

CASE#: 87-2-16506-0 CIVIL JUDGMENT# NO  
 TITLE: SNOEY VS COMMUNITY CHAPEL & BIBLE TRAINING CENTER ET ANO  
 FILED: 09-23-87  
 CAUSE: INJ INJUNCTION  
 DISPOSITION: STCL DATE: 06-19-89

ARCHIVED: 11-24-91

CONSOLIDATED:

NOTE1: \*CASE SET P2

NOTE2:

-----PARTIES-----

CONN	LAST NAME,	FIRST MI TITLE	LITIGANTS	DATE
PLA01	SNOEY,	WAYNE		
DEF01	COMMUNITY CHAPEL & BIBLE TRAINING CENTER			
DEF02	BARNETT,	DONALD L		

-----ATTORNEYS-----

CONN	LAST NAME,	FIRST MI TITLE	LITIGANTS	DATE
ATP01	LINN,	BRIAN J		
WTD01	BUGNI,	MICHAEL W		
WTD02	LEACH,	JAMES G		
ATD03	DONALDSON,	TIM		
ATD04	BUSTO,	MARK	1	

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

SUB#	DATE	CD/CONN	DESCRIPTION	SECONDARY	MICROFILM
-	09-23-87	FFRC	FILING FEE RECEIVED - CIVIL BRIAN J LINN	78.00	
1	09-23-87	SMCMP	SUMMONS & COMPLAINT		
2	10-02-87	AFSR	AFFIDAVIT OF SERVICE	23.00	
3	10-07-87	APR	APPEARANCE FOR COMMUNITY CHAPEL		
		ATD01	BUGNI, MICHAEL W		
4	10-03-87	APR	APPEARANCE COMMUNITY CHAPEL & BIBL TRAINING DONALD BARNETT		
		ATD02	LEACH, JAMES G		
5	11-03-87	AFML	AFFIDAVIT OF MAILING		
6	11-04-87	AFSR	AFFIDAVIT OF SERVICE		
7	11-13-87	AFSR	AFFIDAVIT OF SERVICE		
8	11-23-87	NTWSUB	NOTICE WITHDRAW & SUBSTITUT COUNSEL FOR COMMUNITY CHAPEL ET AL		
		ATD02	LEACH, JAMES G		
9	01-29-88	AN	ANSWER DEFS		
10	04-21-88	NTWSUB	NOTICE WITHDRAW & SUBSTITUT COUNSEL		
		ATD03	DONALDSON, TIM		
11	03-22-89	NTWSUB	NOTICE WITHDRAW & SUBSTITUT COUNSEL		
		ATD04	BUSTO- MARK		
12	03-30-89	NTTSA	NT FOR TRIAL & STMNT OF ARBITRABIL		
13	05-05-89	NTAA	NOTICE OF APPOINTMENT AS ARBITRATOR		
14	05-12-89	ARSRAC	ARB STTLMNT & REMOVAL FROM ARB CAL		
15	07-07-89	ORDSM	ORDER OF DISMISSAL VS ALL		

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

17 SEP 23 P 18

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

WAYNE SNOEY,

Plaintiff,

vs.

COMMUNITY CHAPEL AND BIBLE TRAINING CENTER: DONALD LEE BARNETT, in his capacity as Pastor of Community Chapel and Bible Training Center, and JANE DOE BARNETT, his wife, and the marital community composed of them,

Defendants.

NO.

SUMMONS

1008

A lawsuit has been started against you in the above-entitled court by Wayne Snoey, 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 twenty (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 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 fourteen (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.

SUMMONS - 1

ORIGINAL

LAW OFFICE OF BRIAN J. LINN 245 S.W. 152nd SEATTLE, WA 98166 (206) 242 9876

Handwritten mark resembling a vertical line with a hook at the top and a horizontal base.

034

FILED  
09-23-1987  
1:17 P.m.  
KING COUNTY SUPERIOR COURT  
M. JANICE MICHELS  
KING COUNTY CLERK  
SEATTLE, WA.

87-2-16506-0

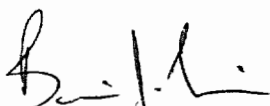
REG/RECEIPT #	TRAN-CODE	DOCKET-CODE
03-24152	1100	\$FFRC
PAID BY: LINN, BRIAN		
TRANSACTION AMOUNT:		\$78.00

1  
2 If you wish to seek the advice of an attorney in this  
3 matter, you should do so promptly so that your written response,  
4 if any, may be served on time.

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

7 DATED this 22<sup>nd</sup> day of September, 1987.

8 LAW OFFICE OF BRIAN J. LINN

9 by:   
10 Brian J. Linn  
11 Attorney for Plaintiff

87 SEP 23 P 1:18

SUPERIOR COURT  
SEATTLE, WA

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

WAYNE SNOEY,

Plaintiff,

vs.

COMMUNITY CHAPEL AND BIBLE  
TRAINING CENTER; DONALD LEE  
BARNETT, in his capacity as  
Pastor of Community Chapel and  
Bible Training Center, and  
JANE DOE BARNETT, his wife,  
and the marital community  
composed of them,

Defendants.

