

OUT

IN THE MATTER OF
THE GUARDIANSHIP OF:

MAUREEN I'ANSON

CAUSE NUMBER
G 4419

<input type="checkbox"/> MINOR	<input checked="" type="checkbox"/> INCOMPETENT	<input type="checkbox"/> PERSON	<input type="checkbox"/> ESTATE
GUARDIAN		ATTORNEY	
		Robert R. Beezer	

DATE	RECEIVED OF:	FEE
5/2/75	Robert R. Beezer	32.00

REGISTRY	DISBURSED	RECEIVED

DATE	SUB. NO.	MEMORANDUM OF PROCEEDINGS	REEL	FRAME
5/2/75	1	Petition for appointment of Gdn.		
5/2/75	2	Notice of hearing 5/23/75		
5/20/75	3	Acknowledgement		
5/20/75	4	Notice of appearance		
5/23/75	5	Order setting case on 10/16/75		
5/23/75	6	Court check list		
5/23/75	7	Entered, continued to 10/16/75	prob	cal
9/5/75	7	Not. of Deposition		
9/8/75	8	Subpoena duces tecum		
9/8/75	9	Subpoena duces tecum		

SUPERIOR COURT - KING COUNTY - WASHINGTON
GUARDIANSHIP APPEARANCE DOCKET

DATE	SUB. NO.	MEMORANDUM OF DECISIONS	FILE	FRAME
9/8/75	10	Subpoena		
9/8/75	11	Subpoena		
9/8/75	12	Affidavits of service		
9/17/75	13	Stipulation and order for consolidation of trial		
10/15/75	14	Affidavit of service		
10/15/75	15	Affidavit of service		
10/15/75	16	Affidavit of service		
10/16/75	17	Petitioner's memorandum		
10/16/75	18	Incompetent's memorandum		
10/16/75	19	Court check list		
10/16/75	/	Entered hearing, petition for appointment of Hon. Donald Horowitz		
-----		Gdn. is dismissed. reporter Robert Carlton	1985	786
10/16/75	/	Entered hearing, referred to P.J. Dept.	prob	cal
10/21/75	20	Judgment of order denying letters without		6401186
-----		prejudice to future applications, and of		
-----		payments and distribution		
11/21/75	/	Reporter's notes, Vol:421, R. D. Carlton		

FILED

'75 MAY 2 PM 2:20

METTY J. MULLIN
CLERK
KING COUNTY WA.

MAY-25 10 22 AM '75

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28
29
30
31

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

In the Matter of the Guardianship)	IN PROBATE
of)	NO. <u>G 4419</u>
MAUREEN I'ANSON,)	PETITION FOR GUARDIAN OF
An Incompetent.)	ESTATE

COMES NOW Thomas I'Anson and petitioning for the appoint-
ment of a guardian of the estate of Maureen I'Anson, shows the
following:

1. Thomas I'Anson, the petitioner resides at 4014 Hunts Point Road, Bellevue, Washington and is the natural father of Maureen I'Anson.
2. Maureen I'Anson is of legal age and a resident of King County, Washington.
3. Maureen I'Anson is an incompetent person who is incapable of managing her property by reason of mental illness or by reason of other mental incapacity.
4. No person is now qualified as guardian of the person or estate of Maureen I'Anson in the State of Washington or in any other jurisdiction.
5. Petitioner seeks the appointment of any bank or trust company doing business in the City of Seattle to be guardian of the estate provided the guardian appointed by this court will signify its willingness to act.
6. The persons, so far as known by petitioner, who are

SHAW-WALKER & COMPANY, INC.
ATTORNEYS AT LAW
1000 4TH AVENUE
SEATTLE, WASHINGTON 98101

1 most closely related to Maureen I'Anson by blood or marriage are
2 the following:

3 (a) Thomas I'Anson (father)
4 4014 Hunts Point Road
5 Bellevue, Washington

6 (b) Marilyn I'Anson (mother)
7 11141 N. E. 62nd
8 Kirkland, Washington

9 7. Maureen I'Anson is not now in the care or custody of
10 any person or institution.

11 8. At a time when Maureen I'Anson was a minor, she was
12 involved in an automobile accident in the State of Alaska.
13 Maureen I'Anson sustained severe personal injury including the
14 loss of function in each of her limbs in such accident. As a
15 result of the injuries sustained and after lengthy legal pro-
16 ceedings including an appeal to the Supreme Court of Alaska,
17 the petitioner and his attorneys were successful in recovering
18 a sum in excess of one million dollars for and on behalf of
19 Maureen I'Anson. The said settlement proceeds have been dimin-
20 ished by the payment of costs, attorneys fees and by the de-
21 livery of \$34,200 to Maureen I'Anson. The balance of the settle-
22 ment proceeds are now invested in an interest bearing certi-
23 ficate of deposit under an agreement entered into March 25,
24 1975, by and between Maureen I'Anson, Thomas I'Anson and
25 Pacific National Bank of Washington as trustee. Said trust
26 agreement may be terminated or modified by agreement of the
27 parties or by an order of this court.

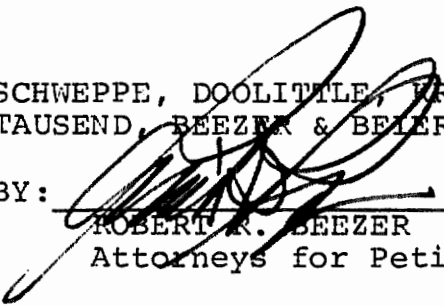
28 10. Subject to certain claims of Thomas I'Anson for in-
29 terest, reimbursement of expenses and for services rendered,
30 the settlement proceeds constitute a fund which will be re-
31 quired to pay for the medical treatment, nursing care, support

1 and maintenance of Maureen I'Anson for the balance of her
2 natural life.

3 11. Maureen I'Anson has consulted with spiritual ad-
4 visors and others and believes that her medical condition will
5 improve to the point where she will no longer be totally and
6 permanently disabled. In accordance with these views and the
7 religious convictions of Maureen I'Anson, she believes that
8 the settlement proceeds, or at least \$540,000 of such proceeds,
9 should be contributed to Community Chapel & Bible Training
10 Center, a Washington non-profit corporation, located at 18635
11 8th Avenue South, Seattle, Washington. A contribution of the
12 magnitude contemplated by Maureen I'Anson will cause her to
13 become either a charge on the bounty of her relatives or a
14 ward of the State, all in violation of petitioner's express
15 purpose and understanding with Maureen I'Anson in obtaining
16 an adequate personal injury settlement to assure the financial
17 security of his daughter.

18 WHEREFORE, petitioner prays that the court appoint a
19 suitable and proper guardian of the estate of Maureen I'Anson.

21 SCHWEPPE, DOOLITTLE, FRUG,
22 TAUSEND, BEEZER & BELERLE

23 BY: 
24 ROBERT R. BEEZER
25 Attorneys for Petitioner

26 STATE OF WASHINGTON)
27) SS.
28 COUNTY OF KING)

29 THOMAS I'ANSON, being first duly sworn on oath deposes and
30 says: He is the petitioner named in the above matter; he has

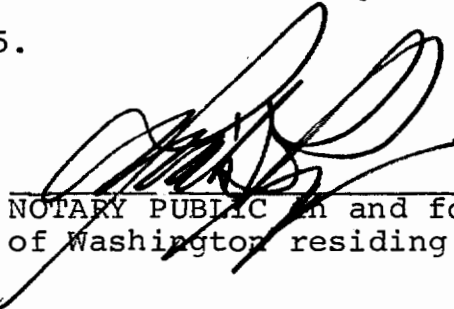
32
33
34
35
36
37
38
39
40
41
42
43
44
45
46
47
48
49
50
51
52
53
54
55
56
57
58
59
60
61
62
63
64
65
66
67
68
69
70
71
72
73
74
75
76
77
78
79
80
81
82
83
84
85
86
87
88
89
90
91
92
93
94
95
96
97
98
99
100

1 read the within and foregoing Petition for Guardian of Estate,
2 knows the contents thereof and believes the same to be true.

3
4 
5 THOMAS I'ANSON

6 SUBSCRIBED AND SWORN to before me this 30 day of

7 April, 1975.

8
9 
10 NOTARY PUBLIC in and for the State
11 of Washington residing at Seattle.

FILED

'75 MAY 2 PM 2:20

BETTY J. MULLEN
CLERK
KING COUNTY WA.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28
29
30
31

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

In the Matter of the Guardianship))	IN PROBATE
) of)	NO. 6 4419
) MAUREEN I'ANSON,)	NOTICE OF APPLICATION FOR
) An Incompetent)	LETTERS OF GUARDIANSHIP

A petition has been filed in this Court asking that letters of guardianship be issued to any bank or trust company doing business in the City of Seattle who has signified its willingness to act, as guardian of the estate of the above named person. Said petition will be heard on May 23, 1975, at 10:00 a.m. in the Probate Department of the above court, at which time any person interested may appear, file objections and contest the petition.

