03-89	MT	MOTION	05-03-89	
		ACTION ACTION	4:30/RILEY/MT CONT TRIAL OR STAY PROC		
405	05-03-89	NTMDLF	NOTE FOR MOTION DOCKET-LATE FILING		
406	05-03-89	AF	AFFIDAVIT OF S D JONES		
407	05-03-89	AFSRML	AFFIDAVIT OF SERVICE BY MAIL		
408	05-03-89	AFSRML	AFFIDAVIT OF SERVICE BY MAIL		
409	05-03-89	EXLST	EXHIBIT LIST - JORGENSEN		
410	05-03-89	AFSRML	AFFIDAVIT OF SERVICE BY MAIL		
411	05-03-89	RPY	REPLY/COMMUNITY CHAPELS		
412	05-03-89	AF	AFFIDAVIT OF ANTHONY D SHAPIRO		
413	05-03-89	AF	AFFIDAVIT OF ANTHONY D SHAPIRO		
414	05-03-89	RPY	REPLY/COMMUNITY CHAPELS		
415	05-03-89	SB	SUBPOENA		
416	05-03-89	LTRT	LETTER OF TRANSMITTAL DEPOS		
417	05-04-89	MM	MEMORANDUM BARNETT IN OPPO RQ FOR CONTINUANCE OR STAY		
4175	05-04-89	AF	AFFIDAVIT OF R HOLLENBECK		
	05-05-89	AFSR	AFFIDAVIT OF SERVICE		
419	05-05-89	OB	OBJECTIONS TO MOTION FOR SUMM JDGMT ETC/DEFTS		
420	05-05-89	PREHRG JDG25	CR GARY HAMILTON JUDGE JOHN RILEY, DEPT 25		
421	05-10-89	NTFD	NOTICE OF FILING DEPOSITION		
422	05-22-89	RCP	RECEIPT/BLOCK ACCOUNT		
423	05-22-89	RCP	RECEIPT/BLOCK ACCOUNT		
424	05-25-89	PREHRG JDG25	CR GARY HAMILTON JUDGE JOHN RILEY, DEPT 25		
425	05-26-89	PRSMJ	PARTIAL SUMMARY JUDGMENT		
426	06-14-89	MTDSM	MOTION TO DISMISS	06-30-89	
		ACTION	8:30/RILEY/PRES OF MTN TO DISMISS		
427	06-14-89	NTMTDK	NOTE FOR MOTION DOCKET		
428	06-14-89	BR	BRIEF SPPT MTN TO DISMISS		
429	06-15-89	JN	JOINDER/COMMUNITY CHAPEL		
430	06-19-89	RSP	RESPONSE TO MTN TO DISMISS/ST PAUL FIRE & MARINE INS CO		
431	06-26-89	BR	BRIEF IN OPPOSITION TO MOTION TO DISMISS/GARY LIEN		
432	06-29-89	NTFD	NOTICE OF FILING DEPOSITION		
433	06-29-89	RPY	REPLY MEMO IN SPPT MOT TO DISMISS		
434	06-30-89	ORDSM	ORDER OF DISMISSAL VS ALL		
435	06-30-89	STP	STIPULATION FOR DISMISSAL		
436	07-26-89	MTDSM	MOTION TO DISMISS		
437	07-27-89	NACA	NOTICE OF APPEAL TO COURT OF APPEAL		
438	08-15-89	PNCA	PERFECTION NOTICE FROM CT OF APPLS #24572-4-I		
439	08-29-89	DSGCKP	DESIGNATION OF CLERK'S PAPERS		

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-----APPEARANCE DOCKET-----
SUB# DATE CD/CONN DESCRIPTION SECONDARY MICROFILM

440	08-30-89	CRRSP	CORESPNDNC RE INADQT CK'S DESIG 439	
-	10-25-89	VRPT	VERBATIM RPT TRANSMITTED 10-25-89 HRG OF 6-30-89	
441	12-01-89	DSGCKP	DESIGNATION OF CLERK'S PAPERS	
442	12-27-89	INX	INDEX TO CLERKS PAPERS	
-	01-18-90	\$CLPR	CLERK'S PAPERS - FEE RECEIVED	42.50
443	03-30-90	NTACA	NOTICE OF ATTY CHANGE OF ADDRESS	
444	11-20-90	MND	MANDATE #24572-4-I/AFFIRM	

-----END COPY CASE-----

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(Clerk's Date Stamp)

**SUPERIOR COURT OF WASHINGTON FOR
KING COUNTY**

KATHY LEE BUTLER, et ux, et al.,
Plaintiffs,

v.

DONALD LEE BARNETT, et ux, et al.,
Defendants.

86-2-18176 8

No. _____

SUMMONS
(20 days)

TO: Defendants above-named:

A lawsuit has been started against you in the above entitled court by Kathy Lee Butler, et ux, et al., plaintiff. Plaintiff's claim is stated in the written complaint, a copy of which is served upon you with this summons.

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

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

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

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

KARGIANIS & AUSTIN

By *George Kargianis*
Attorneys for plaintiff.
George Kargianis
47th Floor Columbia Center
701 Fifth Avenue
Seattle, Washington 98104-7010
624-5370

Dated: July 31, 1986

FILED
07-31-1986
1:53 P.m.
KING COUNTY SUPERIOR COURT
M. JANICE MICHELS
KING COUNTY CLERK
SEATTLE, WA.

86-2-18176-8

REG/RECEIPT #	TRAN-CODE	DOCKET-CODE
03-16362	1100	\$FFRC
PAID BY: KARGIANIS & AUSTIN		
TRANSACTION AMOUNT:		\$70.00

86 JUL 31 P 1 58

CLERK OF COURT
SEATTLE, WA

SUPERIOR COURT OF WASHINGTON FOR KING COUNTY

KATHY LEE BUTLER and STEPHEN)
LYNN BUTLER, wife and husband)
and the marital community)
composed thereof; and KATHY)
LEE BUTLER as guardian ad)
litem for SCOTT WILLIAM LIEN)
and RANDY WILLIAM LIEN, minors)
and SANDI LEE BROWN and LYLE)
DAVID BROWN, wife and husband)
and the marital community)
composed thereof; and DORA)
FELLHAUER as guardian ad litem)
for TARA LYNN BROWN and TROY)
STEVEN BROWN, minors; and)
CHRISTINE HALL, and DONALD T)
HALL, wife and husband and the)
marital community composed)
thereof,)

Plaintiffs,)

v.)

DONALD LEE BARNETT and BARBARA)
BARNETT, husband and wife, and)
the marital community composed)
thereof; COMMUNITY CHAPEL)
AND BIBLE TRAINING CENTER, a)
Washington corporation; and)
JANE AND JOHN DOES 1-5,)

Defendants.)

86-2-18176 8

NO.

COMPLAINT FOR MINISTERIAL
MALPRACTICE, OUTRAGE,
SEXUAL BATTERY, NEGLIGENT
COUNSELING, WRONGFUL DIS-
FELLOWSHIP, LOSS OF
CONSORTIUM, DEFAMATION, AND
LOSS OF PARENTAL
CONSORTIUM

COME NOW the plaintiffs, by and through their attorneys of
record, Kargianis & Austin and George Kargianis, and for cause of
action against the defendants state and allege as follows:

COMPLAINT

1 1. **Jurisdiction and Venue.** The court has jurisdiction
2 over the subject matter herein and the parties hereto. Venue is
3 properly had in King County, Washington.

4 2. **Plaintiffs.**

5 A. Kathy Lee Butler and Steven Lynn Butler are wife
6 and husband, and at all times material hereto plaintiffs were
7 residents of King County, Washington.

8 B. Sandi Lee Brown and Lyle David Brown are wife and
9 husband, and at all material times hereto, plaintiffs were
10 residents of King County, Washington.

11 C. Kathy Lee Butler is the duly appointed and
12 qualified guardian ad litem for the minor children Scott William
13 Lien and Randy William Lien, who at all times material hereto,
14 resided in King County, Washington.

15 D. Dora Fellhauer is the duly appointed and qualified
16 guardian ad litem for the minor children Tara Lynn Brown and Troy
17 Steven Brown, who at all times material hereto, resided in King
18 County, Washington.

19 E. Christine Hall and Donald R. Hall are wife and
20 husband and at all times material hereto plaintiffs were
21 residents of King County, Washington.

22 3. **Defendants.**

23 A. Donald Lee Barnett and Barbara Barnett are husband
24 and wife and are residents of King County, Washington. Donald
25 Lee Barnett is the head pastor of Community Chapel and Bible
26

1 Training Center, and as such, is responsible for the administra-
2 tion and direction of the entire congregation. All actions
3 described of the defendants, or either of them, were performed on
4 behalf of the marital community.

5 B. At all times material hereto, the defendants
6 Donald Lee Barnett and Barbara Barnett were principals, agents
7 employees and representatives of the Community Chapel and Bible
8 Training Center. All actions complained of herein were performed
9 in the scope of their representation, employment and/or agency
10 for Community Chapel and Bible Training Center.

11 C. Community Chapel and Bible Training Center
12 (hereinafter "CC&BTC") is a corporation licensed to do business
13 and doing business in the State of Washington, having its
14 principal of business at 18635 - 8th Ave S., Seattle, WA.

15 D. Jane and John Does 1-5 are residents of the State
16 of Washington. At all times material hereto Jane and John Does
17 1-5 were agents, employees and/or representatives of CC&BTC, and
18 all actions complained of herein were performed in the scope of
19 their representation, employment and/or agency for CC&BTC.

20 E. Sometime during the year of 1967, CC&BTC was
21 organized under the laws of the State of Washington as a corp-
22 oration, practicing fundamentalist pentacostal beliefs. Defendant
23 CC&BTC, by and through its pastor, Donald Lee Barnett, has
24 required members to establish strong "spiritual connections" with
25 other people. Specifically, members of defendant CC&BTC who are
26

1 married, are encouraged to establish strong "spiritual connec-
2 tions" with members of the opposite sex, without regard to the
3 members' spouses. Said "spiritual connections" include dancing
4 with other members' mates, longing looks into each others eyes,
5 and the giving up of one's mate to another.

6 F. Plaintiffs Butler, Brown, Lien and Hall were
7 members of the defendant CC&BTC religious organization.

8 G. At all times hereinafter mentioned defendant
9 Donald L. Barnett was engaged in pastoral counseling at the
10 defendant CC&BTC's principal place of business in the city of
11 Seattle, King County, where he kept and maintained an office in
12 connection with his pastoral duties and/or pastoral advice.

13 H. At all times hereinafter mentioned plaintiffs
14 Kathy Lee Butler, Sandi Brown and Christine Hall, as members of
15 defendant CC&BTC, came into constant contact with defendant
16 Donald L. Barnett. Defendant Donald L. Barnett frequently sought
17 out plaintiffs Butler, Brown and Hall in a purported effort to
18 provide them with ministerial counseling and pastoral advice.

19 I. During the month of May, 1980, plaintiff Brown was
20 in the presence of defendant Donald L. Barnett for the alleged
21 purpose of ministerial counseling and spiritual guidance. At that
22 time, defendant Donald L. Barnett, without any encouragement or
23 inducement by plaintiff Brown, forcibly laid his hands on plain-
24 tiff Brown's breasts and forcibly kissed and embraced her against
25 her will.

1 J. On other occasions, defendant Donald L. Barnett,
2 under the guise of providing ministerial services and counseling,
3 removed his clothing and exhibited his "private parts" to plain-
4 tiffs Butler and Hall. Defendant Barnett professed to be driven
5 by God and represented to plaintiffs Butler and Hall that his
6 conduct was sanctioned by God. Defendant Barnett attempted to
7 unduly influence and coerce plaintiffs Butler and Hall into
8 having sexual intercourse with him, making physical contact with
9 plaintiffs Butler and Hall.

10 K. The minor children Tara Lynn Brown and Troy Steven
11 Brown were members of the defendant CC&BTC. Their parents are
12 Sandi Lee and Lyle David Brown.

13 L. The minor children Scott William Lien and Randy
14 William Lien were members of the defendant CC&BTC. Their mother
15 is Kathy Lee Butler.

16 M. Plaintiff Christine Hall was a member of the
17 defendant CC&BTC.

18 N. Over a period of several years, defendant Donald
19 L. Barnett continued to seek out plaintiffs Butler, Brown and
20 Hall and, under the guise of ministerial counseling and pastoral
21 guidance, continued to sexually assault plaintiffs Butler, Brown
22 and Hall by forcibly laying his hands on plaintiffs Butler, Brown
23 and Hall's breasts and forcibly kissing and embracing them
24 against their will.

25 O. On numerous occasions, defendant Donald Lee
26

1 Barnett, under the guise of providing ministerial services,
2 advice, and counseling, became aware of the vulnerability of
3 plaintiffs Hall and Butler. Defendant Donald L. Barnett took
4 advantage of their weakness, need for support, reliance on the
5 pastor's trusted position to manipulate plaintiffs Brown, Butler
6 and Hall.

7 P. As a result of the manipulation by defendant
8 Donald L. Barnett, plaintiffs Hall and Butler were coerced and
9 unduly influenced into having sexual relationships with defendant
10 Donald L. Barnett. These relationships continued for a period of
11 years.