No.

15506

COMPLAINT FOR MONEY DAMAGES  
AND INJUNCTIVE RELIEF

COMES NOW, Wayne Snoey, by and through his attorneys, the  
Law Office of Brian J. Linn, and alleges as follows:

PLAINTIFF

I.

Plaintiff, Wayne Snoey, is, and at all times material  
hereto, has been a resident of King County, Washington.

DEFENDANTS

II.

Defendant, Community Chapel and Bible Training Center is a  
non-profit organization organized under the laws of the State of

COMPLAINT FOR MONEY DAMAGES  
AND INJUNCTIVE RELIEF - 1

ORIGINAL

LAW OFFICE OF  
BRIAN J. LINN  
245 S.W. 152nd  
SEATTLE, WA 98166  
(206) 242 9876

1 Washington and located and operating business in Seattle,  
2 Washington.

3 III.

4 Defendant, Donald Lee Barnett is the Pastor of Community  
5 Chapel and Bible Training Center, and all acts, practices and  
6 omissions of said Defendant were committed as part of his duties  
7 as Pastor of Community Chapel and Bible Training Center. All  
8 acts, practices and omissions alleged herein on the part of the  
9 Defendant, Donald Lee Barnett, were done for and on behalf of the  
10 marital community composed of himself and his spouse, Jane Doe  
11 Barnett.

12 IV.

13 The acts, practices and omissions of the Defendants  
14 complained of herein, took place in King County, Washington.

15 FACTUAL ALLEGATIONS

16 V.

17 Plaintiff, Wayne Snoey, is married to Renna Snoey and has  
18 one minor child, Jana, age 8.

19 VI.

20 Plaintiff, Wayne Snoey, began employment with the Community  
21 Church and Bible Training Center in November, 1973. He has been  
22 employed as Operations Manager for the last ten years. The  
23 Community Church and Bible Training Center is a large religious  
24

25 COMPLAINT FOR MONEY DAMAGES  
26 AND INJUNCTIVE RELIEF - 2

1 organization with a church membership of approximately 2,500 and  
2 Bible College enrollment of approximately 550. The Community  
3 Church and Bible Training Center has a budget of nearly  
4 \$4,000,000.00, and employs approximately 210 employees on a 45  
5 acre campus.

6 VII.

7 Plaintiff, Wayne Snoey's responsibilities covered a wide  
8 range of areas, including office services, campus security,  
9 janitorial services, facilities use, maintenance, landscaping and  
10 construction. His other duties included acting as Corporation  
11 Budget Manager, Bookstore Manager, Assistant to the corporation's  
12 general manager, Marketing and Media coordinator and the manager  
13 of 40 paid staff members and 140 volunteer staff members.  
14 Plaintiff Wayne Snoey performed his duties adequately at all  
15 times.

16 VIII.

17 On June 8, 1987, Plaintiff, Wayne Snoey filed a petition for  
18 dissolution of his marriage. His marriage dissolution is  
19 currently pending in King County Superior Court. Plaintiff Wayne  
20 Snoey was aware that church policy prevented him from retaining  
21 his employment once his divorce became finalized. Based on this  
22 policy, he was promised on numerous occasions by Defendant,  
23 Donald Lee Barnett, that he would be permitted to remain in  
24

25 COMPLAINT FOR MONEY DAMAGES  
26 AND INJUNCTIVE RELIEF - 3

1 employment up to and until his marriage dissolution became  
2 finalized. Defendants knew or should have known that Plaintiff  
3 Wayne Snoey, in reliance upon Defendants policies and statements  
4 would file for divorce.

5 IX.

6 In justifiable reliance upon Defendants statements, and  
7 policies, Wayne Snoey pursued his divorce action and expended  
8 substantial attorney's fees to have the Court determine temporary  
9 support and maintenance issues. A temporary order requiring  
10 Plaintiff Wayne Snoey to provide child support and maintenance  
11 was issued on July 9, 1987.

12 X.

13 The following day, July 10, 1987, Defendant Donald Lee  
14 Barnett terminated Plaintiff Wayne Snoey from his employment.  
15 Plaintiff Wayne Snoey's salary at date of termination was  
16 \$42,250.00.

17 XI.

18 Because Defendants created an atmosphere of job security  
19 pending finalization of the divorce, Wayne Snoey did not  
20 aggressively seek other employment prior to his termination.  
21 Plaintiff would not have gone to Court and incurred substantial  
22 attorney's fees had he known he would be fired the next day.  
23 Defendants' promises of specific treatment for Wayne Snoey in his  
24

25 COMPLAINT FOR MONEY DAMAGES  
26 AND INJUNCTIVE RELIEF - 4



1 specific circumstance, i.e., that his job would continue until  
2 his divorce became final, constituted enforceable components of  
3 the employment relationship.

4 XII.

5 Plaintiff Wayne Snoey's termination has devastated his  
6 financial status, as well as that of his wife, Renna and his  
7 daughter, Jana. Defendant Donald Lee Barnett was aware of the  
8 consequences his decision to terminate Wayne Snoey would have on  
9 Wayne Snoey's financial status.