BETTY MULLEN, Clerk

BY: J. L. Rieker
Deputy

ROBERT R. BEEZER, of
SCHWEPPE, DOOLITTLE, KRUG,
TAUSEND, BEEZER & BEIERLE
1600 Peoples Bank Building
Seattle Washington 98171
Attorneys for Petitioner

Notice of Application for
Letters of Guardianship

RECORDED & INDEXED
MAY 2 1975
KING COUNTY CLERK
J. L. RIEKER
DEPUTY CLERK

COPY RECEIVED

MAY 20 1975

SCHWENPE, CO. ... KING COUNTY, WASHINGTON
OFFICE OF RECORDER

15 MAY 20 2 20

BETTY ... KING COUNTY, WASH.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28
29
30
31

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

In the Matter of the)	
Guardianship of)	IN PROBATE
)	NO. G 4419
MAUREEN I'ANSON,)	
)	ACKNOWLEDGEMENT OF SERVICE
An Incompetent)	

STATE OF WASHINGTON)	
)	SS.
COUNTY OF KING)	

MAUREEN I'ANSON, being first duly sworn on oath deposes and says:

That she is the person above named and does hereby acknowledge receipt of one true and correct copy of notice of application for Letters of Guardianship and petition for guardian of estate on a date more than ten (10) days prior to May 23, 1975.

Maureen I'Anson
MAUREEN I'ANSON

SUBSCRIBED AND SWORN to before me this 14th day of May, 1975.

Barbara E. Thrasher
NOTARY PUBLIC in and for the State of Washington residing at Seattle.

3

Acknowledgement of Service

STATE OF WASHINGTON
SUPERIOR COURT
KING COUNTY
SEATTLE, WASHINGTON

COPY RECEIVED
MAY 20 1975
SCHWEPPE, BOOLITTLE, KING, FAUSCH & BEEZER

FILED

75 MAY 20 11 2 25

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28
29
30
31
32

BETTY J. MULLEN
CLERK
KING COUNTY WA.

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

In the Matter of the Guardianship) In Probate No. G-4419
of)
MAUREEN I'ANSON,)
An Incompetent) NOTICE OF APPEARANCE

TO: Petitioner Thomas I'Anson and
TO: Robert R. Beezer, his attorney

YOU AND EACH OF YOU WILL PLEASE TAKE NOTICE that Maureen I'Anson hereby appears in the above entitled cause and requests that all further papers and pleadings herein, except original process, be served upon the undersigned Attorney at the address below stated.

Charles V. Moren

CHARLES V. MOREN

OFFICE AND POST OFFICE ADDRESS:

Charles V. Moren
Blackburn & Moren
815 N. E. Northgate Way
Seattle, Washington 98125
Telephone: 365-5500

BLACKBURN, MOREN & ROBINSON
ATTORNEYS AT LAW
815 N.E. NORTHGATE WAY, SUITE 204
SEATTLE, WASHINGTON 98125
TELEPHONE 365-5500

FILED

KING COUNTY, WASHINGTON

MAY 23 1975

BETTY J. MULLEN

SUPERIOR COURT CLERK

BY HEATHER HART
DEPUTY

M-2

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

Guardianship of
Plaintiff,

vs.
Margaret D'Anson
Defendant

No. G 4419
ORDER SETTING CASE

THIS MATTER having come on regularly to be heard in open court this day upon the motion of the ^{parties} ~~(plaintiff)~~ ~~(defendant)~~ for an order setting the date of trial in the above-entitled cause, and it appearing to the court that said cause is at issue and ready to be tried; now, therefore,

IT IS HEREBY ORDERED that the date of trial of the above-entitled cause is set for October 16, 1975.

DONE IN OPEN COURT this 23 day of May, 1975.

[Signature]
JUDGE - COMMISSIONER

Presented by:
[Signature]
Attorney for Plaintiff
~~Defendant~~

Approved as to form:
[Signature]
Attorney for Plaintiff
Defendant

Requested date is available:
[Signature]
Presiding Dept. Calendar Clerk
Case is Jury or Nonjury ✓
Estimated length of trial 7 days
Date case was noted _____
Nature of case Appointment of guardian

(File with Clerk in Presiding Judge's Department)

[Handwritten marks]

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

In the Matter of the
Guardianship of

MAUREEN I'ANSON

No. 6 4419

CHECK LIST FOR HEARING ON
GUARDIAN'S PETITION FOR
APPOINTMENT

Notice properly served Yes RCW 11.88.040

REMARKS, including action of court: (1) incompetent was Served
(2) NOT in care or custody of anyone (3) No Guardian

FILED
KING COUNTY, WASHINGTON
MAY 23 1975
BETTY J. MUELEN
SUPERIOR COURT CLERK
BY H. O. HOPKINS
DEPUTY

Initials of checker: JH

Date of check: MAY 22

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

*Copy rec'd
9/14
by Day*

In the Matter of the Guardianship
of
MAUREEN I'ANSON,
An Incompetent

No. G 4418

BETTY J. MILLER
CLERK
KING COUNTY WA

FILED
SEP 5 AM 10:30

NOTICE OF DEPOSITION
UPON ORAL EXAMINATION

TO: Maureen I'Anson


and to: Charles V. Moren, of Blackburn, Moren & Robinson, her attorneys

YOU, AND EACH OF YOU, WILL PLEASE TAKE NOTICE that the testimony of
Maureen I'Anson will be taken upon
Oral Examination at the instance and request of ~~the~~ Thomas I'Anson, petitioner in the
above-entitled and numbered action, before a Notary Public, at 1600 Peoples Bank Bldg.,
Seattle, Washington, on Monday the 15th day of September 19 75,
commencing at the hour of 3:00 o'clock p.m.; the said Oral Examination to be subject to
continuance or adjournment from time to time or place to place until completed, and to be taken on
the ground and for the reason the said witness will give evidence material to the establishment of the
petitioner's case.

DATED this 2nd day of September, 19 75

Office, Post Office Address and Telephone of
Attorneys Issuing Subpoena:

SCHWEPPE, DOOLITTLE, RAO, THAUSEND,
BEEZER & BEIERLE
1600 Peoples Nat'l Bank Bldg.
1415 Fifth Avenue
SEATTLE, WASHINGTON 98171


Notary Public in and for the State of Washington

DAVIS-IRWIN, CSR'S
& ASSOCIATES
Peoples National Bank Building
Suite 1525
Seattle, Washington 98171
623-7881



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

FILED
'75 SEP 8 AM 10:03
BETTY J. MULLEN
CLERK
KING COUNTY WA.

In the Matter of the Guardianship)
)
 of)
)
 MAUREEN I'ANSON,)
)
)
 An Incompetent)
)


IN PROBATE
NO. G 4419
SUBPOENA DUCES TECUM

THE STATE OF WASHINGTON, to: REV. DONALD BARNETT.

YOU ARE HEREBY COMMANDED to be and appear at the offices of Schweppe, Doolittle, Krug, Tausend, Beezer & Beierle, Attorneys at Law, 1600 Peoples National Bank Building, Seattle, Washington, on Friday, the 19th day of September, 1975, commencing at the hour of 2:00 o'clock P.m., on said day, then and there to testify as a witness at the request of Thomas I'Anson, petitioner in the above entitled cause, and to remain in attendance upon the undersigned until discharged. AND YOU ARE FURTHER COMMANDED to bring with you at said time and place the following books, papers, documents and tangible things, to wit: All balance sheets and other financial statements since the inception date of the Community Chapel and Bible Training Center, a Washington non-profit corporation; all correspondence from the Internal Revenue Service to the corporation; all federal tax returns since the inception date of the corporation; a list of all past and present members since date of inception of the corporation; a list of all past and present members of the Board of Trustees/Directors of the corporation since its inception date; the corporate minute book and any and all books, papers, records and documents explaining the organization and theology of the church.

HEREIN FAIL NOT AT YOUR PERIL

WITNESS my hand this 2nd day of September, 1975.


Notary Public in and for the State
of Washington

Address and Telephone of
Attorneys Issuing Subpoena:

Schweppe, Doolittle, Krug,
Tausend, Beezer & Beierle
1600 Peoples Bank Bldg.
Seattle, Wash. 98171
223-1600



Subpoena Duces Tecum

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

FILED

SEP 8 1975

BETTY J. MULLEN
Superior Court Clerk
KING COUNTY, WASH.

In the Matter of the Guardianship
of
MAUREEN I'ANSON,
An Incompetent

No. G 4419

**NOTICE OF DEPOSITION
UPON ORAL EXAMINATION**

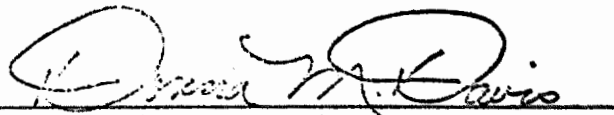
TO: Maureen I'Anson
and to: Charles V. Moren, of Blackburn, Moren & Robinson, her attorneys

YOU, AND EACH OF YOU, WILL PLEASE TAKE NOTICE that the testimony of
Rev. Donald Barnett will be taken upon
Oral Examination at the instance and request of ~~xxx~~ Thomas I'Anson, petitioner in the
above-entitled and numbered action, before a Notary Public, at 1600 Peoples Natl. Bank Bldg.
Seattle, Washington, on Friday the 19th day of September 19 75,
commencing at the hour of 2:00 o'clock P.M.; the said Oral Examination to be subject to
continuance or adjournment from time to time or place to place until completed, and to be taken on
the ground and for the reason the said witness will give evidence material to the establishment of the
petitioner's case.