12 Q. Defendant Donald L. Barnett encouraged the members
13 of his congregation, including plaintiffs, to form intimate
14 attachments with members of the opposite sex as part of regular
15 services at CC&BTC. Defendant Donald L. Barnett expressly
16 encouraged married members of the congregation to form intimate
17 attachments with persons other than the spouses of the members.
18 These intimate attachments are known as "connections".

19 R. Defendant Donald Barnett represented, coerced and
20 unduly influenced plaintiffs Butler and Hall that it was morally
21 spiriually proper to have and engage in intimate sexual contact
22 with him. As a result of Donald L. Barnett's coercion, undue
23 influence, and abuse of his pastoral position, plaintiffs Butler
24 and Hall engaged in intimate sexual contact with Barnett.

25 S. After a period of time, plaintiffs Butler, Brown
26

1 and Hall realized that defendant Donald L. Barnett's conduct was
2 not sanctioned by God and was a ruse concocted by defendant
3 Donald L. Barnett in order to satisfy his gross sexual needs.

4 T. Plaintiff Brown confronted defendant Donald L.
5 Barnett with her belief that his conduct was not sanctioned by
6 God and constituted negligent ministerial counseling and abuse of
7 his pastoral position.

8 U. Defendant Donald L. Barnett continued to claim
9 that his conduct was sanctioned by God and that he was performing
10 ministerial functions under the direction of God, and that if
11 plaintiff Brown revealed his conduct with her to the congrega-
12 tion, defendant Donald L. Barnett would cause plaintiff Brown to
13 be disfellowshipped.

14 V. Plaintiff Brown did reveal defendant Donald L.
15 Barnett's wrongful conduct to certain elders of the CC&BTC. These
16 elders, who may be added to this complaint at a later date upon
17 leave to amend being granted, conspired to cover-up defendant
18 Barnett's wrongful abuse of his pastoral position.

19 W. Thereafter, defendant Donald L. Barnett caused
20 plaintiff Brown to be disfellowshipped from the defendant CC&BTC
21 and shunned by its members.

22 X. As a direct and proximate result of plaintiff
23 Brown being wrongfully disfellowshipped and shunned, plaintiffs
24 Tara L. Brown and Troy S. Brown were also disfellowshipped and
25 shunned by friends and classmates.

1 Y. As a result of defendant Donald Barnett's wrongful
2 conduct and abuse of pastoral position, plaintiffs Butler and
3 Hall were forced to leave the CC&BTC in order to avoid continued
4 mental and physical abuse.

5 Z. Plaintiffs Butler and Hall suffered destruction of
6 their marital and familial relationships as a direct result of
7 defendant Barnett's wrongful and abusive conduct.

8 AA. Plaintiffs Brown suffered a severe disruption of
9 their marriage and destruction of their familial relationships as
10 a direct result of defendant Barnett's wrongful and abusive
11 conduct.

12 BB. Plaintiffs Tara L. Brown and Troy S. Brown
13 suffered a destruction of their relationships with friends and
14 family members as a direct result of defendant Barnett's wrongful
15 and abusive conduct.

16 CC. Plaintiffs Scott William Lien and Randy William
17 Lien suffered a destruction of their relationships with friends
18 and family members as a direct result of defendant Barnett's
19 wrongful and abusive conduct.

20
21 **FIRST CAUSE OF ACTION: ASSAULT AND BATTERY**

22 A. Plaintiffs Kathy Butler, Sandi Brown and Christine
23 Hall repeat and reallege each and every allegation as previously
24 set forth in complaint as if fully set forth herein.

25 B. As a direct result of said assaults and batteries
26

1 Y. As a result of defendant Donald Barnett's wrongful
2 conduct and abuse of pastoral position, plaintiffs Butler and
3 Hall were forced to leave the CC&BTC in order to avoid continued
4 mental and physical abuse.

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6 their marital and familial relationships as a direct result of
7 defendant Barnett's wrongful and abusive conduct.

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9 their marriage and destruction of their familial relationships as
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14 family members as a direct result of defendant Barnett's wrongful
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19 wrongful and abusive conduct.

20
21 **FIRST CAUSE OF ACTION: ASSAULT AND BATTERY**

22 A. Plaintiffs Kathy Butler, Sandi Brown and Christine
23 Hall repeat and reallege each and every allegation as previously
24 set forth in complaint as if fully set forth herein.

25 B. As a direct result of said assaults and batteries
26

1 by defendant Donald L. Barnett, plaintiffs Butler, Brown and Hall
2 were greatly humiliated, shamed, and embarrassed, endured great
3 suffering of body and mind, and were, and still are, nervous and
4 distraught.

5
6 **SECOND CAUSE OF ACTION: OUTRAGE**

7 A. Plaintiffs repeat and reallege each and every
8 allegation as previously set forth in complaint as if fully set
9 forth herein.

10 B. The conduct of defendant Donald L. Barnett, as
11 agent and servant of defendant CC&BTC, in forcibly laying his
12 hands on plaintiffs Butler, Brown and Hall and forcibly kissing
13 them and embracing them against their will, was perpetrated so as
14 to intentionally inflict severe emotional distress upon plain-
15 tiffs, with knowledge that such distress was certain or substan-
16 tially certain to result from such outrageous conduct.

17 C. Such conduct was perpetrated by defendant Donald
18 L. Barnett with reckless and deliberate disregard of a higher
19 degree of probability that severe emotional distress would result
20 to plaintiffs, and such conduct constitutes the tort of outrage
21 in the State of Washington.

22 D. Such conduct by defendant Donald L. Barnett was
23 extreme, outrageous, and in violation of rudimentary public
24 policy.

25 E. The conduct of defendant Donald L. Barnett was
26

1 deliberate, willful, malicious, and calculated to inflict severe
2 emotional distress on plaintiffs.

3 F. As a direct and proximate result of defendant
4 Donald L. Barnett's outrageous conduct, plaintiffs suffered
5 severe emotional distress, were greatly humiliated, shamed, and
6 embarrassed, endured great suffering of body and mind, and are,
7 and still are, nervous and distraught.

8
9 **THIRD CAUSE OF ACTION: MINISTERIAL MALPRACTICE**

10 A. Plaintiffs repeat and reallege each and every
11 allegation as previously set forth in complaint as if fully set
12 forth herein.

13 B. The conduct of defendant Donald L. Barnett, as
14 hereinabove alleged, fell below the standard of care established
15 in the community for performance of pastoral and religious duties
16 of a pastor; that by his sometimes negligent, but more often
17 willful and wanton conduct, fraud-deceit-misrepresentation,
18 assaults, abandonment, low moral character, degenerate
19 tendencies, gross sexual proclivities, intentional infliction of
20 emotional distress, breach of trust, and general bad character,
21 evil tendencies, and reckless disregard exhibited against plain-
22 tiffs Butler, Brown and Hall the defendant Donald L. Barnett is
23 guilty of ministerial malpractice and abuse of pastoral position.

24 C. As a result of defendant Donald L. Barnett's
25
26

1 ministerial malpractice and abuse of pastoral position, plain-
2 tiffs Brown, Butler and Hall suffered serious and painful
3 injuries to their person as well as psychological and marital
4 pain and suffering.

5
6 **FOURTH CAUSE OF ACTION: COUNSELOR MALPRACTICE**

7 A. Plaintiffs repeat and reallege each and every
8 allegation as previously set forth in complaint as if fully set
9 forth herein.

10 B. Defendant Donald L. Barnett did not exercise the
11 degree of care, skill, diligence and knowledge commonly possessed
12 and exercised by a reasonable, careful and prudent counselor in
13 this jurisdiction by manipulating plaintiffs Butler, Brown and
14 Hall into sexual relationships. This intentional or reckless
15 failure constitutes the tort of counselor malpractice.

16
17 **FIFTH CAUSE OF ACTION: NEGLIGENT COUNSELING**

18 A. Plaintiffs repeat and reallege each and every
19 allegation as previously set forth in complaint as if fully set
20 forth herein.

21 B. Defendant Donald L. Barnett held himself out to
22 plaintiffs Butler, Brown and Hall as being capable of performing
23 marital counseling and spiritual counseling, which required the
24 skill of a person competent to counsel the plaintiffs in their
25 respective needs.

1 C. The defendant Donald L. Barnett was negligent in
2 counseling of plaintiffs Hall and Butler in that defendant failed
3 to exercise or possess that degree of skill, care, and learning
4 ordinarily exercised or possessed by the average qualified
5 counselor, taking into account the existing state of knowledge
6 and practice in the field of clergy, marital counseling and other
7 counseling professions.

8 D. Defendant Donald L. Barnett was negligent in the
9 following particulars: defendant Donald L. Barnett counseled,
10 represented coerced and unduly influenced plaintiffs Butler,
11 Brown and Hall that by allowing defendant Barnett to fondle their
12 breasts, kiss them, and/or exposing his private parts to them and
13 engage in other sexually intimate contact, that somehow such
14 conduct would allow plaintiffs to become pure and obtain
15 spiritual love and the possibility of complete unity with God.

16 E. Such purported counseling and representations of
17 defendant Donald L. Barnett is indefensible, has no counseling or
18 spiritual value whatsoever, and failed to meet that degree of
19 care and skill ordinarily employed by counselors and clergy in
20 similar circumstances in the same locality, or in similar
21 localities.

22 F. As a direct and proximate result of defendant
23 Donald L. Barnett's negligent counseling and ministerial advice,
24 each plaintiff suffered serious psychological and mental pain and
25 suffering as well as painful physical injuries to their persons.
26

1 **SIXTH CAUSE OF ACTION: WRONGFUL DISFELLOWSHIP**

2 A. Plaintiffs repeat and reallege each and every
3 allegation as previously set forth in complaint as if fully set
4 forth herein.

5 B. Defendant Donald L. Barnett threatened plaintiff
6 Brown that if she disclosed defendant's conduct in allowing him
7 to fondle her breasts and kiss her on the lips, that defendant
8 Donald L. Barnett would cause her and her family to be disfellow-
9 shipped from the defendant CC&BTC, and further, cause them to be
10 shunned by CC&BTC members.

11 C. Plaintiff Brown disclosed defendant Barnett's
12 wrongful conduct to defendant CC&BTC elders. The defendant
13 CC&BTC elders, however, sanctioned defendant Barnett's conduct
14 and disfellowshipped plaintiffs Butler, Brown and Hall after
15 being directed by defendant Barnett to do so.

16 D. As a result of plaintiffs wrongful disfellowship,
17 the plaintiff Brown and her family have been shunned by members
18 of the CC&BTC and have been greatly humiliated, shamed, and
19 embarrassed, endured great suffering of body and mind, and are,
20 and still are nervous and distraught.

21
22 **SEVENTH CAUSE OF ACTION: RESPONDEAT SUPERIOR**

23 A. Plaintiffs repeat and reallege each and every
24 allegation as previously set forth in complaint as if fully set
25 forth herein.

1 B. At all times material to the allegations set forth
2 in this complaint, defendants were the agents, employees or
3 servants of defendant CC&BTC.

4 C. The defendant CC&BTC had knowledge of defendants
5 conduct towards the plaintiffs, and failed to take corrective
6 action, sanctions, preventive measures, or in any way attempt to
7 prevent Donald L. Barnett's conduct.

8 D. Defendants were acting in the scope of their
9 employment or agency with defendant CC&BTC, and, therefore,
10 defendant CC&BTC is legally responsible for acts and conduct
11 committed by defendants upon the persons of plaintiffs.

12 E. Under the doctrine of respondeat superior,
13 defendant CC&BTC is liable in damages to the plaintiffs for the
14 wrongful acts committed by defendant Donald L. Barnett and others
15 upon plaintiffs' persons.

16
17 **EIGHTH CAUSE OF ACTION:**

18 **INFLECTION OF EMOTIONAL DISTRESS**

19 A. Plaintiffs repeat and reallege each and every
20 allegation as previously set forth in complaint as if fully set
21 forth herein.

22 B. Plaintiffs Tara Lynn Brown, Troy Steven Brown,
23 Scott William Lien and Randy William Lien, minors, were members
24 of the CC&BTC and regularly attended services, classes and other
25
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1 functions of the CC&BTC for several years. During these plain-
2 tiffs involvement in and with the CC&BTC, plaintiffs were sub-
3 jected to numerous repetitive sermons, submission practices,
4 indoctrination, retreats, counseling sessions and psychological
5 techniques that were designed to and did diminish their cognitive
6 functions to discern truth from falsity and to make plaintiff
7 minors psychologically dependent upon the defendant CC&BTC,
8 defendant Donald L. Barnett and defendants Jane and John Does
9 1-5.

10 C. The defendants wrongful conduct in diminishing
11 plaintiff minors' cognitive functions proximately resulting in
12 the above-referenced harm was extremely atrocious, intolerable
13 and unacceptable in a civilized society.

14 D. The defendants wrongful conduct were intentional,
15 wilfull, wanton and malicious and defendants knew or should have
16 known that they would have the effects herein alleged.

17 E. The wrongful conduct of the defendants directly
18 and proximately caused the plaintiff minors to experience
19 psychological and mental disorders, severe marital distress,
20 anguish and caused them to be extremely nervous, excitable and
21 fearful. Further, defendants' conduct proximately caused plain-
22 tiff minors to experience extreme family disharmony.

23
24 **NINTH CAUSE OF ACTION: LOSS OF CONSORTIUM**

25 A. Plaintiffs repeat and reallege each and every
26

1 allegation as previously set forth in complaint as if fully set
2 forth herein.

