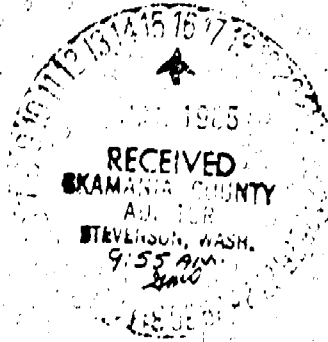




In the Superior Court of the State of Washington
for SKAMANIA County

MARK T. WILDER,

Plaintiff

vs.

SKAMANIA COUNTY, WASHINGTON

and JACK J. PETERSON,

Defendant s

No. 85-2-0003-1

SUMMONS

THE STATE OF WASHINGTON, to the said SKAMANIA COUNTY, WASHINGTON and JACK J. PETERSON

A lawsuit has been started against you in the above entitled court by plaintiff ____ Plaintiff ____ claim is stated in the written complaint, a copy of which is served upon you with this summons.

In order to defend against this lawsuit, you must respond to the complaint by stating your defense in writing, and serve a copy upon the undersigned attorney for the plaintiff ____ within 20 days after the service of this summons, excluding the day of service, if served upon you within this state, and within 60 days after service of this summons, exclusive of the day of service, if served upon you without this state, 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 11 days after you serve the demand, the plaintiff ____ must file this lawsuit with the court, or the service on you of this summons and complaint will be void.

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

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

HALL and HOLLAND

DATED: January 11, 1985

By

Ned Hall

Attorneys for Plaintiff
1100 Broadway
Vancouver, Washington 98660
Telephone (206) 694-3351

1 IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON
2 IN AND FOR THE COUNTY OF SKAMANIA
3

4
5 MARK T. WILDER)

No.

6 Plaintiff,)

7 vs.)

COMPLAINT FOR PERSONAL INJURY
AND DAMAGES

8 SKAMANIA COUNTY WASHINGTON)
9 and JACK J. PETERSON)

10 Defendants.)

11 Plaintiff alleges as follows:

12 I.
13

14 At all times hereinafter mentioned, Mark T. Wilder was
15 and now is an unmarried man and a resident of Skamania County,
16 Washington, and Skamania County Washington was and now is a
17 municipal corporation of the State of Washington, and Jack J.
18 Peterson was a resident of Skamania County and employed by said
19 County.

20 II.

21 On or about the seventh day of August, 1984, plaintiff
22 was driving his automobile in a generally westerly direction on
23 State Route 140 in Skamania County, Washington. At said time and
24 place, defendant Jack J. Peterson was driving an automobile owned
25 by Skamania County, Washington in a generally easterly direction.
26 Defendant carelessly and negligently operated his automobile
27 across the center line of the highway so as to collide with the
28 motor vehicle being operated by the plaintiff herein, so as to
29 cause plaintiff to sustain severe and permanent injuries as here-
30 inafter set forth.
31
32

III.

At all times herein mentioned, Jack J. Peterson was an employee of Skamania County, and was acting on its behalf and in the course and scope of his employment.

IV.

As a direct and proximate result of the negligence of the defendant, plaintiff's automobile was demolished and plaintiff sustained severe, grievous, and permanent bodily injuries, resulting in damages of past, present, and future pain and suffering, both physical and emotional, and resulting in a loss of income from wages and permanently impairing his earning capacity, and loss of enjoyment of life, society, and consortium.

V.

As a further result of the negligence of the defendant, plaintiff has been obliged to incur the following special damages:

Southwest Washington Hospital	\$24,571.99
Vancouver Radiologists	374.25
Bryan R. Laycoe, M.D.	3,980.00
Southwest Washington Cardiology Clinic	19.00
Columbia Surgical Group, P.S.	735.00
American Ambulance	522.50
John F. Colpitts, M.D.	287.00
John B. Zevley, M.D.	1,544.25
M.E. Wood, M.D.	580.00
Stephen C. Kennedy, M.D.	2,670.00
Highland Terrace	3,108.75
Restorative Health Services	1,120.00

In addition, plaintiff has been obliged to pay approximately \$800.00 for drugs and will continue to incur obligations for doctor bills, x-rays, crutches, in amounts unknown, which will be established at time of trial.

VI.

On or about the ninth day of October, 1984, plaintiff duly and regularly presented a claim for damages before the Board of Commissioners of Skamania County, and duly filed the claim with the clerk of said Board.

VII.

All of the above general damages are continuing in nature, and are in amounts not now known, which will be proven at time of trial.

WHEREFORE

Plaintiff prays for judgment against the defendants and each of them, for general damages in an amount to be determined at time of trial and for the amount of special damages determined at time of trial, plus interest thereon from the date of incurrence and for his costs and disbursements in this action to be taxed.

DATED this 11th day of January, 1985.

Ned Hall
Attorney for Plaintiff
WSBA #1655