DATED this 2nd day of September, 19 75

Office, Post Office Address and Telephone of
Attorneys Issuing Subpoena:

SCHWEPPE, DOOLITTLE, KRUG, THOMAS,
BEEZER & BEIERLE
1600 Peoples Nat'l Bank Bldg.
1415 Fifth Avenue
SEATTLE, WASHINGTON 98171


Notary Public in and for the State of Washington

DAVIS-IRWIN, CSR'S
& ASSOCIATES
Peoples National Bank Building
Suite 1525
Seattle, Washington 98171
623-7881

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

FILED
175 SEP
8 AM 10:03

BETTY J. MULLEN
CLERK
KING COUNTY WA.

In the Matter of the Guardianship)
of) IN PROBATE
MAUREEN I'ANSON,) NO. G 4419
An Incompetent) SUBPOENA DUCES TECUM

THE STATE OF WASHINGTON, to: RAY SIEBOLD.

YOU ARE HEREBY COMMANDED to be and appear at the offices of Schweppe, Doolittle, Krug, Tausend, Beezer & Beierle, Attorneys at Law, 1600 Peoples Bank Building, Seattle, Washington, on Tuesday, the 16th day of September, 1975, at the hour of 2:00 o'clock p.m. then and there to testify as a witness at the request of Thomas I'Anson, petitioner in the above entitled cause, and to remain in attendance upon the undersigned until discharged. AND YOU ARE FURTHER COMMANDED to bring with you at said time and place the following books, papers, documents and tangible things, to-wit: All balance sheets and other financial statements since the inception date of the Community Chapel and Bible Training Center, a Washington non-profit corporation; all correspondence from the Internal Revenue Service to the corporation; all federal tax returns since the inception date of the corporation; a list of all past and present members of the corporation since its date of inception; a list of all past and present members of the Board of Trustees/Directors of the corporation since its date of inception; the corporate minute book and any and all books, papers, records and documents explaining the organization and theology of the church.

HEREIN FAIL NOT AT YOUR PERIL.

WITNESS my hand this 2nd day of September, 1975.

Harvey Denmark
Notary Public in and for the State
of Washington.

Address and Telephone of
Attorneys Issuing Subpoena:

Robert R. Beezer
Schweppe, Doolittle, Krug,
Tausend, Beezer & Beierle
1600 Peoples Bank Building
Seattle, Washington 98171
223-1600

9

Subpoena Duces Tecum

IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON

IN AND FOR THE COUNTY OF KING

FILED
SEP 8 1975

In the Matter of the Guardianship
of
MAUREEN I'ANSON

An Incompetent

BETTY J. MULLEN
Superior Court Clerk
KING COUNTY, WASH.

No. G. 4419

**NOTICE OF DEPOSITION
UPON ORAL EXAMINATION**

TO: Maureen I'Anson

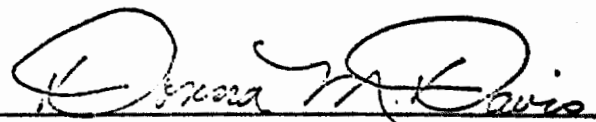
and to: Charles V. Moren, of Blackburn, Moren & Robinson, her attorneys

YOU, AND EACH OF YOU, WILL PLEASE TAKE NOTICE that the testimony of
Ray Siebold will be taken upon
Oral Examination at the instance and request of ~~xxx~~ Thomas I'Anson, petitioner in the
above-entitled and numbered action, before a Notary Public, at 1600 Peoples Natl. Bank Bldg.
Seattle, Washington, on Tuesday the 16th day of September 1975,
commencing at the hour of 2:00 o'clock P.M.; the said Oral Examination to be subject to
continuance or adjournment from time to time or place to place until completed, and to be taken on
the ground and for the reason the said witness will give evidence material to the establishment of the
petitioner's case.

DATED this 2nd day of September, 1975.

Office, Post Office Address and Telephone of
Attorneys Issuing Subpoena:

Schweppe, Doolittle, Krug,
Tausend, Beezer & Beierle
Robert R. Beezer
1600 Peoples Bank Bldg.
Seattle, Wash. 98171
223-1600


Notary Public in and for the State of Washington

DAVIS-IRWIN, CSR'S
& ASSOCIATES
Peoples National Bank Building
Suite 1525
Seattle, Washington 98171
623-7881

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

175 SEP 8 AM 10:03
FILED
BETTY J. MULLEN
CLERK
KING COUNTY W.A.

In the Matter of the Guardianship
of
MAUREEN I'ANSON,
An Incompetent

No. G 4419

SUBPOENA

THE STATE OF WASHINGTON, to: JACK DuBOIS

GREETINGS:

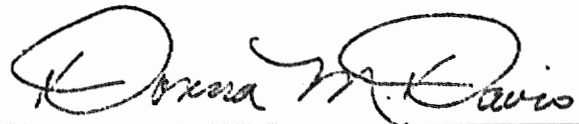
YOU ARE HEREBY COMMANDED to be and appear at the offices of
Schweppe, Doolittle, Krug, Tausend, Beezer & Beierle; 1600 Peoples Bank
Building, Seattle, Washington, on Thursday, the 18th day of
September at the hour of 2:00 o'clock p.m., of said day, then and there
to testify as a witness at the request of the petitioner, Thomas I'Anson
in the above-entitled cause, and to remain in attendance upon the undersigned or other Notary Public
until discharged; and

HEREIN FAIL NOT AT YOUR PERIL

WITNESS my hand and official seal this 2nd day of September, 19 75

Office, Post Office Address and Telephone of
Attorneys Issuing Subpoena:

Robert R. Beezer
Schweppe, Doolittle, Krug,
Tausend, Beezer & Beierle
1600 Peoples Bank Bldg.
Seattle, Wash. 98171
223-1600



Notary Public in and for the State of Washington

DAVIS-IRWIN, CSR'S
& ASSOCIATES
Peoples National Bank Building
Suite 1525
Seattle, Washington 98171
623-7881

10

IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON

IN AND FOR THE COUNTY OF KING

FILED
SEP 8 1975

In the Matter of the Guardianship
of
MAUREEN I'ANSON,
An Incompetent

BETTY J. MULLEN
Superior Court Clerk
KING COUNTY, WASH.

No. G 4419

**NOTICE OF DEPOSITION
UPON ORAL EXAMINATION**


TO: Maureen I'Anson
and to: Charles V. Moren, of Blackburn, Moren & Robinson, her attorneys

YOU, AND EACH OF YOU, WILL PLEASE TAKE NOTICE that the testimony of
Jack DuBois will be taken upon
Oral Examination at the instance and request of ~~the~~ Thomas I'Anson, petitioner in the
above-entitled and numbered action, before a Notary Public, at 1600 Peoples Bank Bldg.,
Seattle, Washington, on Thursday the 18th day of September 19 75,
commencing at the hour of 2:00 o'clock p.m.; the said Oral Examination to be subject to
continuance or adjournment from time to time or place to place until completed, and to be taken on
the ground and for the reason the said witness will give evidence material to the establishment of the
petitioner's case.

DATED this 2nd day of September, 1975.

Office, Post Office Address and Telephone of
Attorneys Issuing Subpoena:

Robert R. Beezer
Schweppe, Doolittle, Krug,
Tausend, Beezer & Beierle
1600 Peoples Bank Bldg.
Seattle, Washington 98171
223-1600


Notary Public in and for the State of Washington

DAVIS-IRWIN, CSR'S
& ASSOCIATES
Peoples National Bank Building
Suite 1525
Seattle, Washington 98171
623-7881

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

In the Matter of the Guardianship
of
MAUREEN I'ANSON,
An Incompetent

No. G 4219

SUBPOENA

FILED
175 SEP 8 AM 10:03
KING COUNTY WA.
DETTMERS
NOTARY PUBLIC

THE STATE OF WASHINGTON, to: DENNIS PANGBURN

GREETINGS:

YOU ARE HEREBY COMMANDED to be and appear at the offices of
Schweppe, Doolittle, Krug, Tausend, Beezer & Beierle, 1600 Peoples
Bank Bldg.,, Seattle, Washington, on Monday, the 15th day of
September, 1975 at the hour of 2:00 o'clock p.m., of said day, then and there
to testify as a witness at the request of the petitioner, Thomas I'Anson
in the above-entitled cause, and to remain in attendance upon the undersigned or other Notary Public
until discharged;~~and~~

HEREIN FAIL NOT AT YOUR PERIL

WITNESS my hand and official seal this 2nd day of September, 1975.

Office, Post Office Address and Telephone of
Attorneys Issuing Subpoena:

SCHWEPPE, DOOLITTLE, KRUG, TAUSEND,
BEEZER & BEIERLE
1600 Peoples Nat'l Bank Bldg.
1415 Fifth Avenue
SEATTLE, WASHINGTON 98171


Notary Public in and for the State of Washington

DAVIS-IRWIN, CSR'S
& ASSOCIATES
Peoples National Bank Building
Suite 1525
Seattle, Washington 98171
623-7881

IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON

IN AND FOR THE COUNTY OF KING

FILED
SEP 8 1975

BETTY J. MULLEN
Superior Court Clerk
KING COUNTY, WASH.