3 B. As a further direct and proximate result of the
4 acts of defendants, plaintiffs Butler and Brown have suffered a
5 loss of consortium, including without limitation thereto, the
6 loss of love, affection, care, services, companionship and
7 society of each of their respective spouses.

8
9 **TENTH CAUSE OF ACTION: LOSS OF PARENTAL CONSORTIUM**

10 A. Plaintiffs minors Brown and Lien repeat and
11 reallege each and every allegation as previously set forth in
12 complaint as if fully set forth herein.

13 B. As a further direct and proximate result of the
14 acts of defendants, plaintiff minors Brown and Lien have suffered
15 a loss of parental consortium, including without limitation
16 thereto, the loss of their parents' love, care, companionship,
17 society and guidance.

18
19 **ELEVENTH CAUSE OF ACTION: DEFAMATION**

20 A. Plaintiffs minors Brown and Lien repeat and
21 reallege each and every allegation as previously set forth in
22 complaint as if fully set forth herein.

23 B. Upon information and belief, defendant Donald L.
24 Barnett, John Does 1-5 and Jane Does 1-5 made disparaging and
25 untrue statements to members of the CC&BTC regarding plaintiffs.

1 C. Defendants knew, or in the exercise of reasonable
2 care, should have known that the statements were false.

3 D. As a direct result of defendants' disparaging and
4 false statements, plaintiffs suffered injury to their reputa-
5 tions, wounded feelings, humiliation, and other damages subject
6 to proof.

7
8 **TWELFTH CAUSE OF ACTION: DAMAGES**

9 A. As a direct and proximate result of the inten-
10 tional, reckless, and negligent wrongful acts and omissions of
11 the defendants, and each of them, plaintiffs have suffered
12 serious and painful injuries to their person, as well as psycho-
13 logical and mental pain and suffering. By reason of the fore-
14 going, plaintiffs sustained general damages according to proof.

15 B. As a direct and proximate result of the inten-
16 tional, reckless, and negligent wrongful acts and omissions of
17 the defendants, and each of them, plaintiffs were required to and
18 did incur reasonable and necessary expenses in connection with
19 the treatment of said personal injuries. By reason of the fore-
20 going, plaintiffs sustained special damages according to proof.

21 C. As a direct and proximate result of the inten-
22 tional, reckless, and negligent wrongful acts and omissions of
23 the defendants, and each of them, plaintiffs will be required to
24 incue, and incur in the future, reasonable and necessary expenses
25 in connection with the treatment of said personal injuries. By
26

1 reason of the foregoing, plaintiffs will sustain additional
2 special damages according to proof.

3 D. As a direct and proximate result of the inten-
4 tional, reckless, and negligent wrongful acts and omissions of
5 the defendants, and each of them, plaintiffs have suffered a loss
6 of earnings to date in an amount which is presently unknown, but
7 which will be proven at the time of trial.

8 E. As a direct and proximate result of the inten-
9 tional, reckless, and negligent wrongful acts and omissions of
10 the defendants, and each of them, plaintiffs are entitled to
11 actual damages, damages for continuing pain and suffering and
12 attorneys' fees.

13
14 WHEREFORE, plaintiffs pray for judgement against defendants
15 individually and as marital community as follows:

16 1. For general damages already incurred and future general
17 damages in an amount unknown but which will be proved at the time
18 of trial;

19 2. For medical expenses incurred and for future medical
20 expenses and other costs, in an amount unknown which will be
21 proved at the time of trial;

22 3. For loss of wages and earnings which will be proved at
23 the time of trial;

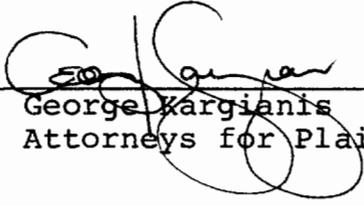
24 4. For damages for loss of consortium and parental con-
25 sortium;

26
COMPLAINT /18

- 1 5. For costs and disbursements;
2 6. For prejudgment interest;
3 7. For reasonable attorneys' fees;
4 8. For such other relief as may be jsut and equitable in
5 the premises.

6 DATED this 31st day of July, 1986.

7 KARGIANIS & AUSTIN

8
9 By 
10 George Kargianis
11 Attorneys for Plaintiffs

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26 COMPLAINT /19

JEG/ljs
7/30/86

RECEIVED
In King County Superior Court Clerk's Office
JUL 31 1986
Cashier Section
Superior Court Clerk

FILED
JUL 31 1986
2:58 PM

SUPERIOR COURT OF WASHINGTON FOR KING COUNTY

KATHY LEE BUTLER and STEVEN L. BUTLER, wife and husband, and the marital community composed thereof; and KATHY BUTLER as guardian ad litem for SCOTT WILLIAM LIEN and RANDY WILLIAM LIEN, minors; and SANDI LEE BROWN and LYLE DAVID BROWN, wife and husband, and the marital community composed thereof; and DORA FELLHAUER as guardian ad litem for TARA LYNN BROWN and TROY STEVEN BROWN, minors; and CHRISTINE KATHY HALL and DONALD T. HALL, wife and husband, and the marital community composed thereof,

Plaintiffs,

v.

DONALD LEE BARNETT and BARBARA BARNETT, husband and wife, and the marital community composed thereof, and the COMMUNITY CHAPEL AND BIBLE TRAINING CENTER, a Washington corporation,

Defendants.

86-2-18176 8
NO.

PETITION FOR APPOINTMENT OF GUARDIAN AD LITEM

COMES NOW KATHY LEE BUTLER, petitioner herein, and respectfully shows the court as follows:

1. That SCOTT WILLIAM LIEN, is a minor child, born in 1971.

PETITION FOR APPOINTMENT OF GUARDIAN AD LITEM

LAW OFFICES
KARGIANIS & AUSTIN
47TH FLOOR COLUMBIA CENTER
701 FIFTH AVENUE
SEATTLE, WASHINGTON 98104 7010
(206) 624-5370

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JEG/lis
7/30/86

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In King County Superior Court Clerk's Office
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SUPERIOR COURT OF WASHINGTON FOR KING COUNTY

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Plaintiffs,

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Defendants.

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PETITION FOR APPOINTMENT OF GUARDIAN AD LITEM

COMES NOW KATHY LEE BUTLER, petitioner herein, and respectfully shows the court as follows:

1. That SCOTT WILLIAM LIEN, is a minor child, born in 1971.

PETITION FOR APPOINTMENT OF GUARDIAN AD LITEM

LAW OFFICES
KARGIANIS & AUSTIN
47TH FLOOR COLUMBIA CENTER
701 FIFTH AVENUE
SEATTLE, WASHINGTON 98104 7010
(206) 624-5370

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JUL 31 1986
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SUPERIOR COURT OF WASHINGTON FOR KING COUNTY

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6 KATHY LEE BUTLER and STEVEN L.)
7 BUTLER, wife and husband, and)
8 the marital community composed)
9 thereof; and KATHY BUTLER as)
10 guardian ad litem for SCOTT)
11 WILLIAM LIEN and RANDY WILLIAM)
12 LIEN, minors; and SANDI LEE)
13 BROWN and LYLE DAVID BROWN,)
14 wife and husband, and the)
15 marital community composed)
16 thereof; and DORA FELLHAUER)
17 as guardian ad litem for TARA)
18 LYNN BROWN and TROY STEVEN)
19 BROWN, minors; and CHRISTINE)
20 KATHY HALL and DONALD T. HALL,)
21 wife and husband, and the)
22 marital community composed)
23 thereof,)

Plaintiffs,)

18 DONALD LEE BARNETT and BARBARA)
19 BARNETT, husband and wife, and)
20 the marital community composed)
21 thereof, and the COMMUNITY)
22 CHAPEL AND BIBLE TRAINING CENTER,)
23 a Washington corporation,)

Defendants.)

86-2-18176 8
NO.

ORDER APPOINTING
GUARDIAN AD LITEM

23 THIS MATTER having come on regularly before the above-entitled
24 court on the petition of KATHY LEE BUTLER for the appointment of

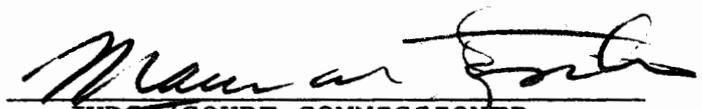
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26 ORDER APPOINTING
GUARDIAN AD LITEM

3

1 a guardian ad litem for SCOTT WILLIAM LIEN, a minor 15 years of
2 age; and it appearing to the court that SCOTT WILLIAM LIEN, is a
3 minor and without a guardian ad litem; that said minor has a good
4 cause of action against the defendants above-named, and it further
5 appearing that KATHY LEE BUTLER is a fit and proper person to be
6 appointed guardian ad litem for said minor for the purpose of
7 bringing said cause of action on his behalf; NOW, THEREFORE, it
8 is hereby,

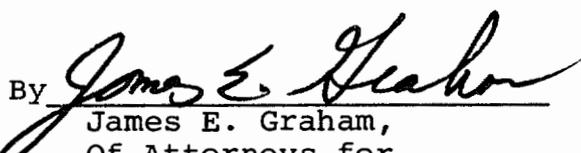
9 ORDERED that KATHY LEE BUTLER, and she hereby is, appointed
10 guardian ad litem for SCOTT WILLIAM LIEN, a minor, to bring said
11 action against defendants above-named on his behalf.

12 DONE IN OPEN COURT this 31 day of July, 1986.

13
14 
15 JUDGE/COURT COMMISSIONER

16 Presented by:

17 KARGIANIS & AUSTIN

18
19 By 
20 James E. Graham,
21 Of Attorneys for
22 Defendants

23
24
25
26 ORDER APPOINTING
GUARDIAN AD LITEM /2

LAW OFFICES
KARGIANIS & AUSTIN
47TH FLOOR COLUMBIA CENTER
701 FIFTH AVENUE
SEATTLE WASHINGTON 98104 7010
(206) 624 5370

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7/30/86

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Superior Court Clerk

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KING COUNTY SUPERIOR COURT CLERK'S OFFICE

SUPERIOR COURT OF WASHINGTON FOR KING COUNTY

KATHY LEE BUTLER and STEVEN L. BUTLER, wife and husband, and the marital community composed thereof; and KATHY BUTLER as guardian ad litem for SCOTT WILLIAM LIEN and RANDY WILLIAM LIEN, minors; and SANDI LEE BROWN and LYLE DAVID BROWN, wife and husband, and the marital community composed thereof; and DORA FELLHAUER as guardian ad litem for TARA LYNN BROWN and TROY STEVEN BROWN, minors; and CHRISTINE KATHY HALL and DONALD T. HALL, wife and husband, and the marital community composed thereof,

Plaintiffs,

v.

DONALD LEE BARNETT and BARBARA BARNETT, husband and wife, and the marital community composed thereof, and the COMMUNITY CHAPEL AND BIBLE TRAINING CENTER, a Washington corporation,

Defendants.

86-2-18176 8

CONSENT TO ACT AS
GUARDIAN AD LITEM

I, KATHY LEE BUTLER, hereby consent to act as guardian ad litem for SCOTT WILLIAM LIEN, a minor, in the above-entitled action.

DATED this 30 day of July, 1986.

Kathy Lee Butler
KATHY LEE BUTLER

4

CONSENT TO ACT AS
GUARDIAN AD LITEM

LAW OFFICES
KARGIANIS & AUSTIN
47TH FLOOR COLUMBIA CENTER
701 FIFTH AVENUE
SEATTLE WASHINGTON 98104-7010
(206) 624 5370

1 STATE OF WASHINGTON)
2 COUNTY OF KING) ss.

3 KATHY LEE BUTLER, being first duly sworn, upon oath deposes
4 and states as follows:

5 That she is the natural mother of SCOTT WILLIAM LIEN, and has
6 agreed to act as guardian ad litem herein; that she has read the
7 foregoing CONSENT TO ACT AS GUARDIAN AD LITEM; that she knows the
8 contents thereof and believes the same to be true.

9
10 Kathy Lee Butler
KATHY LEE BUTLER

11 SUBSCRIBED AND SWORN to before me this 30th day of July,
12 1986.

13
14 Linda L. Suggen
NOTARY PUBLIC in and for the
15 State of Washington residing
at Burien.

16 My commission expires: 3-8-88.

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CONSENT TO ACT AS
GUARDIAN AD LITEM /2

LAW OFFICES
KARGIANIS & AUSTIN
47TH FLOOR COLUMBIA CENTER
701 FIFTH AVENUE
SEATTLE WASHINGTON 98104 7010
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SEATTLE, WASHINGTON

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SUPERIOR COURT OF WASHINGTON FOR KING COUNTY

KATHY LEE BUTLER and STEVEN L.)
BUTLER, wife and husband, and)
the marital community composed)
thereof; and KATHY BUTLER as)
guardian ad litem for SCOTT)
WILLIAM LIEN and RANDY WILLIAM)
LIEN, minors; and SANDI LEE)
BROWN and LYLE DAVID BROWN,)
wife and husband, and the)
marital community composed)
thereof; and DORA FELLHAUER)
as guardian ad litem for TARA)
LYNN BROWN and TROY STEVEN)
BROWN, minors; and CHRISTINE)
KATHY HALL and DONALD T. HALL,)
wife and husband, and the)
marital community composed)
thereof,)

Plaintiffs,)

v.)