10 XIII.

11 Because of Plaintiff's termination and the attendant change  
12 in his financial situation, he has incurred additional attorney's  
13 fees in conjunction with his marriage dissolution action.

14 XIV.

15 As a result of all of the allegations alleged herein before,  
16 Plaintiff Wayne Snoey has suffered financial loss and emotional  
17 distress. In an effort to mitigate his damages, Wayne Snoey was  
18 forced to borrow money for job-placement services and for living  
19 expenses. Nevertheless, Plaintiff Wayne Snoey remains unemployed  
20 and without income.

21 CAUSES OF ACTION

22 Based upon all of the allegations herein before alleged, the  
23 Plaintiff, Wayne Snoey asserts the following causes of action:

24  
25 COMPLAINT FOR MONEY DAMAGES  
26 AND INJUNCTIVE RELIEF - 5

1 XV.

2 Defendants are liable to Plaintiff for breach of contract  
3 and promissory estoppel.

4 XVI.

5 The Defendant are liable to the Plaintiff in tort for  
6 Plaintiff's unlawful discharge from employment, as established in  
7 Thompson v. St. Regis Paper Company, 102 W 2d 219, 685 P.2d 1081  
8 (1984).

9 XVII.

10 Defendant Donald Lee Barnett has intentionally inflicted  
11 emotional distress and harm upon the Plaintiff.

12 DAMAGES

13 XVIII.

14 Due to the Defendants' unlawful acts, practices and  
15 omissions herein, the Plaintiff Wayne Snoey has lost his job and  
16 income; has suffered embarrassment, humiliation, emotional and  
17 mental distress; and other damages in amounts to be proven at the  
18 time of trial.

19 PRAYER FOR RELIEF

20 WHEREFORE, Plaintiff Wayne Snoey prays for judgment against  
21 the Defendants as follows:

22 1. For damages for back pay lost from the time Plaintiff  
23 was terminated until such time that Plaintiff is either  
24 reinstated or his divorce becomes final, whichever occurs first;

25 COMPLAINT FOR MONEY DAMAGES  
26 AND INJUNCTIVE RELIEF - 6

1           2. For damages for Plaintiff's mental distress and  
2 emotional suffering, in amounts to be proven at trial;

3           3. For the Plaintiff's reasonable attorney's fees, court  
4 costs, disbursements, and other costs of litigation, including  
5 pre-trial discovery;

6           4. For an order requiring the Defendants to reinstate  
7 Plaintiff to his previous position until such time as his divorce  
8 becomes final; and

9           5. For such other and further relief as the Court may deem  
10 just and appropriate.

11 DATED this 22nd day of September, 1987.

12  
13 LAW OFFICE OF BRIAN J. LINN

14 by: Brian J. Linn

Brian J. Linn  
Attorney for Plaintiff

15  
16 by: Rhonda J. Brown

Rhonda J. Brown  
Legal Intern

17  
18 STATE OF WASHINGTON )  
19 ) ss.  
20 COUNTY OF KING )

21 Wayne Snoey, being first duly sworn, upon oath, deposes and  
22 says:

23 That he is the Plaintiff herein, that he read the foregoing  
24 document, knows the contents thereof and believes the same to be  
25 true.

26 Wayne L. Snoey

27 COMPLAINT FOR MONEY DAMAGES  
28 AND INJUNCTIVE RELIEF - 7

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Signed and sworn to before me on September 22, 1987  
by Wayne Snoey.

Heather Blaine Kelly  
Notary Public in and for the State  
of Washington, residing at Seattle.  
My appointment expires: 2-9-89

COMPLAINT FOR MONEY DAMAGES  
AND INJUNCTIVE RELIEF - 8

WAYNE SNOEY,

AFFIDAVIT OF SERVICE OF

COMMUNITY CHAPEL AND BIBLE <sup>vs.</sup> KING CENTER, Plaintiff  
et al., Defendant  
Garnishee Defendant

SUMMONS AND COMPLAINT FOR MONEY DAMAGES AND INJUNCTIVE RELIEF

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 9/30/87 at 2:45p M., at 18635 8th Ave. So., Seattle

King County, Washington, affiant duly served the above-described documents in the above-entitled matter upon COMMUNITY CHAPEL AND BIBLE TRAINING CENTER

by then and there personally delivering a true and correct copy thereof to and leaving same with JACK A. HICKS, AS DIRECTED

RESIDENCE SERVICE

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(s), personally delivering \_\_\_\_\_ true and correct copy(ies) thereof to 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.

\_\_\_\_\_ TRIPS @ \_\_\_\_\_ MILES

Subscribed and Sworn to before me 10/2/87

R. DAVIS sk

SERVICE ATTEMPTED AT:

Joseph L. Long  
NOTARY PUBLIC in and for the State SEATTLE of Washington, residing at \_\_\_\_\_

Service Fees 6.00 Travel 12.00 Return Fee 5.00 Cert. Mail \_\_\_\_\_ Total \$ 23.00

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

5 WAYNE SNOEY, )

6 Plaintiff, )

7 vs. )

8 COMMUNITY CHAPEL AND BIBLE )  
9 TRAINING CENTER: DONALD LEE )  
10 BARNETT, in his capacity as )  
11 Pastor of Community Chapel and )  
12 Bible Training Center, and )  
13 JANE DOE BARNETT, his wife, )  
14 and the marital community )  
15 composed of them, )

16 Defendants. )

NO. 97-2-16506-0  
SUMMONS

17 A lawsuit has been started against you in the above-entitled  
18 court by Wayne Snoey, Plaintiff. Plaintiff's claim is stated in  
19 the written Complaint, a copy of which is served upon you with  
20 this Summons.