In the Matter of the Guardianship
of
MAUREEN I'ANSON,
An Incompetent

No. G 4419

NOTICE OF DEPOSITION
UPON ORAL EXAMINATION


TO: Maureen I'Anson,
and to: Charles V. Moren, of Blackburn, Moren & Robinson, her attorneys

YOU, AND EACH OF YOU, WILL PLEASE TAKE NOTICE that the testimony of
DENNIS PANGBURN will be taken upon
Oral Examination at the instance and request of ~~the~~ Thomas I'Anson, petitioner in the
above-entitled and numbered action, before a Notary Public, at 1600 Peoples Bank Bldg.,
Seattle, Washington, on Monday the 15th day of September 19 75,
commencing at the hour of 2:00 o'clock p.m.; the said Oral Examination to be subject to
continuance or adjournment from time to time or place to place until completed, and to be taken on
the ground and for the reason the said witness will give evidence material to the establishment of the
petitioner's case.

DATED this 2nd day of September, 19 75

Office, Post Office Address and Telephone of
Attorneys Issuing Subpoena:

SCHWEPPE, DOOLITTLE, KRUG, THOMPSON,
BEEZER & BEIERLE
1600 Peoples Nat'l Bank Bldg.
1415 Fifth Avenue
SEATTLE, WASHINGTON 98171


Notary Public in and for the State of Washington

DAVIS-IRWIN, CSR'S
& ASSOCIATES
Peoples National Bank Building
Suite 1525
Seattle, Washington 98171
623-7881

IN THE MATTER OF THE GUARDIANSHIP OF

AFFIDAVIT OF SERVICE OF

MAUREEN I'ANSON, An Incompetent

vs.

Plaintiff

Defendant

Garnishee Defendant

SUBPOENA FOR DEPOSITION: NOTICE OF DEPOSITION UPON ORAL EXAMINATION 9/15/75 @ 2:00 p.m.

FILED
4:15 SEP 8 AM 10:00
KING COUNTY WA
BETTY J. MULLEN
CLERK

State of Washington

County of King

ss.

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 9/4/75 at 9:10A M., at 18635 - 8th South, Seattle

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

Dennis Pangburn

by then and there personally delivering a true and correct copy thereof into the hands of and leaving same with

Dennis Pangburn

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

by then and there, at the residence and usual place of abode of said person, personally delivering a true and correct copy thereof into the hands of and leaving the same with

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.

Subscribed and Sworn to before me 9/4/75

S. Koch

NOTARY PUBLIC in and for the State of Washington, residing at Seattle

Service Fees 4.00 Travel 1.00 Notary Fee 1.00 Cert. Mail 5.00 Total \$ 5.00

IN THE MATTER OF THE GUARDIANSHIP OF

AFFIDAVIT OF SERVICE OF

MAUREEN I'ANSON, An Incompetent
vs.

Plaintiff

Defendant

Garnishee Defendant

NOTICE OF DEPOSITION UPON ORAL EXAMINATION: SUBPOENA FOR DEPOSITION
9/18/75 @ 2:00 p.m.

FILED
15 SEP 8 AM 10 1975
KING COUNTY WA
BETTY J. MULLER
CLERK

State of Washington }
County of King } ss.

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 9/4/75 at 9:00A M., at 18635 - 8th South, Seattle

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

Jack Dubois

by then and there personally delivering a true and correct copy thereof into the hands of and leaving same with

Jack Dubois

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

by then and there, at the residence and usual place of abode of said person _____, personally delivering a true and correct copy thereof into the hands of and leaving the same with _____

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.

Subscribed and Sworn to before me 9/4/75

S. Koch

S. Koch

NOTARY PUBLIC in and for the State of Washington, residing at Seattle

Service Fees 4.00 Travel 3.80 Notary Fee 1.00 Cert. Mail _____ Total \$ 8.80

RESIDENCE SERVICE

IN THE MATTER OF THE GUARDIANSHIP OF

MAUREEN I'ANSON, An Incompetent
vs.

Plaintiff

Defendant

Garnishee Defendant

AFFIDAVIT OF SERVICE OF

NOTICE OF DEPOSITION UPON ORAL
EXAMINATION: SUBPOENA DUCES TECUM
FOR DEPOSITION
9/16/75 @ 2:00 p.m.

State of Washington

County of King

ss.

BETTY J. MULLEN
CLERK
KING COUNTY WA

75 SEP 8 AM 1975

FILED

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 9/4/75 at 9:00A M., at 18635 - 8th South, Seattle

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

Ray Siebold

by then and there personally delivering a true and correct copy thereof into the hands of and leaving same with

Ray Siebold

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

by then and there, at the residence and usual place of abode of said person _____, personally delivering a true and correct copy thereof into the hands of and leaving the same with _____

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.

Subscribed and Sworn to before me 9/4/75

S. Koch
S. Koch

NOTARY PUBLIC in and for the State
of Washington, residing at Seattle

Service Fees 4.00 Travel _____ Notary Fee 1.00 Cert. Mail _____ Total \$ 5.00

IN THE MATTER OF THE GUARDIANSHIP OF

AFFIDAVIT OF SERVICE OF

MAUREEN I'ANSON, An Incompetent

vs.

Plaintiff

Defendant

Garnishee Defendant

NOTICE OF DEPOSITION UPON ORAL EXAMINATION: SUBPOENA FOR DEPOSITION (DUCES TECUM) 9/19/75 @ 2:00 p.m.

State of Washington

County of King

ss.

75 SEP 23 AM 10:03 FILED KING COUNTY WA BETTIE G. BULLEN CLERK

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 9/4/75 at 9:00A M., at 18635 - 8th South, Seattle

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

Reverend Donald Barnett

by then and there personally delivering a true and correct copy thereof into the hands of and leaving same with

Reverend Donald Barnett

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

by then and there, at the residence and usual place of abode of said person _____, personally delivering a true and correct copy thereof into the hands of and leaving the same with _____

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.

Subscribed and Sworn to before me 9/4/75

S. Koch
S. Koch

NOTARY PUBLIC in and for the State of Washington, residing at Seattle

Service Fees 4.00 Travel _____ Notary Fee 1.00 Cert. Mail _____ Total \$ 5.00

'75 SEP 17 AM 10 00

BETTY J. MULLEN
CLERK
KING COUNTY WA.

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

In the Matter of the Guardianship)

of MAUREEN I'ANSON,)

An Incompetent,)

and)

GERTRUDE JANE STEWART,)

Plaintiff,)

vs.)

THOMAS I'ANSON,)

Defendant.)

NO. G - 4419 ✓

NO. 799146

STIPULATION AND ORDER
OF CONSOLIDATION

COME NOW the parties to the above captioned proceedings by their respective attorneys, and stipulate and agree that the trial of the merits of Cause No. G-4419 and Cause No. 799146 shall be consolidated for trial on the date of October 16, 1975, which has already been established by the Court.

DATED this 2nd day of September, 1975.

Charles V. Moren
Charles V. Moren
Of Blackburn & Moren
Attorneys for Maureen I'Anson

Robert R. Beezer
Robert R. Beezer
Of Schweppe, Doolittle, Krug,
Tausend, Beezer & Beierle
Attorneys for Thomas I'Anson

John P. Mucklestone
John P. Mucklestone
Of Mucklestone & Mucklestone
Attorneys for Gertrude Jane Stewart

13

1 ORDER OF CONSOLIDATION FOR TRIAL

2 THIS MATTER having come on regularly before the undersigned
3 Judge of the above entitled Court upon the foregoing stipulation of
4 counsel and the Court being fully advised in the premises, NOW,
5 THEREFORE,
6

7 IT IS ORDERED that Cause No. G-4419 and Cause No. 799146 are
8 and shall be consolidated for the purposes of trial on October 16,
9 1975, which date has already been established by the Court.

10 DONE IN OPEN COURT this 17 day of September, 1975.

11
12 
13 ~~Judge~~ Court Commissioner

14 Presented by:

15 MUCKLESTONE & MUCKLESTONE

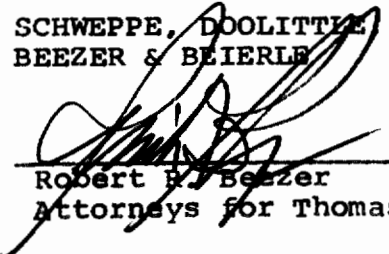
16 
17 John P. Muckleston
18 Attorneys for Gertrude Jane Stewart

19
20 Notice of Presentation Waived:

21 BLACKBURN & MOREN

22 
23 Charles V. Moren
24 Attorneys for Maureen I'Anson

25 SCHWEPPE, DOOLITTLE KRUG, TAUSEND,
26 BEEZER & BEIERLE

27 
28 Robert B. Beezer
29 Attorneys for Thomas I'Anson

30
31
32 Stipulation and Order of Consolidation -2

IN THE MATTER OF THE GUARDIANSHIP

AFFIDAVIT OF SERVICE OF

OF
MAUREEN I'ANSON, vs. Plaintiff
An Incompetent, Defendant
Garnishee Defendant

SUBPOENA TRIAL, 10/16/75, 9:30am

FILED
OCT 15 11 00
BETTY J. MILLER
KING COUNTY WA.

