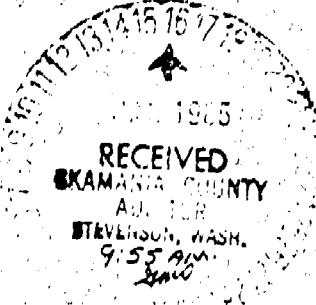


98791



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

MARK T. WILDER,

Plaintiff

No. 85-2-0000 3-1

vs.

SKAMANIA COUNTY, WASHINGTON

and JACK J. PETERSON,

Defendant S

**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's claim is stated in the written complaint, a copy of which is served upon you with this summons.

In order to defend against this lawsuit, you must respond to the complaint by stating your defense in writing, and serve a copy upon the undersigned attorney for the plaintiff, within 20 days after the service of this summons, excluding the day of service, 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 31 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 QB

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

IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON

IN AND FOR THE COUNTY OF SKAMANIA

MARK T. WILDER

No.

Plaintiff,

VS.

**COMPLAINT FOR PERSONAL INJURY  
AND DAMAGES:**

**SKAMANIA COUNTY WASHINGTON**

and JACK J. PETERSON

Defendants.

11 Plaintiff alleges as follows:

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

On or about the seventh day of August, 1984, plaintiff was driving his automobile in a generally westerly direction on State Route 140 in Skamania County, Washington. At said time and place, defendant, Jack J. Peterson was driving an automobile owned by Skamania County, Washington in a generally easterly direction. Defendant carelessly and negligently operated his automobile across the center line of the highway so as to collide with the motor vehicle being operated by the plaintiff herein, so as to cause plaintiff to sustain severe and permanent injuries (as hereinafter set forth).

**COMPLAINT**

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HALL & HIGHLANDS  
ATTORNEYS AT LAW  
110W BROADWAY  
VANCOUVER, WASHINGTON 98602  
AREA CODE 206 467-1000, 467-1011

THE STATE OF WASHINGTON  
IN THE COURT OF APPEALS  
APPEAL FROM THE JUDICIAL BRANCH  
OF THE STATE OF WASHINGTON  
IN THE COUNTY OF SKAMANIA  
CIVIL NO. 100-0000000

1 At all times herein mentioned, Jack J. Peterson was  
2 an employee of Skamania County, and was acting on its behalf  
3 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	\$26,571.99
Vancouver Radiologists	374.25
Bryan H. Laycock, 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.W. Wood, M.D.	530.00
Stephen C. Kennedy, M.D.	2,670.00
Highland Terrace	1,108.75
Restorative Health Services	1,190.00
	22.24

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.

CONPLAINT

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1101 BROADWAY  
VANCOUVER WASHINGTON 98660  
AREA CODE 206 TELEPHONE 454-3341

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.

VTT.

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.

W H E R E F O R E

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

**COMPLAINT.**