21 In order to defend against this lawsuit, you must respond to  
22 the Complaint by stating your defense in writing, and serve a  
23 copy upon the undersigned attorney for the Plaintiff within  
24 twenty (20) days after the service of this Summons, excluding the  
25 day of service, or a default judgment may be entered against you  
26 without notice. A default judgment is one where Plaintiff is  
27 entitled to what he asks for because you have not responded. If  
28 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 fourteen (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.

SUMMONS - 1

COPY

LAW OFFICE OF  
BRIAN J LINN  
245 SW 152nd  
SEATTLE, WA 98166  
(206) 242 9876

10-7-87  
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IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON  
IN AND FOR KING COUNTY

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WAYNE SNOEY,	)	
	)	
Plaintiff,	)	No. 87-2-16506-0
	)	
vs.	)	NOTICE OF APPEARANCE
	)	
COMMUNITY CHAPEL and BIBLE	)	
TRAINING CENTER; DONALD LEE	)	
BARNETT, in his capacity as	)	
Pastor of Community Chapel	)	
and Bible Training Center,	)	
and JANE DOE BARNETT, his	)	
wife, and the marital	)	
community composed of them.	)	
	)	
Defendants.	)	

TO: WAYNE SNOEY, Petitioner, and

TO: BRIAN J. LINN, Attorney for Petitioner

YOU WILL PLEASE TAKE NOTICE that Community Chapel and Bible Training Center; Donald Lee Barnett and Jane Doe Barnett, Defendants, hereby appear in the above-entitled cause by the undersigned attorneys and request that all further papers and pleadings herein, except original process, be served upon the undersigned attorneys at the address below stated.

DATED: October 5, 1987

  
 MICHAEL W. BUGNI  
 Attorney for Defendants

NOTICE OF APPEARANCE

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ALVIN D. MAYHEW, JR.

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IN THE SUPERIOR COURT OF WASHINGTON FOR KING COUNTY  
 WAYNE SNOEY, Plaintiff, )  
 vs. ) NO. 87-2-16506-0  
 COMMUNITY CHAPEL AND BIBLE )  
 TRAINING CENTER: DONALD LEE ) NOTICE OF  
 BARNETT, in his capacity as Pastor ) APPEARANCE  
 of Community Chapel and Bible )  
 Training Center, and JANE DOE )  
 BARNETT, his wife, and the )  
 marital community composed of )  
 them. Defendants. )

TO: Brian J. Linn  
 AND TO: Clerk of the Court

YOU AND EACH OF YOU WILL PLEASE TAKE NOTICE that COMMUNITY CHAPEL AND BIBLE TRAINING: DONALD LEE BARNETT, hereby appear in the above-entitled cause by the undersigned attorneys and requests that all further papers and pleadings herein, except original process, be served upon the undersigned at the address below stated.

DATED this 30th day of October, 1987.

LEACH, BROWN AND ANDERSEN

By James G. Leach  
 JAMES G. LEACH  
 Attorney for Defendant

NOTICE OF APPEARANCE - 1

LEACH, BROWN & ANDERSEN  
 ATTORNEYS AT LAW  
 4040 FIRST INTERSTATE CENTER  
 999 THIRD AVENUE  
 SEATTLE, WASHINGTON 98104  
 (206) 583-2714

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1987 OCT 23

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

WAYNE SNOEY, )  
)  
)  
Plaintiff, )  
vs. )  
)  
COMMUNITY CHAPEL and BIBLE )  
TRAINING CENTER; DONALD LEE )  
BARNETT, in his capacity as )  
Pastor of Community Chapel )  
and Bible Training Center, )  
and JANE DOE BARNETT, his )  
wife, and the marital )  
community composed of them, )  
)  
Defendants. )

NO. 87-2-16506-0  
AFFIDAVIT OF MAILING

THE UNDERSIGNED, being first duly sworn on oath, deposes and says: That I am a citizen of the United States, over the age of 18 years, not a party to or interested in the within matter, and competent to be a witness herein.