State of Washington }
County of King } ss.

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 10/10/75 at 9:00A M., at 18635 - 8th South, Seattle,

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

by then and there personally delivering a true and correct copy thereof into the hands of and leaving same with Ray Siebold

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

by then and there, at the residence and usual place of abode of said person _____, personally delivering a true and correct copy thereof into the hands of and leaving the same with _____

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.

Subscribed and Sworn to before me 10/12/75 S. Koch 3

NOTARY PUBLIC in and for the State of Washington, residing at Seattle

Service Fees 3.00 Travel _____ Notary Fee 1.00 Cert. Mail _____ Total \$ 4.00

RESIDENCE SERVICE

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28
29
30
31

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

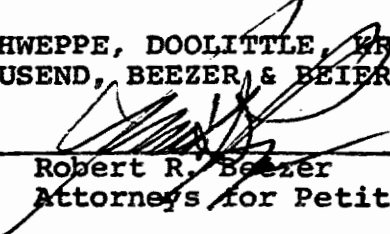
In the Matter of the Guardianship)
) NO. G 4419
) SUBPOENA
)
)
)
)
)
)
)
)
)
)
)

THE STATE OF WASHINGTON, TO: RAY SIEBOLD

GREETINGS: You are hereby commanded to appear in the
courtroom of the Presiding Judge, of the Superior Court of the
State of Washington, Room No. E942, King County Courthouse,
Third and James, Seattle, Washington 98104, at 9:30 o'clock
A.M., on the 16th day of October, 1975, then and there to give
evidence in a certain cause wherein Thomas I'Anson is the
petitioner in the above referenced guardianship; and to remain
in attendance on said Court until discharged.

HEREIN FAIL NOT AT YOUR PERIL.

Dated at Seattle, Washington, this 8th day of October,
1975.

SCHWEPPE, DOOLITTLE, KRUG,
TAUSEND, BEEZER & BEIERLE
BY 
Robert R. Beezer
Attorneys for Petitioner

Subpoena

SCHWEPPE, DOOLITTLE, KRUG, TAUSEND
BEEZER & BEIERLE
1600 PEOPLES NATIONAL BANK BUILDING
1415 FIFTH AVENUE
SEATTLE, WASHINGTON 98171
223-1800

In the SUPERIOR Court, for KING County, State of Wash. No. G 4419

IN THE MATTER OF THE GUARDIANSHIP
OF

AFFIDAVIT OF SERVICE OF

MAUREEN I'ANSON,
An Incompetent,

vs.

Plaintiff

SUBPOENA
TRIAL, 10/16/75, 9:30am

Defendant

Garnishee Defendant

State of Washington

ss.

County of King

FILED
OCT 15 AM 11
BETTY J. MILLER
KING COUNTY WA

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 10/10/75 at 9:00A M., at 18635 - 8th S., Seattle

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

Jack Dubois

by then and there personally delivering a true and correct copy thereof into the hands of and leaving same with

Jack Dubois

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

by then and there, at the residence and usual place of abode of said person _____, personally delivering a true and correct copy thereof into the hands of and leaving the same with _____

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.

Subscribed and Sworn to before me 10/12/75

S. Koch
S. Koch

3

NOTARY PUBLIC in and for the State
of Washington, residing at Seattle

Service Fees 3.00 Travel _____ Notary Fee 1.00 Cert. Mail _____ Total \$ 4.00

AFFIDAVIT OF SERVICE

1
2
3
4 IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON
FOR KING COUNTY

5 In the Matter of the Guardianship)
6 of) NO. G 4419
7 MAUREEN I'ANSON,) SUBPOENA
8 An Incompetent)
9


10 THE STATE OF WASHINGTON, TO: JACK DuBOIS

11 GREETINGS: You are hereby commanded to appear in the
12 courtroom of the Presiding Judge, of the Superior Court of the
13 State of Washington, Room No. E942, King County Courthouse,
14 Third and James, Seattle, Washington 98104, at 9:30 o'clock
15 A.M., on the 16th day of October, 1975, then and there to give
16 evidence in a certain cause wherein Thomas I'Anson is the
17 petitioner in the above referenced guardianship; and to remain
18 in attendance on said Court until discharged.

19 HEREIN FAIL NOT AT YOUR PERIL.

20 Dated at Seattle, Washington, this 8th day of October,
21 1975.

22 SCHWEPPE, DOOLITTLE, KRUG,
23 TAUSEND, BEEZER & BEIERLE

24 BY 
25 Robert R. Beezer
26 Attorneys for Petitioner

27
28
29
30 Subpoena

31 SCHWEPPE, DOOLITTLE, KRUG, TAUSEND
BEEZER & BEIERLE
1800 PEOPLES NATIONAL BANK BUILDING
1415 FIFTH AVENUE
SEATTLE, WASHINGTON 98171
223-1600

IN THE MATTER OF THE GUARDIANSHIP
OF

AFFIDAVIT OF SERVICE OF

MAUREEN I'ANSON,
An Incompetent,

vs.

Plaintiff

SUBPOENA
TRIAL, 10/16/75, 9:30am

Defendant

Garnishee Defendant

State of Washington

County of King

ss.

FILED
OCT 15 AM 11 00
BETTIE J. MULLEN
CLERK
KING COUNTY WA.

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 10/10/75 at 9:00A M., at 18635 - 8th South, Seattle

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

by then and there personally delivering a true and correct copy thereof into the hands of and leaving same with
Dennis Pangburn

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

by then and there, at the residence and usual place of abode of said person _____, personally delivering a true and correct copy thereof into the hands of and leaving the same with _____

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.

Subscribed and Sworn to before me 10/12/75

S. Koch

3

NOTARY PUBLIC in and for the State
of Washington, residing at Seattle

Service Fees 3.00 Travel 5.70 Notary Fee 1.00 Cert. Mail _____ Total \$ 9.70

AFFIDAVIT OF SERVICE

RESIDENCE SERVICE

FILED

KING COUNTY, WASHINGTON

OCT 10 1975

BETTY J. MULLEN
SUPERIOR COURT CLERK
BY LORETTA M. PYNE
DEPUTY

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

In the Matter of the Guardianship))	IN PROBATE
) of))	NO. G-4419
) MAUREEN I'ANSON,))	PETITIONER'S MEMORANDUM
) An Incompetent))	OF AUTHORITY IN SUPPORT
)))	OF PETITION FOR LETTERS

Maureen I'Anson Pangburn, during her minority, was involved in an automobile collision as a result of which she is now a quadraplegic. After several years of litigation including an appeal to the Supreme Court of Alaska, insurance settlements generated in excess of \$650,000 in damages. These funds are now available for distribution to Maureen. All attorneys fees and costs of suit have been paid.

The compensation which Maureen I'Anson will receive is a recognition by the insurance carrier of the fact that jury verdicts of great magnitude reflect the basic compassion of society when confronted with a severely injured person. However, an unfortunate aspect of large lump sum payments to successful plaintiffs is that, in many instances, if not most, the plaintiff is unsophisticated and tends to fall prey to unwise investments. Accordingly, many such plaintiffs who have been compensated with a view toward assuring their financial security throughout the balance of a life of physical disability are impoverished within a year or two, and, hence, the course of justice is frustrated. Neither the laws of Washing-

1 ton and Alaska nor the law of any other jurisdiction make
2 periodic payment of such compensation mandatory. Conservator-
3 ships are designed to protect the improvident in some juris-
4 dictions.

5 In the instant case, Maureen I'Anson has repeatedly ex-
6 pressed the intention to divest herself of a substantial portion
7 of her damage award and to give such proceeds to the Community
8 Chapel and Bible Training Center which was incorporated in the
9 State of Washington on or about November 2, 1967. Such a gift
10 will completely defeat the interests of society and of Maureen
11 I'Anson. Such a gift will completely defeat the purposes for
12 which the law has made compensation available. Such a gift will
13 constitute a breach of fiduciary duty which Maureen I'Anson owes
14 to society. If impoverished after the making of such a gift,
15 the donor may well become a charge to public welfare or de-
16 pendent upon the good will of her family for necessary support
17 and care.

18 We suggest that this court fashion a remedy which recog-
19 nizes the basic interests of Maureen, her church, her family
20 and society. We suggest periodic disbursement of such funds
21 subject to the continuing equitable jurisdiction of this court.
22 To accomplish this it is necessary to have a guardian of her
23 estate, and such an appointment is proper.

24 I. GUARDIANSHIP

25 The authority for appointment of guardians is codified
26 at RCW 11.88.010 which says:

27 The superior court of each county shall have power
28 to appoint guardians for the persons and estates, or
29 either thereof, of incompetent persons resident of
the county, and guardians for the estates of all
such persons who are nonresidents of the state but

1 who have property in such county needing care and
2 attention.