DONALD LEE BARNETT and BARBARA)
BARNETT, husband and wife, and)
the marital community composed)
thereof, and the COMMUNITY)
CHAPEL AND BIBLE TRAINING CENTER,)
a Washington corporation,)

Defendants.)

NO. 86-2-18176 8

PETITION FOR APPOINTMENT
AS GUARDIAN AD LITEM

COMES NOW, DORA FELLHAUER, petitioner herein, and respectfully
shows the court as follows:

1. That TARA LYNN BROWN, is a minor child, born in 1969.

PETITION FOR APPOINTMENT
AS GUARDIAN AD LITEM

LAW OFFICES
KARGIANIS & AUSTIN
47TH FLOOR COLUMBIA CENTER
701 FIFTH AVENUE
SEATTLE, WASHINGTON 98104-7010
(206) 624-5370

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SEATTLE, WASH.

31 1986

Court Clerk
Superior Court Clerk

SUPERIOR COURT OF WASHINGTON FOR KING COUNTY

KATHY LEE BUTLER and STEVEN L. BUTLER, wife and husband, and the marital community composed thereof; and KATHY BUTLER as guardian ad litem for SCOTT WILLIAM LIEN and RANDY WILLIAM LIEN, minors; and SANDI LEE BROWN and LYLE DAVID BROWN, wife and husband, and the marital community composed thereof; and DORA FELLHAUER as guardian ad litem for TARA LYNN BROWN and TROY STEVEN BROWN, minors; and CHRISTINE KATHY HALL and DONALD T. HALL, wife and husband, and the marital community composed thereof,

Plaintiffs,

v.

DONALD LEE BARNETT and BARBARA BARNETT, husband and wife, and the marital community composed thereof, and the COMMUNITY CHAPEL AND BIBLE TRAINING CENTER, a Washington corporation,

Defendants.

86^{No}-2-18176 8
ORDER APPOINTING
GUARDIAN AD LITEM

THIS MATTER having come on regularly before the above-entitled court on the petition of DORA FELLHAUER for the appointment of

ORDER APPOINTING
GUARDIAN AD LITEM

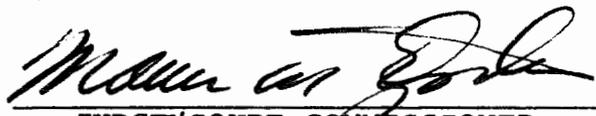
LAW OFFICES
KARGIANIS & AUSTIN
47TH FLOOR COLUMBIA CENTER
701 FIFTH AVENUE
SEATTLE, WASHINGTON 98104-7010
(206) 624-5370

6

1 a guardian ad litem for TARA LYNN BROWN, a minor 17 years of
2 age; and it appearing to the court that TARA LYNN BROWN is a
3 minor and without a guardian ad litem; that said minor has a good
4 cause of action against the defendants above-named, and it further
5 appearing that DORA FELLHAUER is a fit and proper person to be
6 appointed guardian ad litem for said minor for the purpose of
7 bringing said cause of action on his behalf; NOW, THEREFORE, it
8 is hereby,

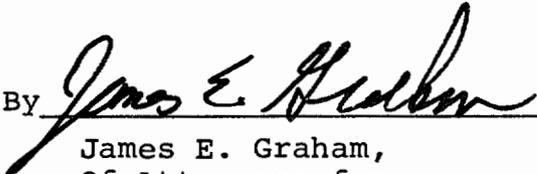
9 ORDERED that DORA FELLHAUER, and she hereby is, appointed
10 guardian ad litem for TARA LYNN BROWN, a minor, to bring said
11 action against defendants above-named on her behalf.

12 DONE IN OPEN COURT this 31 day of July, 1986.

13
14 
15 JUDGE/COURT COMMISSIONER

16 Presented by:

17 KARGIANIS & AUSTIN

18
19 BY 

20 James E. Graham,
21 Of Attorneys for
22 Defendants

23
24
25
26 ORDER APPOINTING
GUARDIAN AD LITEM /2

LAW OFFICES
KARGIANIS & AUSTIN
47TH FLOOR COLUMBIA CENTER
701 FIFTH AVENUE
SEATTLE, WASHINGTON 98104-7010
(206) 624-5370

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SEATTLE, WASHINGTON

SUPERIOR COURT OF WASHINGTON FOR KING COUNTY

KATHY LEE BUTLER and STEVEN L. BUTLER, wife and husband, and the marital community composed thereof; and KATHY BUTLER as guardian ad litem for SCOTT WILLIAM LIEN and RANDY WILLIAM LIEN, minors; and SANDI LEE BROWN and LYLE DAVID BROWN, wife and husband, and the marital community composed thereof; and DORA FELLHAUER as guardian ad litem for TARA LYNN BROWN and TROY STEVEN BROWN, minors; and CHRISTINE KATHY HALL and DONALD T. HALL, wife and husband, and the marital community composed thereof,

Plaintiffs,

v.

DONALD LEE BARNETT and BARBARA BARNETT, husband and wife, and the marital community composed thereof, and the COMMUNITY CHAPEL AND BIBLE TRAINING CENTER, a Washington corporation,

Defendants.

86-2-18176 8

NO.

CONSENT TO ACT AS
GUARDIAN AD LITEM

I, DORA FELLHAUER, hereby consent to act as guardian ad litem for TARA LYNN BROWN, a minor, in the above-entitled action.

DATED this 30 day of July, 1986.

Dora Fellhauer
DORA FELLHAUER

CONSENT TO ACT AS
GUARDIAN AD LITEM

LAW OFFICES
KARGIANIS & AUSTIN
47TH FLOOR COLUMBIA CENTER
701 FIFTH AVENUE
SEATTLE, WASHINGTON 98104 7010
(206) 624 5370

7

1 STATE OF WASHINGTON)
2 COUNTY OF KING) ss.

3 DORA FELLHAUER, being first duly sworn, upon oath deposes
4 and states as follows:

5 That she is the grandmother of TARA LYNN BROWN, and has
6 agreed to act as guardian ad litem herein; that she has read the
7 foregoing CONSENT TO ACT AS GUARDIAN AD LITEM; that she knows the
8 contents thereof and believes the same to be true.

9
10 Dora Fellhauer
DORA FELLHAUER

11 SUBSCRIBED AND SWORN to before me this 31st day of July,
12 1986.

13
14 Linda L. Suggen
NOTARY PUBLIC in and for the
15 State of Washington residing
at Bethell.

16 My commission expires: 3-8-88.

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26 CONSENT TO ACT AS GUARDIAN
AD LITEM /2

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SUPERIOR COURT OF WASHINGTON FOR KING COUNTY

KATHY LEE BUTLER and STEVEN L. BUTLER, wife and husband, and the marital community composed thereof; and KATHY BUTLER as guardian ad litem for SCOTT WILLIAM LIEN and RANDY WILLIAM LIEN, minors; and SANDI LEE BROWN and LYLE DAVID BROWN, wife and husband, and the marital community composed thereof; and DORA FELLHAUER as guardian ad litem for TARA LYNN BROWN and TROY STEVEN BROWN, minors; and CHRISTINE KATHY HALL and DONALD T. HALL, wife and husband, and the marital community composed thereof,

Plaintiffs,

v.

DONALD LEE BARNETT and BARBARA BARNETT, husband and wife, and the marital community composed thereof, and the COMMUNITY CHAPEL AND BIBLE TRAINING CENTER, a Washington corporation,

Defendants.

NO. 86-2-18176 8

PETITION FOR APPOINTMENT OF GUARDIAN AD LITEM

COMES NOW, KATHY LEE BUTLER, petitioner herein, and respectfully shows the court as follows:

1. That RANDY WILLIAM LIEN, is a minor child, born in 1974.

PETITION FOR APPOINTMENT OF GUARDIAN AD LITEM

LAW OFFICES
KARGIANIS & AUSTIN
47TH FLOOR COLUMBIA CENTER
701 FIFTH AVENUE
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(206) 624-5370

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SUPERIOR COURT OF WASHINGTON FOR KING COUNTY

KATHY LEE BUTLER and STEVEN L. BUTLER, wife and husband, and the marital community composed thereof; and KATHY BUTLER as guardian ad litem for SCOTT WILLIAM LIEN and RANDY WILLIAM LIEN, minors; and SANDI LEE BROWN and LYLE DAVID BROWN, wife and husband, and the marital community composed thereof; and DORA FELLHAUER as guardian ad litem for TARA LYNN BROWN and TROY STEVEN BROWN, minors; and CHRISTINE KATHY HALL and DONALD T. HALL, wife and husband, and the marital community composed thereof,

Plaintiffs,

v.

DONALD LEE BARNETT and BARBARA BARNETT, husband and wife, and the marital community composed thereof, and the COMMUNITY CHAPEL AND BIBLE TRAINING CENTER, a Washington corporation,

Defendants.

NO. 86-2-18176 8

ORDER APPOINTING
GUARDIAN AD LITEM

THIS MATTER having come on regularly before the above-entitled court on the petition of KATHY LEE BUTLER for the appointment of a guardian ad litem for RANDY WILLIAM LIEN, a minor 12 years of

ORDER APPOINTING
GUARDIAN AD LITEM

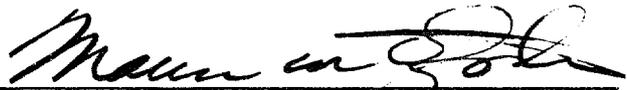
LAW OFFICES
KARGIANIS & AUSTIN
47TH FLOOR COLUMBIA CENTER
701 FIFTH AVENUE
SEATTLE, WASHINGTON 98104 7010
(206) 624-5370

9

1 age; and it appearing to the court that RANDY WILLIAM LIEN, is a
2 minor and without a guardian ad litem; that said minor has a good
3 cause of action against the defendants above-named, and it further
4 appearing that KATHY LEE BUTLER is a fit and proper person to be
5 appointed guardian ad litem for said minor for the purpose of
6 bringing said cause of action on his behalf; NOW, THEREFORE, it
7 is hereby,

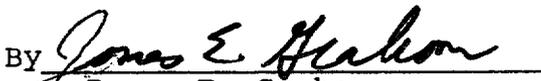
8 ORDERED that KATHY LEE BUTLER, and she hereby is, appointed
9 guardian ad litem for RANDY WILLIAM LIEN, a minor, to bring said
10 action against defendants above-named on his behalf.

11 DONE IN OPEN COURT this 31 day of July, 1986.

12
13 
14 JUDGE/COURT COMMISSIONER

15 Presented by:

16 KARGIANIS & AUSTIN

17
18 BY 
19 James E. Graham,
20 Of Attorneys for
21 Defendants

22
23
24
25
26 ORDER APPOINTING
GUARDIAN AD LITEM /2

LAW OFFICES
KARGIANIS & AUSTIN
47TH FLOOR COLUMBIA CENTER
701 FIFTH AVENUE
SEATTLE, WASHINGTON 98104-7010
(206) 624-5370

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SEATTLE, WASH.

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Superior Court Clerk

SUPERIOR COURT OF WASHINGTON FOR KING COUNTY

KATHY LEE BUTLER and STEVEN L. BUTLER, wife and husband, and the marital community composed thereof; and KATHY BUTLER as guardian ad litem for SCOTT WILLIAM LIEN and RANDY WILLIAM LIEN, minors; and SANDI LEE BROWN and LYLE DAVID BROWN, wife and husband, and the marital community composed thereof; and DORA FELLHAUER as guardian ad litem for TARA LYNN BROWN and TROY STEVEN BROWN, minors; and CHRISTINE KATHY HALL and DONALD T. HALL, wife and husband, and the marital community composed thereof,

Plaintiffs,

v.

DONALD LEE BARNETT and BARBARA BARNETT, husband and wife, and the marital community composed thereof, and the COMMUNITY CHAPEL AND BIBLE TRAINING CENTER, a Washington corporation,

Defendants.

NO. 86-2-18176 8

CONSENT TO ACT AS
GUARDIAN AD LITEM

I, KATHY LEE BUTLER, hereby consent to act as guardian ad litem for RANDY WILLIAM LIEN, a minor, in the above-entitled action.

DATED this 30 day of July, 1986.

Kathy Lee Butler
KATHY LEE BUTLER

CONSENT TO ACT AS
GUARDIAN AD LITEM

LAW OFFICES
KARGIANIS & AUSTIN
47TH FLOOR COLUMBIA CENTER
701 FIFTH AVENUE
SEATTLE WASHINGTON 98104 7010
(206) 624 5370

10

1 STATE OF WASHINGTON)
2 COUNTY OF KING) ss.

3 KATHY LEE BUTLER, being first duly sworn, upon oath deposes
4 and states as follows:

5 That she is the natural mother of RANDY WILLIAM LIEN, and has
6 agreed to act as guardian ad litem herein; that she has read the
7 foregoing CONSENT TO ACT AS GUARDIAN AD LITEM; that she knows the
8 contents thereof and believes the same to be true.

