

SKAMANIA COUNTY
ORIGINAL FILED

MAY 26 1995

122417

SUPERIOR COURT OF WASHINGTON FOR SKAMANIA COUNTY
Lorena E. Hollis, Clerk

FIBERGLASS SPECIALTIES
CORPORATION, a Washington
Corporation,

Plaintiff,

vs.

SKAMANIA COUNTY WASHINGTON,
a Washington Corporation,

Defendant.

No. 95-2-00075-6

SUMMONS

FILED FOR RECORD
SKAMANIA CO. WASH
BY Skamania Co.

MAY 26 11 40 AM '95

O. Lowry
AUDITOR

GARY H. OLSON

TO THE DEFENDANT: SKAMANIA COUNTY WASHINGTON, a Washington
Corporation:

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's within twenty
(20) days after the service of this Summons if served upon you
within this State, and within sixty (60) days after service of
this Summons if served upon you outside of Washington, excluding
the day of service, or a default judgment may be entered against
you without notice. A default judgment is one in which the
Plaintiff is entitled to what they ask 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 Plaintiff's attorney. 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.

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

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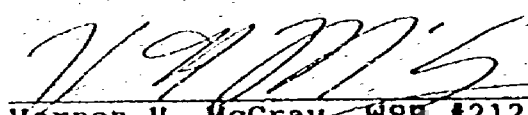
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Boyd, Gaffney, Sowards
McCray & Sundstrom
ATTORNEYS AT LAW
413 N.E. EVERETT STREET
CAMAS, WASHINGTON 98607
834-0282

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

3 Dated this 23 day of May, 1995.

4 BOYD, GAFFNEY, SOWARDS,
5 McCRAY & SUNDSTROM

6 
7 Vernon H. McCray, WSB #21263
8 Of Attorneys for Plaintiff

9 File Response With:

10 SKAMANIA COUNTY COURTHOUSE
11 CLERK OF SUPERIOR COURT
12 P.O. Box 790
13 Stevenson, WA 98648

Serve a Copy of your Response on:

14 BOYD, GAFFNEY, SOWARDS, McCRAY
15 AND SUNDSTROM
16 Attorneys at Law
17 413 NE Everett Street
18 Camas, WA 98607

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SUMMONS - 2

Boyd, Gaffney, Sowards
McCray & Sundstrom
ATTORNEYS AT LAW
413 N.E. EVERETT STREET
CAMAS, WASHINGTON 98607
834-6262

SKAMANIA COUNTY
ORIGINAL FILED

MAY 26 1995

Lorena E. Hollis, Clerk

IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON

IN AND FOR THE COUNTY OF SKAMANIA

FIBERGLASS SPECIALTIES
CORPORATION, a Washington
Corporation,

Plaintiff,

vs.

SKAMANIA COUNTY WASHINGTON,
a Washington Corporation,

Defendant.

No. 95-2-00075-6

COMPLAINT FOR CIVIL
DAMAGES

COMES NOW, Plaintiff, FIBERGLASS SPECIALTIES CORPORATION, by
and through their attorney, VERNON H. MCCRAY, and for claims
against the Defendants allege and aver as follows:

I. JURISDICTION

1.1 This court has jurisdiction because legal relief in excess of
\$10,000.00 as well as equitable relief is requested.

1.2 Plaintiff, FIBERGLASS SPECIALTIES CORPORATION, is a
Washington corporation operating in Skamania County,
Washington.

1.3 The Defendant, SKAMANIA COUNTY is a Municipal Corporation
organized and existing under the laws of the State of
Washington and is empowered to rent, sell, lease and
otherwise manage commercial property in Skamania County,
Washington.

1.4 The Defendant, SKAMANIA COUNTY, is further empowered to
employ agents to maintain and control utilities within the

1 County such as water, gas and electricity.

2 II. FACTUAL ALLEGATIONS

3 2.1 The Plaintiff, FIBERGLASS SPECIALTIES CORPORATION, on or
4 about January 9, 1995 was operating a commercial business at
5 458 1/2 Evergreen Drive, North Bonneville, Washington.

6 2.2 That Defendant, SKAMANIA COUNTY, by and through its agents or
7 assigns did on or about January 9, 1995 intentionally
8 withhold utilities, i.e. water, to the address of 458 1/2
9 Evergreen Drive, North Bonneville, Washington and the
10 business of Fiberglass Specialties Corporation.

11 2.3 That such actions by the Defendant has caused substantial
12 harm to the Plaintiff and its normal operation of the
13 business, in a monetary amount to be determined at time of
14 trial.

15 2.4 That such damages are continuing in nature also in an amount
16 to be determined at time of trial.

17 2.5 That Plaintiff has made claim against Skamania County for
18 such damages, and which claim has gone wholly unanswered,

19 III. PRAYER FOR RELIEF

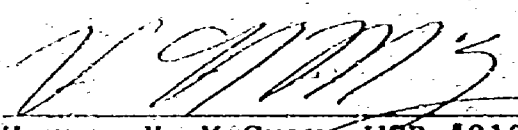
20 3.1 WHEREFORE, Plaintiff prays for a money judgment against
21 Defendant in an amount to be determined at time of trial

22 3.2 That Plaintiff be awarded both pre and post judgment interest
23 on such judgment due to the continuing nature of the damages.

24 3.3 That the Plaintiff be awarded reasonable attorney fees and
25 costs and such further relief as the court deems just and
26

1 equitable.

2 DATED this 23rd day of May, 1995.

3
4 
5 Vernon H. McCray, WSB #21263
6 Of Attorneys for Plaintiff
7 Boyd, Gaffney, Sowards
8 McCray & Sundstrom
9 413 N.E. Everett Street
10 Camas, Washington 98607
11 (360) 834-6262
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AUDITOR
GARY H. OLSON
Fiberglass Specialties
Corp