3 An "incompetent" is any person who is either

- 4 (1) Under the age of majority, as defined in
RCW 11.92.010, or
- 5 (2) Incapable by reason of insanity, mental
6 illness, imbecility, idiocy, senility,
7 habitual drunkenness, excessive use of
8 drugs, or other mental incapacity, of
9 either managing his property or caring for
10 himself or both.

11 Opinions of the Washington Supreme Court have consistently
12 interpreted RCW 11.88.010 to permit the appointment of a guard-
13 ian for the estate of a person who is incapable of managing his
14 property by reason of mental unsoundness. It is not necessary
15 to find mental illness to a degree requiring committment.

16 In re Ervay, 64 Wash. 138, 116 Pac. 591 (1911) is concerned
17 with a person who was severely influenced by spiritual advisers.
18 Approving the appointment of a guardian, the court says (p.140):

19 ~~Mr. Ervay~~ seems unable to resist the blandish-
20 ments of those who approach her professing an
21 interest in her spiritual welfare. She first
22 became a victim of a so-called spiritual medium,
23 who soon possessed himself of all her ready
24 cash and a power of attorney from her authorizing
25 him to transact her general business. It was only
26 by the interference of her family that the in-
27 fluence of the person over her was counteracted
28 and the management of her property returned to her
29 own hands. Later she met with a discredited bap-
30 tist preacher who succeeded in obtaining from her
31 large sums of money, ostensibly for church work,
but which seem to have been largely retained by the
preacher for his own private use. These, with other
matters appearing in the record, make it clear to
our minds that unless the management of her affairs
is conducted through the courts her considerable
fortune will be taken from her and she will become
either a charge on the bounty of her relatives or
a ward of the state. The orders appealed from should
be affirmed, and it is so directed. (Emphasis added).

32 In re Bayer's Estate, 101 Wash. 694, 172 Pac. 842 (1918),
33 lays down the classic test employed to determine the need for
34 a guardian and at page 695, the court says:

35 Pet. Memo. of Authority
36 in Support of Petition
37 for Letters - page 3.

1 The rule which is generally supported by the
2 authorities is stated in 22 Cyc., page 1139,
as follows:

3 "Generally speaking the test of whether a
4 guardian should be appointed for the estate of
5 a person is whether mental unsoundness exists
6 to such a degree that he is incapable of con-
7 ducting the ordinary affairs of life, so that
8 to leave his property in his possession and
control would render him liable to become the
victim of his own folly or of the fraud of
others. It is not necessary in most states
that the person should be an idiot or a luna-
tic in the strict sense of those terms. . ."

9 After discussing conduct showing the susceptibility of Mrs.
10 Bayer to irrational business transactions, the court continues
11 (p. 698):

12 It is not claimed, either by her or by her brother,
13 who was the beneficiary of the transaction, that
14 it was intended to be anything else than a pure
15 business transaction. An improvident business
16 transaction may be competent evidence in support
of an application for a guardianship, and should
be taken into consideration, in connection with
all the other evidence in the case, in determining
the question of mental incompetency. Shelby v.
Farve, 33 Okl. 651, 126 Pac. 764; In re Chappel's
17 Estate, 189 Mich. 526, 155 N. W. 569.

18 In the case last cited it was said:

19 "An improvident business transaction may be
20 competent evidence in support of an application
21 for guardianship; most of the acts of a respondent
22 in such a case are competent as going to show
23 the mental condition. But such an improvident
act becomes cogent proof of mental incompetency
only as it is reinforced and explained by other
facts and circumstances".

24 The court, in In re Pfeiffer, 10 Wn.2d 703, 118 P.2d 158
25 (1941), makes the distinction between insanity and the dis-
26 ability sufficient to support the appointment of a guardian.
27 Even though Mr. Pfeiffer was found sufficiently competent to
28 be discharged from the state mental hospital, the court finds
29 the continuation of guardianship proper. At page 716 the court
30 says:

31 Pet. Memo. of Authority
in Support of Petition
for Letters - page 4.

1 We have recognized in this state the difference
2 between "insanity" and mental competency to handle
3 one's business affairs. In the case of In re
4 Bayer's Estate, 101 Wash. 694, 172 Pac. 842, we
reversed an order of the lower court refusing to
appoint a guardian for an incompetent person,
therein stating:

5 "The question to be determined upon this appeal is
6 not whether Mrs. Bayer was insane, but whether she
7 was incapable of managing her business affairs by
reason of mental unsoundness."

8 The same guardianship matter was again before us
9 in 111 Wash. 276, 190 Pac. 323, and we again re-
versed an order of the lower court holding that
10 the guardian should be discharged. We there
stated:

11 "We do not think it profitable to discuss the
12 evidence at length. It was directed mainly to
13 the question of the sanity of Mrs. Bayer. While
14 it establishes, in our opinion, the fact that she
15 is not insane in the sense that she requires con-
finement, or requires the supervision of a guard-
ian over her person, we think it falls far short
of establishing that she is competent to manage
her property interests, or as the statute has it,
'capable of managing her own affairs.'"

16 We are therefore of the opinion that the order of
17 May 10, 1941, entered in the insanity proceedings
18 (No. 28484), should be vacated, and an order entered
19 to the effect that George Pfeiffer has been restored
20 to sanity, without reference to any adjudication
as to his mental competency to handle his business
affairs, and without reference to the guardian or
to the guardianship proceedings.

21 Generally, the question of disability is discussed in
22 Anno. - Incompetent - Guardianship 17 ALR 1065 (1922) and
23 Anno. - Incompetent - Guardian - Mental State 9 ALR 3rd 774
24 (1966).

25 II. THE FIDUCIARY RELATIONSHIP

26 There is no uniform practice among the courts in the use
27 of the terms "fiduciary relation" and "confidential relation".
28 In many decisions, the words are used as synonymous. In most
29 cases however, the terms are used in connection with recognized

1 relationships that exist in trusts, estates, partnerships,
2 corporations, attorneys and agency. These branches of the law
3 have distinctive names but the term fiduciary is not necessarily
4 restricted in its application to the relationships arising in
5 those fields.

6 Here we propose that the court consider the application
7 of fiduciary principles to the conduct of Maureen I'Anson with
8 respect to settlement proceeds derived from the State of
9 Alaska for her care and also to the conduct of The Community
10 Chapel and Bible Training Center with respect to the acceptance
11 of a gift of a substantial portion of such proceeds.

12 In Salhinger v. Salhinger, 56 Wash. 134, 105 Pac. 236
13 (1909) the court is dealing with the dissolution and settlement
14 of a partnership. We cite the case for the equitable principles
15 there laid down and applied to those in the fiduciary relation-
16 ship. At page 138, the court says:

17 It was, therefore, the duty of Henry Salhinger,
18 in effecting a settlement with his brother, to
19 disclose to him fully the condition of the part-
20 nership affairs, so that in determining the nature
21 and terms of his settlement Samuel might be as
22 fully apprised of the real facts and true condition
23 as Henry himself. This, according to the petition,
24 he did not do; rather is it charged he sought to
25 conceal the true situation; and knowing his
26 brother's physical and mental weakness, he kept
27 him away from his friends and advisers, mis-
28 representing the true condition of the partner-
29 ship business, asserting as a failure and profitless
30 concern that which it is said in truth was pros-
31 perous and of the value of \$60,000. The advantage
thus gained the law will not permit to be retained;
for, as is said in Roby v. Colehour, 135 Ill. 300,
337, 25 N. E. 777, quoting Mr. Pomeroy:

"Whenever two persons stand in such a relation that,
while it continues, confidence is necessarily re-
posed by one, and the influence which naturally
grows out of that confidence is abused, or the
influence is exerted to obtain an advantage at the
expense of the confiding party, the person availing
himself of his position will not be permitted to re-
tain the advantage, although the transaction could

1 not be impeached if no confidential relation
2 had existed."

3 Mr. Pomeroy, in speaking of this rule, says:

4 "It is settled by an overwhelming weight of
5 authority that the principle extends to every
6 possible case in which a fiduciary relation
7 exists as a fact, in which there is confidence
8 reposed on one side, and the resulting superior-
9 ity and influence on the other." 2 Pomeroy,
10 Equity Jurisp. (3d. ed), §956.

11 In using the above language, Mr. Pomeroy is
12 speaking of equitable interference, but the
13 reason of the law and the law itself is the
14 same, as applied to actions of this character,
15 ehether the right sought to be enforced springs
16 from statutory or equitable authority.

17 IV Scott, Trusts 3129 §468 (1956) says:

18 There are numerous cases in which it has been
19 held that where the title to land or chattels
20 or money is obtained by undue influence exerted
21 by the transferee upon the transferor, a con-
22 structive trust arises. Thus where a person who
23 is in a fiduciary or confidential relation to
24 another obtains property from the other by taking
25 advantage of the relation, a constructive trust
26 arises.⁶

27 In Bangasser & Assoc. v. Hedges, 58 Wn.2d 514, 364 P.2d
28 237 (1961), the court says (p. 516):

29 [1] The constructive trust is equity's antidote
30 for the pain wrought by freedom of contract be-
31 tween persons of unequal ability. Cardozo de-
32 scribed it as "the formula through which the
33 conscience of equity finds expression" (Beatty v.
34 Guggenheim Exploration Co., 225 N.Y. 380, 386,
35 122 N. E. 378), and as "the remedial device through
36 which preference of self is made subordinate to
37 loyalty to others." Meinhard v. Salmon, 249 N.Y.
38 458, 164 N. E. 545, 62 A.L.R. 1.