9
10 Kathy Lee Butler
11 KATHY LEE BUTLER

12 SUBSCRIBED AND SWORN to before me this 30th day of July,
13 1986.

14 Linda L. Suggen's
15 NOTARY PUBLIC in and for the
16 State of Washington residing
at Burkell.

17 My commission expires: 3-8-88.

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26 CONSENT TO ACT AS
GUARDIAN AD LITEM /2

LAW OFFICES
KARGIANIS & AUSTIN
47TH FLOOR COLUMBIA CENTER
701 FIFTH AVENUE
SEATTLE, WASHINGTON 98104-7010
(206) 624-5370

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SEATTLE, WA

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Clerks Section
Superior Court Clerk

SUPERIOR COURT OF WASHINGTON FOR KING COUNTY

KATHY LEE BUTLER and STEVEN L.)
BUTLER, wife and husband, and)
the marital community composed)
thereof; and KATHY BUTLER as)
guardian ad litem for SCOTT)
WILLIAM LIEN and RANDY WILLIAM)
LIEN, minors; and SANDI LEE)
BROWN and LYLE DAVID BROWN,)
wife and husband, and the)
marital community composed)
thereof; and DORA FELLHAUER)
as guardian ad litem for TARA)
LYNN BROWN and TROY STEVEN)
BROWN, minors; and CHRISTINE)
KATHY HALL and DONALD T. HALL,)
wife and husband, and the)
marital community composed)
thereof,)

Plaintiffs,)

v.)

DONALD LEE BARNETT and BARBARA)
BARNETT, husband and wife, and)
the marital community composed)
thereof, and the COMMUNITY)
CHAPEL AND BIBLE TRAINING CENTER,)
a Washington corporation,)

Defendants.)

86-2-18176 8
NO.

PETITION FOR APPOINTMENT
AS GUARDIAN AD LITEM

COMES NOW DORA FELLHAUER, petitioner herein, and respectfully
shows the court as follows:

1. That TROY STEVEN BROWN, is a minor child, born in 1968.

PETITION FOR APPOINTMENT
AS GUARDIAN AD LITEM

LAW OFFICES
KARGIANIS & AUSTIN
47TH FLOOR COLUMBIA CENTER
701 FIFTH AVENUE
SEATTLE, WASHINGTON 98104-7010
(206) 624-5370

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2. That TROY STEVEN BROWN has a cause of action against the above-named defendants for injuries caused by their negligence which occurred on or about 1984-1985.

3. That TROY STEVEN BROWN may appear in court only by and through his guardian ad litem.

4. That DORA FELLHAUER is the grandmother of TROY STEVEN BROWN and is a proper and responsible person to be appointed guardian ad litem for the minor plaintiff for the purpose of instituting and prosecuting an action on behalf of said minor.

WHEREFORE, petitioner requests that an order be entered appointing DORA FELLHAUER as guardian ad litem for the purpose of instituting and prosecuting an action on behalf of the plaintiff TROY STEVEN BROWN.

DATED this 30 of July, 1986.

Dora Fellhauer
DORA FELLHAUER

SUBSCRIBED AND SWORN to before me this 30th day of July, 1986.

Linda L. Suggen
NOTARY PUBLIC in and for the State of Washington residing at *Bethell*.

My commission expires: *3-8-88*.

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Superior Court Clerk

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SEATTLE, WA

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SUPERIOR COURT OF WASHINGTON FOR KING COUNTY

KATHY LEE BUTLER and STEVEN L. BUTLER, wife and husband, and the marital community composed thereof; and KATHY BUTLER as guardian ad litem for SCOTT WILLIAM LIEN and RANDY WILLIAM LIEN, minors; and SANDI LEE BROWN and LYLE DAVID BROWN, wife and husband, and the marital community composed thereof; and DORA FELLHAUER as guardian ad litem for TARA LYNN BROWN and TROY STEVEN BROWN, minors; and CHRISTINE KATHY HALL and DONALD T. HALL, wife and husband, and the marital community composed thereof,

Plaintiffs,

v.

DONALD LEE BARNETT and BARBARA BARNETT, husband and wife, and the marital community composed thereof, and the COMMUNITY CHAPEL AND BIBLE TRAINING CENTER, a Washington corporation,

Defendants.

86-2-18176 8
NO.

ORDER APPOINTING
GUARDIAN AD LITEM

THIS MATTER having come on regularly before the above-entitled court on the petition of DORA FELLHAUER for the appointment of

ORDER APPOINTING
GUARDIAN AD LITEM

LAW OFFICES
KARGIANIS & AUSTIN
47TH FLOOR COLUMBIA CENTER
701 FIFTH AVENUE
SEATTLE, WASHINGTON 98104-7010
(206) 624-5370

12

1 a guardian ad litem for TROY STEVEN BROWN, a minor 17 years of
2 age; and it appearing to the court that TROY STEVEN BROWN, is a
3 minor and without a guardian ad litem; that said minor has a good
4 cause of action against the defendants above-named, and it further
5 appearing that DORA FELLHAUER is a fit and proper person to be
6 appointed guardian ad litem for said minor for the purpose of
7 bringing said cause of action on his behalf; NOW, THEREFORE, it
8 is hereby,

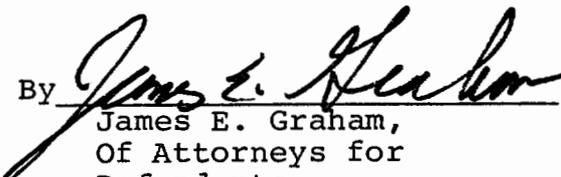
9 ORDERED that DORA FELLHAUER, and she hereby is, appointed
10 guardian ad litem for TROY STEVEN BROWN, a minor, to bring said
11 action against defendants above-named on his behalf.

12 DONE IN OPEN COURT this 31 day of July, 1986.

13
14 
15 JUDGE/COURT COMMISSIONER

16 Presented by:

17 KARGIANIS & AUSTIN

18
19 By 
20

James E. Graham,
Of Attorneys for
Defendants

21
22
23
24
25
26 ORDER APPOINTING
GUARDIAN AD LITEM /2

LAW OFFICES
KARGIANIS & AUSTIN
47TH FLOOR COLUMBIA CENTER
701 FIFTH AVENUE
SEATTLE WASHINGTON 98104 7010
(206) 624 5370

JEG/ljs
7/30/86

RECEIVED
In King County Superior Court Clerk's Office

JUL 31 1986

Cashier Section
Superior Court Clerk

FILED

1986 JUL 31 PM 2:58

KING COUNTY
SUPERIOR COURT CLERK
SEATTLE, WA

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SUPERIOR COURT OF WASHINGTON FOR KING COUNTY

KATHY LEE BUTLER and STEVEN L. BUTLER, wife and husband, and the marital community composed thereof; and KATHY BUTLER as guardian ad litem for SCOTT WILLIAM LIEN and RANDY WILLIAM LIEN, minors; and SANDI LEE BROWN and LYLE DAVID BROWN, wife and husband, and the marital community composed thereof; and DORA FELLHAUER as guardian ad litem for TARA LYNN BROWN and TROY STEVEN BROWN, minors; and CHRISTINE KATHY HALL and DONALD T. HALL, wife and husband, and the marital community composed thereof,

Plaintiffs,

v.

DONALD LEE BARNETT and BARBARA BARNETT, husband and wife, and the marital community composed thereof, and the COMMUNITY CHAPEL AND BIBLE TRAINING CENTER, a Washington corporation,

Defendants.

86-2-18176 8
NO.

CONSENT TO ACT AS
GUARDIAN AD LITEM

I, DORA FELLHAUER, hereby consent to act as guardian ad litem for TROY STEVEN BROWN, a minor, in the above-entitled action.

DATED this 30 day of July, 1986.

Dora Fellhauer
DORA FELLHAUER

13

CONSENT TO ACT AS
GUARDIAN AD LITEM

LAW OFFICES
KARGIANIS & AUSTIN
47TH FLOOR COLUMBIA CENTER
701 FIFTH AVENUE
SEATTLE, WASHINGTON 98104-7010
(206) 624-5370

In the SUPERIOR Court, for KING County, state of Wash. No. 86-2-18176-8

AFFIDAVIT OF SERVICE OF

KATHY LEE BUTLER, ET-UX., ET-AL.,

vs.

DONALD LEE BARNETT ET-UX, ET-AL.,

FILED
AUG -5 AM 9:03
KING COUNTY
SUPERIOR COURT CLERK
SEATTLE
Defendant
Garnishee Defendant

SUMMONS & COMPLAINT FOR MINISTERIAL MALPRACTICE, OUTRAGE, SEXUAL BATTER, NEGLIGENCE, COUNSELING, WRONGFUL DISCONSORTIUM, DEFACTION, AND LOSS OF PARENTAL CONSORTIUM

State of Washington

County of King

} SS.

The writ served was accompanied by four answer forms and three postage prepaid envelopes which were pre-addressed to the Clerk of the Court, to the Plaintiff or his attorney, and to the Defendant, and cash or check payable to the garnishee, to the amount of Ten Dollars.

A copy of the summons served is attached hereto

The undersigned, being first duly sworn, on oath deposes and says: That he is now and at all times herein mentioned was a citizen of the United States and resident of the State of Washington, over the age of eighteen years, not a party to or interested in the above entitled action and competent to be a witness therein.

That on 8/4/86 at 6:50 a M., at 416 S.W. 192nd, Seattle,

King County, Washington, affiant duly served the above-described documents in the above-entitled matter upon

DONALD LEE BARNETT

by then and there personally delivering a true and correct copy thereof to and leaving same with _____

DONALD LEE BARNETT

RESIDENCE SERVICE

That at the time and place set forth above affiant duly served the above described documents in the above-entitled matter upon _____

BARBARA BARNETT

by then and there, at the residence and usual place of abode of said person(s), personally delivering A true and correct copy(ies) thereof to and leaving the same with _____

DONALD LEE BARNETT, HUSBAND

being a person of suitable age and discretion then resident therein.

Affiant further states that he is informed and believes, and therefore alleges, that neither of said defendants is in the military service of the United States.

_____ TRIPS @ _____ MILES

Subscribed and Sworn to before me 8/4/86

R. DAVIS sk

SERVICE ATTEMPTED AT:

Jan
NOTARY PUBLIC in and for the State of Washington, residing at _____ SEATTLE

Service Fees 12.00 Travel 43.00 Return Fee 5.00 Cert. Mail _____ Total \$ 60.00

148

RECEIVED
In King County Superior Court Clerk's Office
JUL 31 1986
Cashier Section
Superior Court Clerk
(Copy Receipt)

(Clerk's Date Stamp)

**SUPERIOR COURT OF WASHINGTON FOR
KING COUNTY**

KATHY LEE BUTLER, et ux, et al.,
Plaintiffs,

v.

DONALD LEE BARNETT, et ux, et al.,
Defendants.

86-2-18176 8

**SUMMONS
(20 days)**

TO: Defendants above-named:

A lawsuit has been started against you in the above entitled court by Kathy Lee Butler, et ux, et al., plaintiff. Plaintiff's claim is stated in the written complaint, a copy of which is served upon you with this summons.

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

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

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

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

KARGIANIS & AUSTIN

By *George Kargianis*
Attorneys for plaintiff.
George Kargianis
47th Floor Columbia Center
701 Fifth Avenue
Seattle, Washington 98104-7010
624-5370

Dated: July 31, 1986

ADMITTED
KARGIANIS & ...

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IN THE _____ SUPERIOR _____ COURT OF THE STATE OF WASHINGTON FOR
_____ KING _____ COUNTY

KATHY LEE BUTLER and STEPHEN LYNN BUTLER, wife and husband and the marital community composed thereof; KATHY LEE BUTLER as guardian ad litem for SCOTT WILLIAM LIEN and RANDY WILLIAM LIEN, minors and SANDI LEE BROWN and LYLE DAVID BROWN, wife and husband and the marital community composed thereof; and DORA FELLHAUER as guardian ad litem for TARA LYNN BROWN and TROY STEVEN BROWN, minors; and CHRISTINE HALL, and DONALD T. HALL, wife and husband and the marital community composed thereof,)
-vs- Plaintiffs,)
DONALD LEE BARNETT and BARBARA BARNETT, husband and wife, and the marital community composed thereof; COMMUNITY CHAPEL AND BIBLE TRAINING CENTER, a Washington corporation; and JANE AND JOHN DOES 1-5,)
Defendants.)

AUG 18 PM 4 29
NO. 86-2-18176-8

NOTICE OF APPEARANCE ON BEHALF OF DEFENDANTS BARNETT AND COMMUNITY CHAPEL AND BIBLE TRAINING CENTER

TO: PLAINTIFFS, and
TO: GEORGE KARGIANIS, Attorney for Plaintiffs:

PLEASE TAKE NOTICE that DONALD LEE BARNETT and BARBARA BARNETT; COMMUNITY CHAPEL AND BIBLE TRAINING CENTER, defendants, without waiving objection as to improper service or jurisdiction, enter their appearance by their undersigned attorneys, and service of all pleadings, notices, documents or other papers, exclusive of process, may be had upon said defendants by serving the undersigned attorneys at their address below stated.

DATED this 15th day of August, 1986.

LEE, SMART, COOK, MARTIN & PATTERSON, P.S., INC.