That on the 29th day of October, 1987, I deposited in the mails of the United States an envelope addressed and possessing postage first class prepaid by certified mail, return receipt requested, which envelope was directed to:

Mr. Carl A. Peterson  
4203 S. 172nd  
Seattle, Washington 98188

and which envelope contained a copy of Answer to Civil Complaint

ORIGINAL

MOREN, LAGSCHILD & CORNELL P.S.  
ATTORNEYS AT LAW  
ROOSEVELT-PINEHURST BUILDING  
11320 ROOSEVELT WAY N E  
SEATTLE WASHINGTON 98125  
206/365 3300

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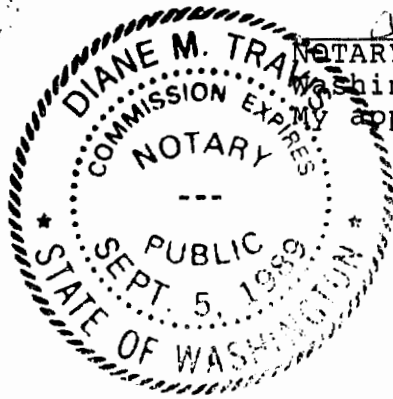
for Personal Injury and Damages in the above-captioned case.

Brenda W. Lindsey

BRENDA LINDSEY

Signed and sworn to before me on November 3, 1987, by Brenda Lindsey.

Siou M. Morris



NOTARY PUBLIC in and for the State of Washington, residing at Seattle my appointment expires 9/5/89.

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MURKIN,  
CASSIDY & SORNELL, P.S.

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

WAYNE SNOEY, )  
)  
Plaintiff, )  
)  
COMMUNITY CHAPEL AND BIBLE TRAINING )  
CENTER; DONALD LEE BARNETT, in his )  
capacity as Pastor of Community )  
Chapel and Bible Training Center, )  
and JANE DOE BARNETT, his wife, and )  
the marigal community composed of )  
them, )  
Defendants. )

NO. 87-2-16506-0

AFFIDAVIT OF SERVICE OF  
SUMMONS AND COMPLAINT FOR  
MONEY DAMAGES AND INJUNCTIVE  
RELIEF

STATE OF WASHINGTON ) ss.  
COUNTY OF KING )

Helen Diane Kelly being first  
duly sworn, upon oath, deposes and says:

Your affiant is now and at all times herein mentioned a citizen of the United States, a resident of the State of Washington, over the age of eighteen years, not a party to or interested in the above-entitled proceeding and competent to be a witness herein.

Your affiant further states that on the 3rd day of November, 1985, at Manhattan Village parking lot, 17833 1st Avenue South, King County, Seattle, Washington, your affiant duly served a true and correct copy of the Summons and Complaint for Money Damages and Injunctive Relief by then and there personally serving the same to

Jane Doe Barnett, a/k/a Barbara Barnett

Helen Diane Kelly

SWORN AND SUBSCRIBED TO before me this 3rd day of November, 1987.

L. Sharon Mathis  
Notary Public in and for the State  
of Washington, residing at Seattle.

My appointment expires: 6-26-91

AFFIDAVIT OF SERVICE OF  
SUMMONS AND COMPLAINT FOR  
MONEY DAMAGES AND INJUNCTIVE  
RELIEF

BRIAN J. LINN  
ATTORNEY AT LAW  
245 S.W. 152nd  
SEATTLE, WA 98166  
(206) 242-9876

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NOV 13 1987

MOREN,  
LAGESCHULTE & CORNELL, P.S.

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

WAYNE SNOEY, )  
 )  
Plaintiff, )  
 )  
COMMUNITY CHAPEL AND BIBLE TRAINING )  
CENTER; DONALD LEE BARNETT, in his )  
capacity as Pastor of Community )  
Chapel and Bible Training Center, )  
and JANE DOE BARNETT, his wife, and )  
the marital community composed of )  
them, )  
Defendants. )

NO. 87-2-16506-0

AFFIDAVIT OF SERVICE OF  
SUMMONS AND COMPLAINT FOR  
MONEY DAMAGES AND INJUNCTIVE  
RELIEF

STATE OF WASHINGTON ) ss.  
COUNTY OF KING )

Kathleen Sabourin

being first

duly sworn, upon oath, deposes and says:

Your affiant is now and at all times herein mentioned a citizen of the United States, a resident of the State of Washington, over the age of eighteen years, not a party to or interested in the above-entitled proceeding and competent to be a witness herein.

Your affiant further states that on the 5th day of November, 1987, at 416 S.W. 192nd

King County, Seattle, Washington,

your affiant duly served a true and correct copy of the Summons and Complaint for Money Damages and Injunctive Relief

by then and there personally serving the same to Donald Lee Barnett

Donald Lee Barnett

*Kathleen Sabourin*

SWORN AND SUBSCRIBED TO before me this 10th day of November,

19 87.

*Heidi Anne Kelly*  
Notary Public in and for the State of Washington, residing at Seattle.