39 The rule stated in 2 Pomeroy's Equity Juris-
40 prudence, §1053, was adopted in Rozell v. Vansyckle,
41 11 Wash. 79, 83, 39 Pac. 270:

42 "In general, whenever the legal title to property,
43 real or personal, has been obtained through actual
44 fraud, misrepresentations, concealments, or through
45 undue influence, duress, taking advantage of one's

1 weakness or necessities, or through any other
2 similar means or under any other similar circum-
3 stances which render it unconscientious for the
4 holder of the legal title to retain and enjoy
5 the beneficial interest, equity impresses a
6 constructive trust on the property thus acquired
7 in favor of the one who is truly and equitably
8 entitled to the same;. . .and a court of equity
9 has jurisdiction to reach the property either in
10 the hands of the original wrong-doer, or in the
11 hands of any subsequent holder, until a purchaser
12 of it in good faith and without notice acquires
13 a higher right, and takes the property relieved
14 from the trust.'"

15 Accord: Kausky v. Kosten, 27 Wn.(2d) 721, 179
16 P.(2d) 950; Nicolai v. Desilets, 185 Wash. 435,
17 55 P. (2d) 604; Seventh Elect Church in Israel
18 v. First Seattle Dexter Horton National Bank,
19 162 Wash. 437, 299 Pac. 359; Pacheco v. Mello,
20 139 Wash. 566, 247 Pac 927.

21 [2] There was a constructive trust.

22 III. CONCLUSION

23 We recognize that the issues confronting the court and
24 the parties do not arise in the common framework of facts
25 surrounding an application for appointment of guardian. The
26 disbursement of a large sum of money paid for the express pur-
27 pose of caring and treating a quadraplegic for life carries a
28 concomitant obligation to see to it that the funds are devoted
29 to the purposes intended. The law is not so adolescent in its
30 development that it lacks the mechanisms to accomplish the re-
31 sults sought by the petitioner. The court should carefully con-
32 sider the alternatives of guardianship or constructive trust
33 against potential mischief of undue influence in the disposition
34 of one's estate by gift.

35 Respectfully submitted,

36 SCHWEPPE, DOOLITTLE, KRUG,
37 TAUSEND, BEEZER & BEIERLE

38 By

39 
Robert R. Beezer

40 October 15, 1975

41 Pet. Memo. of Authority
in Support of Petition
for Letters - page 8.

FILED

KING COUNTY, WASHINGTON

OCT 16 1975

BETTY J. MULLEN
SUPERIOR COURT CLERK
BY LORETTA M. PYNE
DEPUTY

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28
29
30
31
32

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

In the Matter of the Guardianship)
of)
MAUREEN I'ANSON,)
an Incompetent.)

No. G-4419

MEMORANDUM BRIEF
SUBMITTED BY
MAUREEN I'ANSON

THE ABOVE proceeding involves a Petition by Thomas I'Anson to have a Guardian appointed of the Estate of Maureen I'Anson, his daughter, on the ground that she "is an incompetent person who is incapable of managing her property by reason of mental illness or by reason of other mental incapacity," referring to paragraph 3. on page 1 of the "Petition for Guardian of Estate." It is further pointed out in the Petition that Maureen received a total of \$1,070,000.00 as a settlement in a personal injury action brought against the State of Alaska in which she was represented by attorney Russell Newman and, inasmuch as Maureen at the time the civil action in Alaska was commenced, ^{was 2 minor} Maureen's father, Thomas I'Anson, the petitioner herein, was also a party inasmuch as he was seeking to recover hospital and medical expenses incurred in treating Maureen as a result of the auto accident in question. Out of the net amount, remaining after payment of attorneys fees and some of the expenses incurred, a total of \$696,195.54 was placed in the Pacific National Bank of Washington in the form of a monthly certificate of deposit, with no funds to be withdrawn, pursuant to the agreement between Maureen I'Anson and her father, through their respective attorneys, without the written approval

18

1
2 of both parties. At present there remains in this account a total
3 of \$602,660.78, and petitioner, Thomas I'Anson claims that he is
4 entitled to a portion of these funds for various expenses incurred
5 by him in connection with the litigation in Alaska. The parties
6 have not been able to amicably resolve the amount due Thomas
7 I'Anson out of these settlement proceeds, so that is one of the
8 issues involved in this current proceeding.

9 The principal issue in the current proceeding is the
10 determination of the question of whether or not Maureen is
11 "incompetent" within the meaning of the Washington statutes grant-
12 ing the Court authority to appoint a guardian for the person of
13 an estate, being RCW 11.88.010. In support of his petition with
14 regard to this issue, Mr. I'Anson alleges that "Maureen I'Anson
15 has consulted with spiritual advisors and others and believes that
16 her medical condition will improve to the point where she will no
17 longer be totally and permanently disabled. In accordance with
18 ~~these views and the~~ religious convictions of Maureen I'Anson, she
19 believes that the settlement proceeds, or at least \$540,000.00 of
20 such proceeds, should be contributed to Community Chapel and Bible
21 Training Center, a Washington non-profit corporation, located at
22 13635 - 8th Avenue South, Seattle, Washington," all as set forth
23 in paragraph 11 of petitioner's petition. Relative to such
24 allegations, we point out to the Court that when Mr. Beezer, as
25 counsel for Thomas I'Anson, took the deposition of Maureen I'Anson,
26 Maureen testified that she has not made any decision as to what
27 she proposes to do with any of the settlement funds available to
28 her and that she is seeking counsel in this regard, and although
29 she will give considerable weight to any religious or spiritual
30 counsel of the President of Community Chapel and Bible Training
31
32

1
2 Center, if she solicits any such counsel, she will use her own
3 judgment in any decision and be obedient to God's will in this
4 matter to such extent as she understands His will. We are further
5 confident that the testimony will be undisputed that Maureen, in
6 any event, will retain at least \$150,000.00 out of the settlement
7 proceeds, as a minimum, for her own personal needs, over and above
8 such expenditures that have already been made.

9 The statutory authority, pursuant to which the petitioner
10 appears is set forth in RCW 11.88.010. This statute provides that
11 the Court has authority to appoint guardians for the persons and
12 estates or either thereof, of incompetent persons, and the statute
13 defines an "incompetent" person as follows:

14 "Incapable by reason of insanity, mental illness,
15 imbecility, idiocy, senility, habitual drunken-
16 ness, excessive use of drugs, or other mental
incapacity, of either managing his property or
caring for himself or both."

17 The testimony which will be presented on behalf of Maureen
18 I'Anson will reveal unmistakably clearly, we believe, that Maureen
19 is not "incompetent" within the foregoing definition. On the
20 contrary, it is submitted that the testimony which will be presen-
21 ted will disclose that indeed Maureen is unimpaired with regard
22 to her mental processes and that she is giving intelligent and
23 entirely rational consideration as to her proposed disposition of
24 the funds in question. The fact that Maureen's father may have a
25 completely different outlook on life, or a completely different
26 philosophy, or a completely different spiritual status than
27 Maureen should in no way be determinative of the competency or
28 incompetency of his own daughter. The testimony will disclose
29 that Maureen is a Christian, who accepts the Bible as the inspired
30 word of God, and she has committed her life to the spiritual
31
32

1
2 principles set forth in the "Holy Scriptures." To this end,
3 therefore, and to such extent as Maureen chooses to make any
4 charitable contribution to a church or bible training center which
5 likewise teaches and practices the same Christian principles based
6 on the same scriptures the Court should be hard pressed indeed to
7 determine ipso facto that Maureen is incompetent, within the
8 definition of the Washington statutes. Were the Court to take
9 such an approach, it is respectfully submitted that the Court would
10 have to conclude that many of those who, through the ages, have
11 made the greatest spiritual impact on the nations, have been
12 mentally "incompetent."

13
14 LAW

15 The attention of the Court is invited to the following
16 Washington cases:

- 17 1. In re Michelson (1941) 8 Wn 2d 327, 111 P.2d 1011.

18 In this case five of the ten children of a 79 year old widow, Mrs.
19 Michelson, petitioned the Court to appoint a guardian for the
20 estate of their mother. About one year later, five of the children
21 filed objections to a petition by Mrs. Michelson to revoke the
22 former order appointing the guardians for her estate. This case
23 involves an appeal from the order of the trial court in refusing
24 to revoke its former order appointing guardians for the estate of
25 Mrs. Michelson whom the court had found to be an incompetent
26 person. The Supreme Court pointed out that under the then exist-
27 ing statutes, being Remington Revised Statutes §1565, no defini-
28 tion was set forth for an insane or incompetent person. The Court
29 stated,

30 "Under a statute of that character, the unsoundness
31 of mind which would justify the appointment of a
32 guardian must be more than a mere debility or im-
pairment of memory. It must be such as to deprive

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28
29
30
31
32

the person affected of ability to manage his estate. If the person for whom a guardian is sought is capable of transacting the ordinary business involved in taking care of his property, and if he understands the nature of his business and the effect of what he does, and can exercise his will with reference to such business, notwithstanding the influence of others, he is not of unsound mind, and a guardian should not be appointed for his property." (page 335).