By David L. Martin
David L. Martin
Of Attorneys for Defendants Barnett and Community Chapel and Bible Training Center

Notice of Appearance
(Barnett; Comm. Chapel)

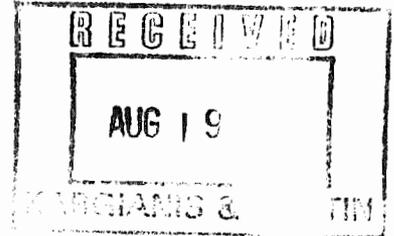
LEE, SMART, COOK, MARTIN & PATTERSON, P.S., INC.
ATTORNEYS AT LAW
800 WASHINGTON BUILDING
1325 FOURTH AVENUE
SEATTLE, WASHINGTON 98101
(206) 624-7890

154

FILED

1986 AUG 19 PM 2:56

KING COUNTY
SUPERIOR COURT CLERK
SEATTLE, WA



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IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON
IN AND FOR KING COUNTY

KATHY LEE BUTLER and STEPHEN)
LYNN BUTLER, wife and husband,)
and the marital community)
composed thereof; KATHY LEE)
BUTLER as guardian ad litem)
for SCOTT WILLIAM LIEN and)
RANDY WILLIAM LIEN, minors;)
SANDI LEE BROWN and LYLE)
DAVID BROWN, wife and husband,)
and the marital community)
composed thereof; DORA)
FELLHAUER as guardian ad litem)
for TARA LYNN BROWN and TROY)
STEVEN BROWN, minors; and)
CHRISTINE HALL and DONALD T.)
HALL, wife and husband, and)
the marital community composed)
thereof,)

NO. 86-2-18176-8

NOTICE OF APPEARANCE

Plaintiffs,

vs.

DONALD LEE BARNETT and BARBARA)
BARNETT, husband and wife, and)
the marital community composed)
thereof; COMMUNITY CHAPEL AND)
BIBLE TRAINING CENTER, a)
Washington corporation; and)
JANE and JOHN DOES 1-5,)

Defendants.

TO THE Plaintiffs above named, and
TO Kargianis & Austin and George Kargianis, Attorneys of Record:

NOTICE OF APPEARANCE - 1

ORIGINAL

MOREN, LAGESCHULTZ & CORNELL P.S.
ATTORNEYS AT LAW
ROOSEVELT PINEHURST BUILDING
11320 ROOSEVELT WAY N.E.
SEATTLE WASHINGTON 98125
(206) 365 5500

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YOU AND EACH OF YOU WILL PLEASE TAKE NOTICE that DONALD LEE BARNETT and BARBARA BARNETT, COMMUNITY CHAPEL AND BIBLE TRAINING CENTER and JANE and JOHN DOES 1-5 hereby appear in the above entitled cause by the undersigned associated Attorneys and request that all further papers and pleadings herein, except original process, be served upon the undersigned associated Attorneys at their addresses below stated.

LEE, SMART, COOK, MARTIN & PATTERSON, P.S.

By: Michael J. Bond
MICHAEL J. BOND
Attorney for Defendants
800 Washington Bldg.
Seattle, WA 98101
Phone: (206) 624-7990

MOREN, LAGESCHULTE & CORNELL, P.S.

By: Michael W. Bugni
MICHAEL W. BUGNI, Attorneys
Attorney for Defendants
11320 Roosevelt Way N.E.
Seattle, Washington 98133
Phone: (206) 365-5500



SUPERIOR COURT OF WASHINGTON
COUNTY OF KING

Comm. Chapel

vs.

Plaintiff(s)

Defendant(s)

FILED

NOV 18

KING COUNTY
SUPERIOR COURT

86-2-58176-8

ORDER AUTHORIZING REMOVAL OF COURT FILE

IT IS ORDERED that:

Name: PAT CRAFT

Address: 13707 NE 11th St. Apt. 4-3
Bellevue WA. 98005

Telephone No.: (206) 644-9771

is authorized to remove from the Clerk's Office the file in the above entitled matter for a period of 2 days.

Dated: 11/17/86

Judge/Court Commissioner/
Approving Authority
COURT COMMISSIONER PRO TEM

Presented by:

PAGER # 994 2560

- DIAL 994 2560
- When it answers type in the # you want me to call
- PUSH the # sign
- HANG UP

I'll call within 10 minutes

Rec'd
11/17/86

EXPOI

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JAN 06 1987

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LEE, SMART, COOK,
MARTIN AND PATTERSON
1987 JAN -7 AM 9:55

MOREN,
FLAGESCHULTE & CORNELL, P.S.

1987 JAN -7 PM 1:12

(Copy Receipt)

MINOR (Clerk's Date Stamp)

SUPERIOR COURT OF WASHINGTON FOR KING COUNTY

KATHY LEE BUTLER, ET UX, ET AL.,
Plaintiff
vs.
DONALD LEE BARNETT, ET UX, ET AL.,
Defendant

No. 86-2-18176-8

**MOTION AND AFFIDAVIT FOR
ORDER OF DEFAULT**
(Civil Rules 55(a) and 82(c))

I. MOTION

1.1 Plaintiff moves for an order of default against
DONALD LEE BARNETT and BARBARA BARNETT,
Defendant, S. and COMMUNITY CHAPEL AND BIBLE
TRAINING CENTER, and JANE AND JOHN DOES 1-5.

1.2 Proof of service was filed on ... 8/4/86

1.3 Nature of action is: ministerial malpractice
.....

2.3 Non-Military Service. Defendant is not now on
active duty in any of the armed forces of the United
States.

2.4 Default. Defendant has failed to appear
and/or file a responsive pleading.

2.5 Venue. The basis for venue is
RCW 4.12.020 - Actions tried where
cause arose

II. AFFIDAVIT

State of Washington—ss, County of ... King

Undersigned on oath states:

2.1 Affiant. Affiant is

Attorney for plaintiffs

2.2 Service. Summons was served on defendant on
on August 1, 1986 and August 4, 1986

- (a) by accepting service;
- (b) by personal service: within State of
Washington; or outside of State of
Washington; and/or
- (c) by publication of summons commencing
on

[Name and Address for Window Envelope]

Type Name: JEFF CAMPICHE, affiant

Sworn and Subscribed on JANUARY 5, 1987.

Notary Public for the State of Washington, resid-
ing at Redmond, WA

[Name, address and telephone of Lawyer(s)]

JEFF CAMPICHE
KARGIANIS & AUSTIN
47th Floor Columbia Center
701 - 5th Avenue
Seattle, WA 98104 7010
624-5370

RECEIVED
LEE, SMART, COOK,
MARTIN AND PATTERSON

1987 JAN 07 AM 9:55

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JAN 06 1987

MOREN,

LAGESCHULTE & CORNELL P.S. (Stamp)
1987 JAN -7 AM 1:12

SUPERIOR COURT OF WASHINGTON FOR KING COUNTY

KATHY LEE BUTLER, et al., et ux.,
Plaintiff,

No. 86 2 18176 8

DONALD LEE BARNETT, et al., et ux.,
Defendant,

NOTE FOR MOTION DOCKET
(KC Local CR 40(a) (2a))

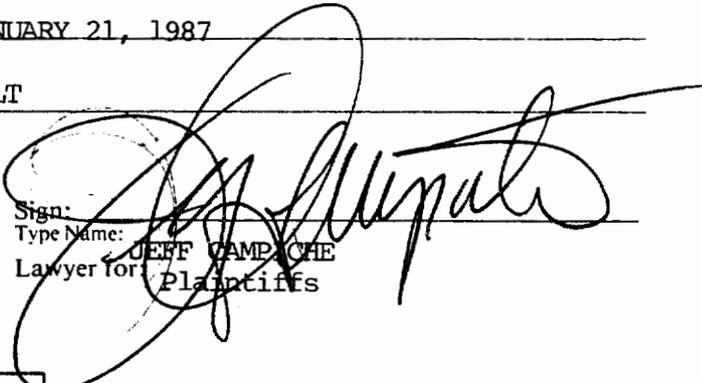
TO THE CLERK AND TO: DEFENDANTS AND THEIR RESPECTIVE COUNSEL,
LEE, SMART, COOK, MARTIN & PATTERSON and
MOREN, LAGESCHULTE & CORNELL

Please notice that an issue of law in this case will be heard on the date below and the clerk is requested to note this issue on the motion docket for that day.

Hearing Date for Motion: WEDNESDAY, JANUARY 21, 1987

Nature of Motion: MOTION FOR DEFAULT

Dated: JANUARY 5, 1987

Sign: 
Type Name: JEFF CAMPICHE
Lawyer for: Plaintiffs

INSTRUCTIONS:

1. List Names and Addresses of other Lawyers on reverse side.
2. Serve other Parties and file with the Clerk of the Superior Court, E609, King County Courthouse.

[Name and Address for Window Envelope]

[Name, address and telephone of Lawyer(s)]

Kargianis & Austin
Jeff Campiche
47th Floor Columbia
701 - 5th Avenue
Seattle, WA 98104
624-5370

20

LIST OF NAMES AND ADDRESSES OF ALL LAWYERS IN THIS CASE:

NAME: LEE, SMART, COOK, MARTIN & PATTERSON

Lawyer(s) for: Defendants Barnett / Bible Training Center
Address: 800 Washington Building
Seattle, WA 98104

NAME: MOREN, LAGESCHULTE & CORNELL
Lawyer(s) for: Barnett / Bible Training Center
Address: 11320 Roosevelt N.E.
Seattle, WA 98125

NAME:

Lawyer(s) for:
Address:

NAME:

Lawyer(s) for:
Address:

JAN 8
KARGIANIS & AUGER

IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON
IN AND FOR KING COUNTY

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KATHY LEE BUTLER and STEPHEN)
LYNN BUTLER, wife and husband,)
and the marital community)
composed thereof; KATHY LEE)
BUTLER as guardian ad litem)
for SCOTT WILLIAM LIEN and)
RANDY WILLIAM LIEN, minors;)
SANDI LEE BROWN and LYLE)
DAVID BROWN, wife and husband,)
and the marital community)
composed thereof; DORA)
FELLHAUER as guardian ad litem)
for TARA LYNN BROWN and TROY)
STEVEN BROWN, minors; and)
CHRISTINE HALL and DONALD T.)
HALL, wife and husband, and)
the marital community composed)
thereof,)

Plaintiffs,

vs.

DONALD LEE BARNETT and BARBARA)
BARNETT, husband and wife, and)
the marital community composed)
thereof; COMMUNITY CHAPEL AND)
BIBLE TRAINING CENTER, a)
Washington corporation; and)
JANE and JOHN DOES 1-5,)

Defendants.

NO. 86-2-18176-8

ANSWER AND COUNTERCLAIM

15

COME NOW the defendants by and through their attorneys of
record, Michael J. Bond of Lee, Smart, Cook, Martin & Patterson,
P.S., and Michael W. Bugni of Moren, Lageschulte & Cornell, P.S.,
and for answer to plaintiffs' Complaint for Personal Injuries and
Damages in the above-captioned matter, admit, deny and allege as
follows:

ANSWER - 1

ORIGINAL

MOREN, LAGESCHULTE & CORNELL, P.S.
ATTORNEYS AT LAW
ROOSEVELT PINEHURST BUILDING
11320 ROOSEVELT WAY N.E.
SEATTLE WASHINGTON 98125
(206) 365 9900

21

1 1. Jurisdiction and Venue. Defendants deny the allegations
2 contained in paragraph 1 of plaintiffs' Complaint.

3 2. Plaintiffs. Defendants admit the allegations contained
4 in paragraph 2 of plaintiffs' Complaint, although defendants lack
5 any evidence that Kathy Lee Butler has been appointed guardian ad
6 litem for Scott and Randy Lien, or that Dora Fellhauer has been
7 appointed guardian ad litem for Tara and Troy Brown, and
8 therefore deny this allegation.

9 3. Defendants.

10 A. Defendants admit the allegations contained in the
11 first two sentences of paragraph 3.A of plaintiffs' Complaint.
12 Defendants deny that the alleged actions of defendants, as
13 described in plaintiffs' Complaint, took place, and defendants
14 further deny the allegations contained in the remainder of
15 paragraph 3.A of plaintiffs' Complaint.

16 B. Defendants admit the allegations contained in the
17 first sentence of paragraph 3.B of plaintiffs' Complaint.
18 Defendants deny that the alleged actions of defendants, as
19 described in plaintiffs' Complaint, took place, and defendants
20 further deny the allegations contained in the remainder of
21 paragraph 3.B of plaintiffs' Complaint.

22 C. Defendants admit the allegations contained in
23 paragraph 3.C of plaintiffs' Complaint.

24 D. Defendants deny the allegations contained in
25 paragraph 3.D of plaintiffs' Complaint.

1 E. Defendants admit the allegations contained in the
2 first sentence contained in paragraph 3.E of plaintiffs'
3 Complaint. Defendants deny the remaining allegations contained
4 in paragraph 3.E of plaintiffs' Complaint because they are an
5 inaccurate, incorrect and/or misleading characterization of
6 defendants' teachings.

7 F. Defendants deny the allegations contained in
8 paragraph 3.F of plaintiffs' Complaint. The defendant
9 corporation is a non-member corporation.

10 G. Defendants admit the allegations contained in
11 paragraph 3.G of plaintiffs' Complaint.

12 H. Defendants deny the allegations contained in
13 paragraph 3.H of plaintiffs' Complaint.

14 I. Defendants deny the allegations contained in
15 paragraph 3.I of plaintiffs' Complaint.

16 J. Defendants deny the allegations contained in
17 paragraph 3.J of plaintiffs' Complaint.

18 K. Defendants admit that Sandi Lee and Lyle David
19 Brown are the parents of Tara Lynn and Troy Steven Brown.
20 Defendants deny the remaining allegations contained in paragraph
21 3.K of plaintiffs' Complaint.