AFFIDAVIT OF SERVICE OF  
SUMMONS AND COMPLAINT FOR  
MONEY DAMAGES AND INJUNCTIVE  
RELIEF

My appointment expires: 2-3/89

BRIAN J. LINN  
ATTORNEY AT LAW  
245 S.W. 152nd  
SEATTLE, WA 98166  
(206) 242-9876

87 NOV 23 P4 29

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

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WAYNE SNOEY, )  
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 ) Plaintiffs, )  
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 vs. )  
 )  
 ) COMMUNITY CHAPEL AND BIBLE )  
 ) TRAINING CENTER; DONALD LEE )  
 ) BARNETT, in his capacity as )  
 ) as Pastor of Community Chapel )  
 ) and Training Center, and JANE )  
 ) DOE BARNETT, his wife, and the )  
 ) marital community composed of )  
 ) them, )  
 )  
 ) Defendants. )

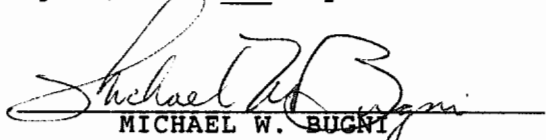
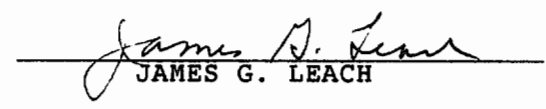
No. 87-2-16506-0  
NOTICE OF WITHDRAWAL AND  
CONSENT TO SUBSTITUTION

RECEIVED  
NOV 23 1987  
ALVIN D. MAYHEW, JR.

TO: THE CLERK OF THE COURT, and  
TO: WAYNE SNOEY, Plaintiff  
TO: BRIAN J. LINN, Attorney for Plaintiff

PLEASE TAKE NOTICE that MICHAEL W. BUGNI, hereby with-  
draws as Attorney of Record for the above-named Defendants, and  
consents to the substitution of JAMES G. LEACH of Leach, Brown &  
Andersen, 4040 First Interstate Center, 999 Third Ave., Seattle,  
WA 98104, as attorney for Community Chapel & Bible Training  
Center; Donald Lee Barnett and Jane Doe Barnett, husband and  
wife, and all future pleadings in this matter should be directed  
to him at said address.

DATED at Seattle, Washington, this 20<sup>th</sup> day of November,  
1987.

  
MICHAEL W. BUGNI  
  
JAMES G. LEACH

NOTICE OF WITHDRAWAL

MOREN, LAGESCHULTZ & CORNELL, P.S.  
ATTORNEYS AT LAW  
ROOSEVELT-PINEMURST BUILDING  
11320 ROOSEVELT WAY N E  
SEATTLE, WASHINGTON 98125  
(206) 365-9500

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

WAYNE SNOEY, )  
 ) NO. 87-2-16506-0  
Plaintiff, )  
vs. ) ANSWER  
 )  
COMMUNITY CHAPEL AND BIBLE )  
TRAINING CENTER; et al, )  
 )  
Defendants. )

COME NOW Community Chapel and Bible Training Center, and Donald Lee Barnett, in his capacity as Pastor of Community Chapel and Bible Training Center, and by way of Answer to the Plaintiff's Complaint filed herein, admits, denies and alleges as follows:

- I. Admits Paragraphs I, II, III, IV, X.
- II. Denies Paragraphs VIII, IX, XI, XII, XIII, XIV, XV, XVI, XVII, XVIII.
- III. By way of response to Paragraph V, admits that the allegation was true at the time the complaint was filed.
- IV. In response to Paragraph VI, admits that Plaintiff had been employed by defendant Community Chapel and Bible Training Center in various capacities since 1973, and that the campus has approximately 45 acres, and denies the balance.
- V. By way of response to Paragraph VII, denies the last sentence and admits the balance.

Wherefore having fully answered the complaint filed herein, Defendants prays that the court dismiss the plaintiff's complaint and award to the defendants their costs of litigations, statutory

ANSWER - 1

LEACH BROWN & ANDERSEN  
ATTORNEYS AT LAW  
4040 FIRST INTERSTATE CENTER  
999 THIRD AVENUE  
SEATTLE, WASHINGTON 98104  
(206) 583-2714

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attorney's fees and such other and further relief that the court  
may deem just and equitable.

DATED this 27<sup>th</sup> day of January, 1988.

James G. Leach  
JAMES G. LEACH  
Attorney for Defendants

ANSWER - 2

COPY RECEIVED

APR 21 1988

Leach, Brown & Andersen

COPY RECEIVED

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APR 20 1988

FINCH & LEVANDOWSKI

SUPERIOR COURT OF WASHINGTON FOR KING COUNTY

WAYNE SNOEY,

Plaintiff,

v.

COMMUNITY CHAPEL and BIBLE TRAINING CENTER; DONALD LEE BARNETT, in his capacity as Pastor of Community Chapel and Bible Training Center, and JANE DOE BARNETT, his wife, and the marital community composed of them,

Defendants.

No. 87-2-16506-0

NOTICE OF WITHDRAWAL AND SUBSTITUTION OF COUNSEL

TO: WAYNE SNOEY, plaintiff; and BRIAN J. LINN, your attorney:

YOU WILL PLEASE TAKE NOTICE that JAMES G. LEACH, of LEACH BROWN & ANDERSEN, hereby withdraws as attorney of record for Donald Lee Barnett and Jane Doe Barnett, properly identified hereafter as Barbara Barnett, and that EVANS CRAVEN & LACKIE, P.S., are hereby substituted as attorneys of record for said defendant.

DATED this 18th day of April, 1988.

EVANS CRAVEN & LACKIE, P.S.