The Supreme Court, in overruling the trial court and in thereby determining that Mrs. Michelson was not incompetent, further stated,

"In the case now before us, the evidence shows, and the trial court expressed the view, that Mrs. Michelson had sufficient will power to manage her own affairs when dealing with strangers or others than her own children. So far as we are informed, there are no authorities holding that, when one group of children are of the view that a parent will not deal fairly with them in his disposition of his property, in the absence of overreaching or fraud, that furnishes any basis for the appointment of a guardian; and there is no evidence in this case which would justify a finding of overreaching or fraud. Apprehension in that regard is not to be indulged in." (page 336)

2. In re Nelson (1942) 12 Wn 2d 382, 121 P.2d 968. In this case the Supreme Court reversed an order of the trial court which denied the termination of a guardianship of Mrs. Ethel Nelson, a widow. The opinion is lengthy and recites the evidence in considerable detail. The evidence does establish beyond controversy that Mrs. Nelson had been suffering from diabetes for over 15 years and needed to take insulin to control the disease. There was conflicting testimony by medical specialists concerning her ability or inability to manage her own business affairs. In reversing the trial court, however, and in thereby holding that Mrs. Nelson's petition for discharge of the guardian of her estate should be granted, the Supreme Court stated as follows:

1
2 "We are convinced that the evidence preponder-
3 ates against the conclusion of the trial court,
4 that appellant is mentally incompetent to manage
5 her own business affairs. It appears beyond
6 question that appellant's mind still functions
7 to a great extent normally. She is perfectly
8 capable of knowing what she enjoys to do and
9 what she wants, and of deciding what she desires
10 to do and what she desires not to do. It is, of
11 course, significant that, sick and suffering as
12 she is, neither respondent nor anyone else has
13 suggested that any necessity exists for the ap-
14 pointment of a guardian for appellant's person.
15 Of course, she is physically weak, she is
16 nervous, and, when tired and thereby rendered
17 more nervous than usual, her mind does not react
18 as keenly or quickly as normally it does, or as
19 it did years ago. There is nothing surprising
20 in this condition, and all things considered, it
21 would seem that appellant is in better condition
22 mentally than would ordinarily be expected."
23 (page 397)

14 3. In re Heuschele (1949) 34 Wn. 2d 414, 208 P. 2d 1167.

15 We believe it is sufficient, for the purpose of analyzing the
16 reasoning and holding of the Supreme Court to simply quote the
17 entire headnote as follows:

18 "In proceedings for the appointment of a guardian
19 for the estate of a person eighty-seven years
20 old, held that the evidence sustains the finding
21 of the trial court that the person is unable to
22 carry on her ordinary business affairs and that
23 her son, who in the past has handled her business
24 affairs and in whom she has confidence, is a proper
25 person to be appointed guardian of her estate and
26 should be so appointed."

27 We interject, however, that the trial court repeatedly stated, as
28 set forth on pages 420 and 421 of the opinion, that the trial
29 court found that Mrs. Heuschele was not competent to exercise her
30 own independent judgment free from the influence of others and
31 that this was the basis for the trial court's conclusion that a
32 guardian should be appointed and, as stated above, the Supreme
Court upheld this conclusion of the trial judge.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28
29
30
31
32

4. ALR 3rd 774 Annotation on "mental condition which will justify the appointment of guardian, committee or conservator of the estate for an incompetent or spendthrift." This is a rather extensive annotation covering some 72 pages illustrative of various types of conditions which were held to warrant or not to warrant the appointing of a guardian of a person's estate. Particularly relevant to the matter at issue are paragraphs 4 and 6, dealing with eccentricity and improvident disposition of funds. The Court's attention is invited to the Maryland case referred to on page 794, wherein it was held that the evidence did not show that an aged woman was incompetent so as to require the appointment of a committee for her estate where it was charged

"she was afflicted with a mania on the subject of Christian missions, and the form of her insanity was described as religious paranoia."


Of similar import is the case of In Re Smith (1927) 26 Ohio NP NS 533, referred to on page 794 wherein it was held

"that one should not be declared mentally incompetent to handle his business and personal affairs merely because he holds religious beliefs different from those of the majority of the people."

CONCLUSION

It is submitted in conclusion that the evidence will demonstrate clearly and convincingly that Maureen I'Anson is entirely mentally rational and that she is entirely competent to manage her estate utilizing appropriate reasoning and rational judgment, which in no way is inconsistent with her religious convictions and beliefs.

Respectfully submitted,


CHARLES V. MOREN
Attorney for Maureen I'Anson

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

FILED
KING COUNTY, WASHINGTON
OCT 16 1975

In the Matter of the
Guardianship of

Maureen I'Anson.

BETTY J. MULLEN
SUPERIOR COURT CLERK
BY LORETTA M. PINE
DEPUTY

Q-4419

CHECK LIST FOR HEARING ON
GUARDIAN'S PETITION FOR
APPOINTMENT

Notice properly served NO (?) RCW 11.88.040

REMARKS, including action of court: ① personal service on
incompetent (appears) ② no sworn doctor's statement
③ 30 days have passed since petition filed.
④ no-one has care + custody ⑤ no other gdn.
⑥ no gdn ad litem app't

Initials of checker: KDK

Date of check: 15 Oct 75

19

15 OCT 21 PM 1:42

CLERK
KING COUNTY WA.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28
29
30
31

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

In the Matter of the Guardianship)	IN PROBATE
)	NO. G 4419
)	
)	JUDGMENT
)	
)	
)	
)	
)	
)	
)	

This matter came on duly and regularly for trial before the undersigned Judge on October 16, 1975. The petitioner, Thomas I'Anson appeared through his attorney Robert R. Beezer, of Schweppe, Doolittle, Krug, Tausend, Beezer & Beierle; Maureen I'Anson appeared in person and through her attorney Charles V. Moren of Blackburn, Moren & Robinson. The court received a stipulation of the parties ~~with respect to the~~ payment of costs for the care and litigation expenses of Thomas I'Anson incurred in obtaining damages for personal injuries to Maureen I'Anson. After the petitioner's opening statement, counsel for Maureen I'Anson moved to dismiss the proceedings on the ground that the petitioner's opening statement failed to state facts upon which relief could be granted. After considering the authorities submitted by counsel and finding that Maureen I'Anson does not suffer from any mental disorder, the court rendered an oral opinion granting the motion. Now, therefore, in conformity with the stipulations of the parties and the court's ruling upon the motion, it is hereby

* ORDERED, ADJUDGED and DECREED as follows:

Judgment - P. 1

1 1. The application for Letters Guardianship should be and
2 the same hereby is denied without prejudice to any future
3 applications.

4 2. That certain trust agreement executed by the parties
5 and Pacific National Bank of Washington (Trust Account No.
6 16-2664-007) should be and the same hereby is declared terminated
7 with the trust corpus and any accumulated income to be disposed
8 of clear and free of trust as follows:

9 (a) The trustee shall, on the next maturity date of
10 the time certificate of deposit held in trust, pay to Thomas
11 I'Anson the sum of \$22,558.90, said sum being computed by de-
12 ducting the sum of \$11,441.10 in the hands of Schweppe, Doo-
13 little, Krug, Tausend, Beezer & Beierle from the sum of
14 \$34,000.00. Upon payment of said sum from the trust and payment
15 of the sums from the trust account at Schweppe, Doolittle,
16 Krug, Tausend, Beezer & Beierle to Thomas I'Anson, Maureen
17 I'Anson shall be released from any and all further liability
18 to Thomas I'Anson for expenses incurred in caring for Maureen
19 I'Anson and litigation of her personal injury claims.

20 (b) The trustee shall, on the next maturity date
21 of the time certificate of deposit held in trust, pay all the
22 rest, residue and remainder of the trust principal and income
23 to Maureen I'Anson Pangburn and thereupon said trust shall
24 terminate.

25 3. Neither party shall recover costs in this matter.

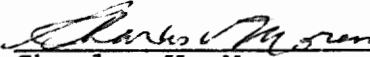
26 DONE IN OPEN COURT this 21st day of October, 1975.

27 Donald J. Horowitz
28 JUDGE
29
30
31

Judgment - P. 2

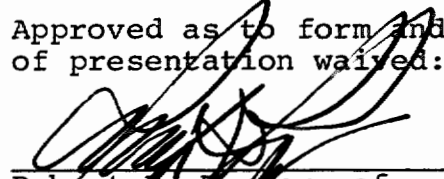
1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28
29
30
31

Presented by:



Charles V. Moren, of
Blackburn, Moren & Robinson
Attorneys for Maureen I'Anson

Approved as to form and entry; notice
of presentation waived:



Robert R. Beezer, of
Schwepps, Doolittle, Krug,
Tausend, Beezer & Beierle
Attorneys for Petitioner