22 L. Defendants admit that Kathy Lee Butler is the
23 mother of Scott William and Randy William Lien. Defendants deny
24 the remaining allegations contained in paragraph 3.L of
25 plaintiffs' Complaint.

1 M. Defendants deny the allegations contained in
2 paragraph 3.M of plaintiffs' Complaint.

3 N. Defendants deny the allegations contained in
4 paragraph 3.N of plaintiffs' Complaint.

5 O. Defendants deny the allegations contained in
6 paragraph 3.O of plaintiffs' Complaint.

7 P. Defendants deny the allegations contained in
8 paragraph 3.P of plaintiffs' Complaint.

9 Q. Defendants deny the allegations contained in
10 paragraph 3.Q of plaintiffs' Complaint because they are an
11 inaccurate, incorrect and/or misleading characterization of
12 defendants' teachings.

13 R. Defendants deny the allegations contained in
14 paragraph 3.R of plaintiffs' Complaint.

15 S. Defendants deny the allegations contained in
16 paragraph 3.S of plaintiffs' Complaint.

17 T. Defendants deny the allegations contained in
18 paragraph 3.T of plaintiffs' Complaint.

19 U. Defendants deny the allegations contained in
20 paragraph 3.U of plaintiffs' Complaint.

21 V. Defendants deny the allegations contained in
22 paragraph 3.V of plaintiffs' Complaint.

23 W. Defendants admit that plaintiff Brown was
24 disfellowshipped from the defendant Community Chapel and Bible
25

1 Training Center, however, defendants deny each and every other
2 allegation contained in paragraph 3.W of plaintiffs' Complaint.

3 X. Defendants deny the allegations contained in
4 paragraph 3.X of plaintiffs' Complaint.

5 Y. Defendants deny the allegations contained in
6 paragraph 3.Y of plaintiffs' Complaint.

7 Z. Defendants deny the allegations contained in
8 paragraph 3.Z of plaintiffs' Complaint.

9 AA. Defendants deny the allegations contained in
10 paragraph 3.AA of plaintiffs' Complaint.

11 BB. Defendants deny the allegations contained in
12 paragraph 3.BB of plaintiffs' Complaint.

13 CC. Defendants deny the allegations contained in
14 paragraph 3.CC of plaintiffs' Complaint.

15 FIRST CAUSE OF ACTION: ASSAULT AND BATTERY

16 A. Defendants repeat and reallege each and every answer as
17 previously set forth above, as if fully set forth herein.

18 B. Defendants deny the allegations contained in this
19 paragraph of plaintiffs' Complaint.

20 SECOND CAUSE OF ACTION: OUTRAGE

21 A. Defendants repeat and reallege each and every answer as
22 previously set forth above, as if fully set forth herein.

23 B. Defendants deny the allegations contained in this
24 paragraph of plaintiffs' Complaint.

25

1 C. Defendants deny the allegations contained in this
2 paragraph of plaintiffs' Complaint.

3 D. Defendants deny the allegations contained in this
4 paragraph of plaintiffs' Complaint.

5 E. Defendants deny the allegations contained in this
6 paragraph of plaintiffs' Complaint.

7 F. Defendants deny the allegations contained in this
8 paragraph of plaintiffs' Complaint.

9 THIRD CAUSE OF ACTION: MINISTERIAL MALPRACTICE

10 A. Defendants repeat and reallege each and every answer as
11 previously set forth above, as if fully set forth herein.

12 B. Defendants deny the allegations contained in this
13 paragraph of plaintiffs' Complaint.

14 C. Defendants deny the allegations contained in this
15 paragraph of plaintiffs' Complaint.

16 FOURTH CAUSE OF ACTION: COUNSELING MALPRACTICE

17 A. Defendants repeat and reallege each and every answer as
18 previously set forth above, as if fully set forth herein.

19 B. Defendants deny the allegations contained in this
20 paragraph of plaintiffs' Complaint.

21 FIFTH CAUSE OF ACTION: NEGLIGENT COUNSELING

22 A. Defendants repeat and reallege each and every answer as
23 previously set forth above, as if fully set forth herein.

24 B. Defendants lack sufficient information upon which to
25 form a belief as to the truth or falsity of the allegations

1 contained in this paragraph of plaintiffs' Complaint and
2 therefore deny the same.

3 C. Defendants deny the allegations contained in this
4 paragraph of plaintiffs' Complaint.

5 D. Defendants deny the allegations contained in this
6 paragraph of plaintiffs' Complaint.

7 E. Defendants deny the allegations contained in this
8 paragraph of plaintiffs' Complaint.

9 F. Defendants deny the allegations contained in this
10 paragraph of plaintiffs' Complaint.

11 SIXTH CAUSE OF ACTION: WRONGFUL DISFELLOWSHIP

12 A. Defendants repeat and reallege each and every answer as
13 previously set forth above, as if fully set forth herein.

14 B. Defendants deny the allegations contained in this
15 paragraph of plaintiffs' Complaint.

16 C. Defendants deny the allegations contained in this
17 paragraph of plaintiffs' Complaint.

18 D. Defendants deny the allegations contained in this
19 paragraph of plaintiffs' Complaint.

20 SEVENTH CAUSE OF ACTION: RESPONDEAT SUPERIOR

21 A. Defendants repeat and reallege each and every answer as
22 previously set forth above, as if fully set forth herein.

23 B. Defendants admit that defendants Donald Lee Barnett and
24 Barbara Barnett are agents, employees or servants of defendant
25 Community Chapel and Bible Training Center. Defendants deny the

1 remaining allegations contained in this paragraph of plaintiffs'
2 Complaint.

3 C. Defendants deny the allegations contained in this
4 paragraph of plaintiffs' Complaint.

5 D. Defendants deny the allegations contained in this
6 paragraph of plaintiffs' Complaint.

7 E. Defendants deny the allegations contained in this
8 paragraph of plaintiffs' Complaint.

9 EIGHTH CAUSE OF ACTION: INFLICTION OF EMOTIONAL DISTRESS

10 A. Defendants repeat and reallege each and every answer as
11 previously set forth above, as if fully set forth herein.

12 B. Defendants admit that plaintiffs attended services,
13 classes and other functions of the Community Chapel and Bible
14 Training Center. Defendants deny the remaining allegations
15 contained in this paragraph of plaintiffs' Complaint.

16 C. Defendants deny the allegations contained in this
17 paragraph of plaintiffs' Complaint.

18 D. Defendants deny the allegations contained in this
19 paragraph of plaintiffs' Complaint.

20 E. Defendants deny the allegations contained in this
21 paragraph of plaintiffs' Complaint.

22 NINTH CAUSE OF ACTION: LOSS OF CONSORTIUM

23 A. Defendants repeat and reallege each and every answer as
24 previously set forth above, as if fully set forth herein.
25

1 B. Defendants deny the allegations contained in this
2 paragraph of plaintiffs' Complaint.

3 TENTH CAUSE OF ACTION: LOSS OF PARENTAL CONSORTIUM

4 A. Defendants repeat and reallege each and every answer as
5 previously set forth above, as if fully set forth herein.

6 B. Defendants deny the allegations contained in this
7 paragraph of plaintiffs' Complaint.

8 ELEVENTH CAUSE OF ACTION: DEFAMATION

9 A. Defendants repeat and reallege each and every answer as
10 previously set forth above, as if fully set forth herein.

11 B. Defendants deny the allegations contained in this
12 paragraph of plaintiffs' Complaint.

13 C. Defendants deny the allegations contained in this
14 paragraph of plaintiffs' Complaint.

15 D. Defendants deny the allegations contained in this
16 paragraph of plaintiffs' Complaint.

17 TWELFTH CAUSE OF ACTION: DAMAGES

18 A. Defendants deny the allegations contained in this
19 paragraph of plaintiffs' Complaint.

20 B. Defendants deny the allegations contained in this
21 paragraph of plaintiffs' Complaint.

22 C. Defendants deny the allegations contained in this
23 paragraph of plaintiffs' Complaint.

24 D. Defendants deny the allegations contained in this
25 paragraph of plaintiffs' Complaint.

1 E. Defendants deny the allegations contained in this
2 paragraph of plaintiffs' Complaint.

3
4 AND BY WAY OF AFFIRMATIVE DEFENSE, defendants allege as
5 follows:

6 I.

7 LACK OF SUBJECT MATTER JURISDICTION

8 With respect to plaintiffs' second, third, fourth, fifth,
9 sixth, seventh, eighth, ninth, tenth and twelfth causes of
10 action, the Court lacks jurisdiction over the subject matter
11 inasmuch as the essence of plaintiffs' Complaint pertains to
12 private church matters protected from judicial intervention by
13 the First Amendment to the Constitution of the United States and
14 the Constitution of the State of Washington, Article 1, Section
15 11, Amended 34.

16 II.

17 FAILURE TO STATE A CLAIM

18 With respect to plaintiffs' Third, Fourth, Fifth, Sixth,
19 Seventh, Ninth, Tenth and Twelfth Causes of Action, the
20 plaintiffs' Complaint fails to state a claim upon which relief
21 may be granted.

22 III.

23 STATUTE OF LIMITATIONS

24 The plaintiffs have failed to commence this action within the
25 time required by the applicable Statute of Limitations.

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IV.

COMPARATIVE AND CONTRIBUTORY NEGLIGENCE

Plaintiffs' injuries and damages, if any, were proximately caused by the contributory and/or comparative negligence of the plaintiffs.

V.

CONTRIBUTORY GROSS NEGLIGENCE
AND WANTON AND WILFUL MISCONDUCT

Plaintiffs' injuries and damages, if any, were proximately caused by the gross negligence and/or wanton and wilful misconduct of plaintiffs in acting with gross negligence and intentionally and/or recklessly acting in disregard of the consequences.

VI.

ASSUMPTION OF RISK

Plaintiffs' injuries and damages, if any, are not actionable because plaintiffs assumed the risk of harm by their actions, including but not limited to, voluntary, knowing and express consent to the situation which caused their harm, if any.

VII.

LICENSE

Insofar as plaintiffs have alleged assault and battery in their First Cause of Action, which acts defendants deny, defendants further allege that any and all physical contact forming the basis of plaintiffs' First Cause of Action, if any, was initiated and/or consented to by the relevant plaintiffs.

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VIII.

DEFAMATION DEFENSES

Defendants allege that any public statements regarding any plaintiffs which defendants may have made were legally justified on the basis of truth, fair comment and/or privilege.

IX.

INCONSEQUENTIAL DISFELLOWSHIP

The disfellowship, though not actionable, of plaintiff Sandi Lee Brown, was of no consequence inasmuch as plaintiff Brown had already resigned, quit, and/or discontinued her involvement with Community Chapel and Bible Training Center by the time she was disfellowshipped from the church.

X.

JUSTIFICATION

Regarding plaintiffs' Sixth Cause of Action, defendants had just cause for their actions.

COUNTERCLAIM FOR FRIVOLOUS LAWSUIT

AND BY WAY OF COUNTERCLAIM against plaintiffs and each of them, individually and as designated marital communities, the defendants and each of them allege as follows:

XI.

Plaintiffs' action is frivolous and has been advanced without reasonable cause, requiring the defendants to incur substantial attorney's fees and costs in defending this action. Under RCW

1 4.85.185 and because this action lacks merit and has not been
2 brought in good faith, the defendants and each of them are
3 entitled to judgment for their reasonable expenses, including
4 attorney fees and costs, incurred in defending the present
5 action.

6 XII.

7 Defendants may further be entitled to attorney's fees and
8 costs under RCW 4.84.250 and further plead this statute as an
9 additional theory for recovering their attorneys' fees and costs
10 incurred herein.

11
12 WHEREFORE, having fully answered the plaintiffs' Complaint,
13 having asserted various affirmative defenses, and having
14 asserted a counterclaim for frivolous action, the defendants pray
15 for the following relief.

16 1. That plaintiffs' Complaint be dismissed with prejudice
17 and without costs, disbursements or attorney's fees;

18 2. That defendants and each of them be awarded judgment in
19 their favor as against each and every plaintiff, individually,
20 and the marital communities of Kathy Lee Butler and Stephen
21 Butler, wife and husband, Sandi Lee Brown and Lyle David Brown,
22 wife and husband, and Christine Hall and Donald T. Hall, wife and
23 husband, for their reasonable expenses, including attorney's
24 fees, costs and disbursements included herein, to be established
25 upon post-trial motion, under RCW 4.84.185 and/or RCW 4.84.250;

1 3. That the Court grant such other and further relief as
2 the Court may deem to be just and equitable in the premises.

3 DATED this _____ day of _____, 1986.

4 LEE, SMART, COOK, MARTIN &
5 PATTERSON, P.S.

6 BY Michael J. Bond
7 MICHAEL J. BOND
8 Attorney for Defendants

9 MOREN, LAGESCHULTE & CORNELL, P.S.

10 BY Michael W. Bugni
11 MICHAEL W. BUGNI
12 Attorney for Defendants

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IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON FOR KING COUNTY

KATHY LEE BUTLER and STEPHEN LYNN BUTLER, wife and husband; et al.,
Plaintiffs,
v.
DONALD LEE BARNETT and BARBARA BARNETT, husband and wife; et al.,
Defendants.