By Tim Donaldson TIM DONALDSON Attorneys for Defendants Barnett

NOTICE OF WITHDRAWAL/ SUBSTITUTION OF COUNSEL : 1 15004924.NOW

Evans, Craven & Lackie, P.S. LAWYERS

34th FLOOR COLUMBIA CENTER, 701 - 5th AVENUE SEATTLE WASHINGTON 98104

(206) 386-5555



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LEACH BROWN & ANDERSEN

By James G. Leach  
JAMES G. LEACH

NOTICE OF WITHDRAWAL/  
SUBSTITUTION OF COUNSEL : 2  
15004924.NOW

*Evans, Craven & Lackie, P.S.*

LAWYERS

34th FLOOR COLUMBIA CENTER, 701 - 5th AVENUE  
SEATTLE WASHINGTON 98104

(206) 386-5555

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SUPERIOR COURT FOR THE STATE OF WASHINGTON  
COUNTY OF KING

WAYNE SNOEY,  
  
Plaintiff,  
  
v.  
  
COMMUNITY CHAPEL AND BIBLE  
TRAINING CENTER; DONALD LEE  
BARNETT, in his capacity as  
Pastor of Community Chapel and  
Bible Training Center, and  
JANE DOE BARNETT, his wife, and  
the marital community composed  
of them,  
  
Defendant.

)  
) NO. 87-2-16506-0  
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) NOTICE OF WITHDRAWAL AND  
) SUBSTITUTION OF COUNSEL  
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TO: WAYNE SNOEY, Plaintiff, and BRIAN J. LINN, his attorney  
  
YOU WILL PLEASE TAKE NOTICE that JAMES G. LEACH of LEACH,  
BROWN & ANDERSEN hereby withdraws as attorney of record for the  
Defendant COMMUNITY CHAPEL AND BIBLE TRAINING CENTER and is  
hereby substituted by MARK R. BUSTO, of SCHWEPPE, KRUG & TAUSEND,  
P. S., and all future pleadings in this matter should be directed  
to him at said address.

NOTICE OF WITHDRAWAL AND  
SUBSTITUTION OF ATTORNEYS

SCHWEPPE, KRUG & TAUSEND, P.S.  
800 WATERFRONT PLACE  
1011 WESTERN AVENUE  
SEATTLE WASHINGTON 98104  
(206) 2231600

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DATED at Seattle, Washington this 21<sup>st</sup> day of March, 1989.

WITHDRAWING ATTORNEY:

LEACH, BROWN & ANDERSEN

By James G. Leach  
James G. Leach

SUBSTITUTING ATTORNEY:

SCHWEPPE, KRUG & TAUSEND, P.S.

By Mark R. Busto  
Mark R. Busto

0147-007\z031589.MRB

NOTICE OF WITHDRAWAL AND  
SUBSTITUTION OF ATTORNEYS

SCHWEPPE, KRUG & TAUSEND, P.S.  
800 WATERFRONT PLACE  
1011 WESTERN AVENUE  
SEATTLE, WASHINGTON 98104  
(206) 223-1600

RECEIVED

MAR 29 1989

SCHWEPPE, KIRGE & TAUSEND

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SUPERIOR COURT OF WASHINGTON  
COUNTY OF

CLERK

WAYNE SNOEY,

Plaintiff,

vs.

COMMUNITY CHAPEL AND BIBLE TRAINING  
CENTER: DONALD LEE BARNETT, in his  
capacity as Pastor of Community Chapel  
and Bible Training Center, and JANE DOE  
BARNETT, his wife, and the marital  
community compose of them.

Defendants.

NO. 87-2-16506-0

STATEMENT OF ARBITRABILITY  
AND NOTE FOR TRIAL SETTING  
(Clerk's Action Required)

TO: The Clerk of the Court and to all Lawyers listed on reverse side:

I. STATEMENT OF ARBITRABILITY [LMAR 2.1(a)]

1.1 [ ] This case is subject to arbitration because the sole relief sought is a money judgment, and it involves no claim in excess of \$25,000.00 exclusive of lawyer's fees, interest and costs. [MAR 1.2]

1.2 [X] The undersigned contends that its claim exceeds \$25,000.00, but for purposes or arbitration waives any claim in excess of \$25,000.00.

1.3 [ ] This case is NOT subject to mandatory arbitration because:

- (a) [ ] Plaintiff's claim exceeds \$25,000.00.
- (b) [ ] Plaintiff seeks relief other than a money judgment.
- (c) [ ] Defendant's counter or cross claim exceeds \$25,000.00.
- (d) [ ] Defendant's counter or cross claim seeks relief other than a money judgment.
- (e) [ ] Case is an appeal from a lower court.

II. NOTE FOR CIVIL TRIAL DOCKET [LR 40]

(Case will not be set for trial unless Statement is filled in above.)

2.1 Nature of Case: 001 9-23-87

2.2 Estimated Length of Trial in Hours: \_\_\_\_\_ Days: \_\_\_\_\_

2.3 Readiness: The undersigned lawyer certifies this case to be at issue in that all pleadings are on file and no affirmative pleadings are unanswered.

DATED: march 28, 1989

Signed Rhonda J. Brown

Important: Type Names and  
Addresses of all other  
Lawyers on reverse side.

