

110089

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SKAMANIA WASH
BY *Se. Co. Auditor*

SEP 18 8 52 AM '90

P. Lowry
CLERK

IN THE DISTRICT COURT OF THE STATE OF WASHINGTON
FOR SKAMANIA COUNTY

P.U.D. #1 of SKAMANIA COUNTY,
a municipal corporation,

Plaintiff,

vs.

BETTY (SEITZ) FERGUSON,

Defendant,

and

SKAMANIA COUNTY HOSPITAL
DISTRICT, a municipal
corporation of the State of
Washington,

Garnishee-Defendant.)

NO. 837-C

ANSWER TO WRIT OF
GARNISHMENT FOR
CONTINUING LIEN ON
EARNINGS

Received
Index
Filed
9-21-90
Clerk

ANSWER THE SECOND PART OF THIS FORM WITH RESPECT TO THE
TOTAL AMOUNT OF EARNINGS WITHHELD UNDER THIS GARNISHMENT,
INCLUDING THE AMOUNT, IF ANY, STATED IN YOUR FIRST
ANSWER, AND WITHIN TWENTY (20) DAYS AFTER YOU RECEIVE
THESE FORMS, MAIL OR DELIVER THEM AS DIRECTED IN THE
WRIT.

If you are withholding the Defendant's nonexempt earnings
under a previously served Writ for a continuing lien, answer only
this portion of this form and mail or deliver the forms as directed
in the Writ. Withhold from the Defendant's future nonexempt
earnings as directed in the Writ, and a second set of answer forms
will be forwarded to you later.

ANSWER: I am presently holding the Defendant's nonexempt
earnings under a previous Writ served on _____ that
will terminate not later than _____, 1990.

PUD vs. (Seitz) Ferguson
Answer to Writ of Garnishment for
Continuing Lien on Earnings
Page 1

KIELPINSKI & LOURNE
A PROFESSIONAL SERVICE CORPORATION
ATTORNEYS AT LAW
27 Russell Street • P.O. Box 510
Stevenson, Washington 98648
Telephone (509) 427-5665

1
2
3 If you are NOT withholding the Defendant's earnings under a
4 previously served Writ for a continuing lien, answer the following
5 portion of this form and mail or deliver the forms as directed in
6 the Writ. A second set of answer forms will be forwarded to you
7 later for subsequently withheld earnings.

8 At the time of service of the Writ of Garnishment on the
9 garnishee there was due and owing from the garnishee to the above-
10 named Defendant \$ 375.88 (On the reverse
11 side of this answer form, or on an attached page, give an
12 explanation of the dollar amount stated, or give reasons why there
13 is uncertainty about your answer.)

14 Amount due and owing stated in first answer \$ _____
15 Amount accrued since first answer \$ _____

16 If the above amount or any part of it is for personal earnings
17 (that is compensation payable for personal services, whether called
18 wages, salary, commission, bonus, or otherwise, and including
19 periodic payments pursuant to a pension or retirement program),
20 Garnishee has deducted from this amount \$ _____
21 which is the exemption to which the Defendant is entitled, leaving
22 \$ _____ that garnishee holds under the Writ.
23 The exempt amount is calculated as follows:

Total compensation due Defendant	\$	<u>375.88</u>
LESS deductions for social security		
and withholding taxes and any		
other deduction required by		
law (list separately and identify)		
SS	\$	<u>28.75</u>
WH	\$	<u>13.93</u>
	\$	
	\$	
Disposable Earnings	\$	<u>333.20</u>

24 If the title of this Writ indicates that this is a garnishment
25 under a child support judgment, enter forty percent (40%) of
26 disposable earnings: \$ _____. This amount is exempt and
27 must be paid to the Defendant at the regular pay time.

28 If this is not a garnishment for child support, enter seventy-
five percent (75%) of disposable earnings: \$ 249.90.
From the listing in the following paragraph, choose the amount for
the relevant pay period and enter that amount: \$ _____.
(If amounts for more than one pay period are due, multiply the
preceding amount by the number of pay periods and/or fraction of
pay period for which amounts are due and enter that amount:
\$ _____.) The greater of the amounts entered in this

PUD vs. (Seitz) Ferguson
Answer to Writ of Garnishment for
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1 paragraph is the exempt amount and must be paid to the Defendant
2 at the regular pay time.

3 Minimum exempt amounts for different pay periods: Weekly
4 \$ _____; Biweekly \$ _____; Semimonthly \$ _____;
5 Monthly \$ 249.90.

6 List all of the personal property or effects of Defendant in
7 the garnishee's possession or control when the Writ was served.
8 (Use the reverse side of this answer form or attach a schedule if
9 necessary.)

10 An attorney may answer for the garnishee.

11 Under penalty of perjury, I affirm that I have examined this
12 answer, including accompanying schedules, and to the best of my
13 knowledge and belief it is true, correct and complete.

14 Signature of Garnishee-Defendant

September 18, 1990

Date

15 *Harry M. Olson*
16 Signature of Person Answering
17 for Garnishee

Skamania County Auditor

Connection with Garnishee

Box 790

18 Stevenson, Washington 98648
19 Address of Garnishee

20
21
22
23
24
25
26
27
28 PUD vs. (Seitz) Ferguson
Answer to Writ of Garnishment for
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JAN C. KIELPINSKI
SUSAN K. LOURNE*

*Admitted in Oregon
and Washington

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ALAN L. GALLAGHER**
RICHARD J. BRISKI†
Of Counsel
CHRISTOPHER M. CONSTANTINE

**Admitted in Oregon, Washington,
Pennsylvania and Texas
†Admitted in Illinois and Michigan

August 31, 1990

RECEIVED

SEP - 4 1990

SKAMANIA COUNTY
AUDITOR

Mr. Gary Olson
Skamania County Auditor
PO Box 790
Stevenson, Wa. 98648

Re: PUD vs. Betty Jo (Seitz) Ferguson
Writ of Garnishment
District Court Cause No. 837-C
Our File No. 4051

Dear Mr. Olson:

Enclosed please find the original and three copies of the second Answer to Writ of Garnishment for Continuing Lien on Earnings in the above-referenced matter, together with the appropriate envelopes.

Sincerely,

KIELPINSKI & LOURNE, P.C.

By

Say-Lord
Legal Assistant

gf

Enclosures (7)

Gary M. Olson
County Auditor

Skamania County

OFFICE OF AUDITOR
P. O. Box 790
Stevenson, Washington 98648

Area Code 509
Phone: 427-5141, Ext. 226
Fax: 427-4165

INDEBTEDNESS
[Aug. 8, 1990]

\$ 318.58

Amount withheld
and paid to Court
[Aug. 31, 1990]

\$ 76.40

INDEBTEDNESS
Due

\$ 242.18

Amount withheld
and paid to Court
[Sept. 28, 1990]

\$ 83.30

INDEBTEDNESS
Due

\$ 158.88

Stevenson, Washington,

9-18-90

to COUNTY AUDITOR DR.
Skamania County, Washington

FILING
RECORDING

FILE NO. 110089 AMOUNT *nc*

Agree. & Lease

Liens

Mines

Deed

Mortgage

Satisfactions

Misc.

Surveys

Plats

UCC

Betty (Seitz) Ferguson et al

to

P.U.D. #1 of Skamania County

Mary M. Olson

COUNTY AUDITOR

By

P. Lawry

DEPUTY

25395