NO. 86-2-18176-8

MOTION TO COMPEL DISCOVERY

I. RELIEF REQUESTED

Defendants move this court for an order compelling plaintiffs to respond to interrogatories and requests for production.

II. STATEMENT OF FACTS

Plaintiffs were served with interrogatories and requests for production on December 11, 1986. Despite requests, plaintiffs have failed to respond to the discovery propounded to them.

III. STATEMENT OF ISSUES

Whether the court should compel plaintiffs to respond to discovery.

Whether the court should award costs and attorney's fees in bringing this motion.

////////

MOT/COMPEL DISCOVERY - 1

LEE, SMART, COOK, MARTIN & PATTERSON, P.S., INC.
ATTORNEYS AT LAW
800 WASHINGTON BUILDING
1325 FOURTH AVENUE
SEATTLE, WASHINGTON 98101
(206) 624-7980

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IV. EVIDENCE RELIED UPON

The moving party relies on the subjoined affidavit of Michael J. Bond.

V. AUTHORITY

Defendants rely on Civil Rules 26, 33 and 37.

VI. PROPOSED ORDER

A proposed form of order accompanies this motion.

DATED this 29 day of July, 1987.

LEE, SMART, COOK, MARTIN & PATTERSON, P.S., INC.

By Michael J. Bond
MICHAEL J. BOND of Attorneys
for Defendants

STATE OF WASHINGTON)) ss.
COUNTY OF KING)

MICHAEL J. BOND, being first duly sworn, upon oath deposes and says:

The following plaintiffs were each served with a set of Interrogatories and Request For Production on December, 11, 1986:

Kathy Lee Butler;

Stephen Lynn Butler;

Kathy Lee Butler, as guardian ad litem for Scott William Lien;

Kathy Lee Butler, as guardian ad litem for Randy William Lien;

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Sandi Lee Brown;
Lyle David Brown;
Dora Fellhauer, as guardian ad litem for Tara Lynn Brown;
Dora Fellhauer, as guardian ad litem for Troy Steven Brown;
Christine Hall; and,
Donald T. Hall.

To date, I have received no answers from any of the above-named plaintiffs to the discovery propounded to them on December 11, 1986.

The reasonable attorney's fees incurred in preparing this motion and appearing for argument are \$250.00.

FURTHER YOUR AFFIANT SAYETH NAUGHT.

Michael J. Bond
MICHAEL J. BOND

SUBSCRIBED and SWORN to before me this 30th day of July, 1987.

Donna E. McDonald
NOTARY PUBLIC in and for the
State of Washington.
My Appointment Expires: 6-13-91

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IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON FOR KING COUNTY

KATHY LEE BUTLER and STEPHEN)
LYNN BUTLER, wife and husband;)
et al.,)

NO. 86-2-18176-8

Plaintiffs,

v.

ORDER TO COMPEL DISCOVERY

DONALD LEE BARNETT and BARBARA)
BARNETT, husband and wife;)
et al.,)

Defendants.)

THIS MATTER having come on regularly for hearing before the undersigned on the Motion to Compel Discovery by defendants;

Defendants being represented by Michael J. Bond of Lee, Smart, Cook, Martin & Patterson, P.S., Inc., the plaintiffs being represented by Jeff Campiche of Kargianis & Austin;

The court having reviewed the motion and affidavit of Michael J. Bond,

having heard argument of counsel and being otherwise duly informed in the premises, the court does hereby

ORDER, ADJUDGE AND DECREE that the plaintiffs shall answer the interrogatories and requests for production propounded to them on December 11, 1986 within five (5) days of the date of entry of this order.

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Defendants shall be awarded costs in the amount of \$250.00.

JUDGE/COURT COMMISSIONER

Presented by:

LEE, SMART, COOK, MARTIN & PATTERSON

MICHAEL J. BOND, of Attorneys for
Defendants

Copy Received, Approved as to Form,
Notice of Presentation Waived:

KARGIANIS & AUSTIN

JEFF CAMPICHE, of Attorneys for
Plaintiffs

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KARGIANIS



SUPERIOR COURT OF WASHINGTON
COUNTY OF KING

12

KATHY LEE BUTLER and STEPHEN LYNN BUTLER, wife and husband;
et al.,
Plaintiffs,
v.

NO. 86-2-18176-8

DONALD LEE BARNETT and BARBARA BARNETT, husband and wife;
et al.,
Defendants.

NOTE FOR CIVIL MOTION CALENDAR
(Clerk's Action Required)

TO: THE CLERK OF THE COURT; and to all parties named below:

PLEASE TAKE NOTICE that an issue of law in this case will be heard on the date below and the Clerk is directed to note this issue on the Civil Motion Calendar.

DATE OF HEARING: Friday / August 7, 1987
(Day of Week) (Calendar Date)

TIME OF HEARING: 9:30 a.m. 1:30 p.m.

Summary Judgments Supplemental Proceedings
 Civil Motions

PLACE OF HEARING: KING COUNTY SUPERIOR COURT

NATURE OF MOTION: MOTION TO COMPEL DISCOVERY

DATED: July 29, 1987

Michael J. Bond
Typed Name: MICHAEL J. BOND

OF: LEE, SMART, COOK, MARTIN & PATTERSON

Attorney For: Defendants

Phone: (206) 624-7990

OTHER PARTIES REQUIRING NOTICE:
Fill In & Check Box If Backside Is Used []

Name: Jeff Campiche Name: _____

Address: Kargianis & Austin Address: _____
Columbia Center, 47th Floor
Seattle, WA 98104

Phone: 624-5370 Phone: _____

Attorney For: Plaintiffs Attorney For: _____

LEE, SMART, COOK, MARTIN & PATTERSON, P.S., INC.
ATTORNEYS AT LAW
800 WASHINGTON BUILDING
1325 FOURTH AVENUE
SEATTLE, WASHINGTON 98101
(206) 624-7990

NOTE FOR CIVIL MOTION CALENDAR

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**SUPERIOR COURT OF WASHINGTON
COUNTY OF KING**

KATHY LEE BUTLER and STEPHEN LYNN BUTLER,
wife and husband; et al.,

Plaintiffs,

v.

DONALD LEE BARNETT and BARBARA BARNETT,
husband and wife; et al.,

Defendants.

NO. 86-2-18176-8

**CERTIFICATE OF COMPLIANCE
[King County Local Rule 37]**

Pursuant to King County Local Rule 37, the undersigned states that he/~~she~~ has complied with said rule, involving Washington Court Rules of Civil Procedure, Rules 26 through 37, namely: CR26 and CR 33, with respect to the motion or objection filed herein, namely: defendants' Motion to Compel Discovery.

Compliance with Local Rule 37 has been met in the following manner:
See attached letter of Michael J. Bond to Jeff Campiche dated May 29, 1987, and response of Leslie Harris, legal assistant to Jeff Campiche dated June 1, 1987.

WHEREFORE, having fully complied with Local Rule 37, the undersigned respectfully enumerates the matters remaining for disposition by the Court to be as follows:

(1) For an Order with a deadline date of August 14, 1987 to include the following orders: requiring full and complete answers to defendants' interrogatories

(2) Said Order to also include an award for costs of \$ - and a reasonable attorney's fee in the sum of \$ 250.00 as reasonable expenses incurred in obtaining the orders requested herein, pursuant to CR 37(a)(4). Said total sum is requested to be assessed against plaintiffs

THE UNDERSIGNED certifies under penalty of perjury under the laws of the State of Washington that the facts contained herein with regard to compliance with Local Rule 37 are true and correct and that copies of this Certificate along with the motion or objection referred to above have been or will be served upon all required parties.

DATED this 29th day of July, 19 87.

Michael J. Bond
Type Name: MICHAEL J. BOND
OF Lee, Smart, Cook, Martin & Patterson
Attorney(s) For Defendants

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LEE, SMART, COOK, MARTIN & PATTERSON, P.S., INC.

ATTORNEYS AT LAW
800 WASHINGTON BUILDING
1325 FOURTH AVENUE
SEATTLE, WASHINGTON 98101
(206) 624-7990

FRED T. SMART
JOHN PATRICK COOK
DAVID L. MARTIN
NICHOLAS C. NEWMAN
MICHAEL A. PATTERSON
JOEL E. WRIGHT
STEPHEN L. HENLEY, SR.
RONALD C. GARDNER

JOHN W. SCHEDLER
JOHN O. POWERS
JOSEPH J. GANZ
EUGENE N. BOLIN, JR.
GAIL M. LUNDGREN
PHILIP B. GRENNAN
GARY A. TRABOLSI
LINDA F. KOWALSKI

MICHAEL J. BOND
STEVEN J. JAGER
JEFFREY P. DOWNER
CRAIG L. MCIVOR
LISA R. WORSWICK
NANCY C. ELLIOTT
AUGUST G. CIFELLI
THOMAS C. BIERLEIN
LINDA J. BAILEY
DUNCAN K. FOBES
TIMOTHY A. REID
LYNN R. McDONALD
CREIGHTON S. HUTCHINS
DAVID W. SWAN
W. SCOTT CLEMENT
ANN MARIE NEUGEBAUER

OF COUNSEL:
NELSON T. LEE

May 29, 1987

Mr. Jeff Campiche
Kargianis & Austin
47th Floor, Columbia Center
Seattle, WA 98104-7010

Re: Butler v. Barnett, et al

Dear Mr. Campiche:

Your clients' answers to interrogatories in the above-referenced case are well overdue. Please have the answers in my office by the close of business Friday, June 5, 1987.

I am available for a discovery conference any time during the week prior to June 5, 1987. Please call me in order to set a date.

I look forward to hearing from you soon.

Very truly yours,

Michael J. Bond

Michael J. Bond

MJB/yy

LAW OFFICES
KARGIANIS & AUSTIN

47TH FLOOR COLUMBIA CENTER
701 FIFTH AVENUE
SEATTLE, WASHINGTON 98104-7010

(206) 624-5370

TELECOPIER

(206) 624-8195

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LEE, SMART, COOK,
MARTIN AND PATTERSON

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WASHINGTON STATE AND
DISTRICT OF COLUMBIA BARS

**WASHINGTON STATE, IDAHO,
AND WISCONSIN BARS

ALL OTHERS WASHINGTON
STATE BAR ONLY

OF COUNSEL
MARSHA L. MARTIN
JEFF CAMPICHE

GEORGE KARGIANIS, PS
RUSSELL A. AUSTIN, JR.
RONALD P. ERICKSON
BRUCE A. WOLF
ANTHONY W. DOUGHERTY
MARK E. FORTIER
DAVID R. HALLOWELL
JOHN P. PAYSENO
JAMES F. BIAGI, JR.
JAMES E. GRAHAM
KEVIN COLUCCIO

June 1, 1987

Michael J. Bond, Esq.
Lee, Smart, et al.,
800 Washington Building
Seattle, WA 98101

Re: Butler et al. v. Barnett & Community Bible Chapel, et al.,

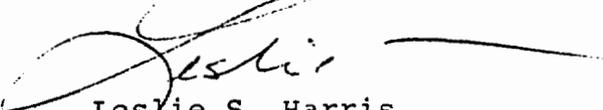
Dear Michael:

We are in receipt of your letter of May 29th regarding the
overdue interrogatories.

Please be advised that Jeff Campiche is out of town
for three weeks trying a case in Yakima.

I hope that you can afford us an extension on that basis.

Sincerely yours,
KARGIANIS & AUSTIN


Leslie S. Harris
Legal Assistant

cc: Jeff Campiche

AUG 12 1987

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KING COUNTY
SUPERIOR COURT CLERK

87-9-12054-1
JUDGMENT NUMBER

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IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON FOR KING COUNTY

KATHY LEE BUTLER and STEPHEN LYNN BUTLER, wife and husband; et al.,

Plaintiffs,

v.

DONALD LEE BARNETT and BARBARA BARNETT, husband and wife; et al.,

Defendants.

NO. 86-2-18176-8

ORDER TO COMPEL DISCOVERY

THIS MATTER having come on regularly for hearing before the undersigned on the Motion to Compel Discovery by defendants;

Defendants being represented by Michael J. Bond of Lee, Smart, Cook, Martin & Patterson, P.S., Inc., the plaintiffs being represented by Jeff Campiche of Kargianis & Austin;

The court having reviewed the motion and affidavit of Michael J. Bond,

having heard argument of counsel and being otherwise duly informed in the premises, the court does hereby

ORDER, ADJUDGE AND DECREE that the plaintiffs shall answer the interrogatories and requests for production propounded to them on December 11, 1986 within ~~five~~ ^{Ten (10)} days of the date of entry of this order.

ORDER TO COMPEL DISCOVERY - 1

LEE, SMART, COOK, MARTIN & PATTERSON, P.S., INC.
ATTORNEYS AT LAW
800 WASHINGTON BUILDING
1325 FOURTH AVENUE
SEATTLE, WASHINGTON 98101
(206) 624-7990

Filed 8-7-87

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Defendants shall be awarded costs in the amount of \$250.00. ✓

Robert M. Elston
JUDGE/COURT COMMISSIONER

Presented by:

LEE, SMART, COOK, MARTIN & PATTERSON

Michael J. Bond
MICHAEL J. BOND, of Attorneys for
Defendants

Copy Received, Approved as to Form,
Notice of Presentation Waived:

KARGIANIS & AUSTIN
Jeff Campiche
JEFF CAMPICHE, of Attorneys for
Plaintiffs