W.S.B.A.# 17093

Typed Name Rhonda J. Brown

Lawyer for Plaintiff

Serve all parties; file with CALENDAR CONTROL, E-609, King County Courthouse, MA1(7/85)

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SCOMIS #0065

-ARBITRATION-

EDMUNDSON

MAY 05, 1989

CLERK

CASE NUMBER: 87-2-16506-0  
CASE TYPE: COLLECTION

NOTICE OF APPOINTMENT  
AS ARBITRATOR

WAYNE SNOEY VS COMMUNITY CHAPEL & BIBLE TRAINING CENTER ET AL

TO:

HARRY GOLDMAN  
600 UNIVERSITY, #1700  
SEATTLE, WA 98101  
587-6020

YOU HAVE BEEN APPOINTED ARBITRATOR IN THIS CASE. IF YOU ARE  
UNABLE TO SERVE OR MUST DISQUALIFY YOURSELF, NOTIFY THE  
DIRECTOR OF ARBITRATION IMMEDIATELY (LMAR 3.1).

ATTORNEYS FOR THE PLAINTIFF

ATTORNEYS FOR THE DEFENDANT

RHONDA J. BROWN  
245 S.W. 152ND  
SEATTLE, WA 98166  
242-9876

ROBERT J. ROHAN  
1011 WESTERN AVE., #800  
SEATTLE, WA 98104

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MAY 10 1989

King County Superior Court

Arbitration

KING COUNTY COURTHOUSE

SEATTLE, WASHINGTON 98104

SCHWEPPE, KRUG & TAUSEND

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MAY 11 1989

COPY RECEIVED  
LAW OFFICES OF  
LINN & SCHISEL

Date Rec'd

5/11/89  
LJS

WAYNE SNOEY

PLAINTIFF

SCHWEPPE, KRUG & TAUSEND

NO. 87-2-16506-0

VS.

COMMUNITY CHAPEL & BIBLE  
TRAINING CENTER, ET AL.

DEFENDANT

ARBITRATION SETTLEMENT AND  
ORDER OF REMOVAL FROM THE  
TRIAL CALENDAR

(clerk's action required)

The parties have advised the arbitrator that this case has been settled. It should be removed from the trial calendar.

THIS CASE IS NOT DISMISSED. AN ORDER OF DISMISSAL OR A JUDGMENT MUST BE ENTERED TO CLOSE THE CASE.

DATED: 5/9/89

SIGNED

[Signature]  
Arbitrator

FILE WITH CALENDAR CONTROL, E609, KING COUNTY COURTHOUSE. COPIES TO THE PARTIES AND TO:

ARBITRATION DEPARTMENT  
W855 KING COUNTY COURTHOUSE  
SEATTLE, WASHINGTON 98104

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


WAYNE SNOEY,	)	
	)	NO. 87-2-16506-0
Plaintiff,	)	
	)	AGREED ORDER DISMISSING SUIT
v.	)	WITH PREJUDICE
	)	
COMMUNITY CHAPEL AND BIBLE	)	
TRAINING CENTER; DONALD LEE	)	
BARNETT, in his capacity as	)	
Pastor of Community Chapel and	)	
Bible Training Center, and	)	
JANE DOE BARNETT, his wife, and	)	
the marital community composed	)	
of them,	)	
	)	
Defendant.	)	

THIS MATTER having come before the Court upon the Complaint of Wayne Snoey by and through his attorneys, the Law Offices of Linn & Schisel; the Court having considered the records and files herein and having heard the presentation of counsel, NOW, THEREFORE, it is hereby

ORDERED, ADJUDGED AND DECREED that the Plaintiff's Complaint be dismissed with prejudice.

IT IS FURTHER ORDERED that no costs or fees be awarded any

AGREED ORDER DISMISSING SUIT  
WITH PREJUDICE - 1

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1 party.

2 DONE IN OPEN COURT this 7<sup>th</sup> day of July,  
3 1989.

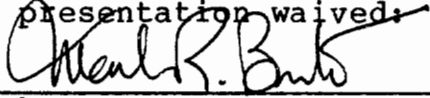
JUL 7 1989  
JACK A. RICHEY  
JUDGE/COURT COMMISSIONER  
COURT COMMISSIONER

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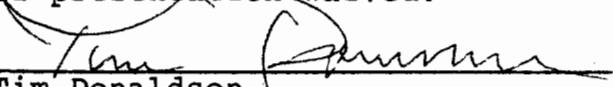
7 LAW OFFICES OF LINN & SCHISEL

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9 \_\_\_\_\_  
10 Brian J. Linn  
11 Attorneys for Plaintiff

12 Approved as to content; notice  
13 of presentation waived:

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16 Mark R. Busto  
17 Attorney for Community Chapel and  
18 Bible Training Center

19 Approved as to content; notice  
20 of presentation waived:

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22 \_\_\_\_\_  
23 Tim Donaldson  
24 Attorney for Donald Lee Barnett  
25 and Jane Doe Barnett

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28 AGREED ORDER DISMISSING SUIT  
WITH PREJUDICE - 2