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Return Address:

Skamania County Auditor

FILED
SKAMANIA COUNTY
Dec 27 1 31 PM '02
J. M. O'NEILL

Document Title(s) or transactions contained herein:	
Petition for Declaratory Judgment	
GRANTOR(S) (Last name, first name, middle initial)	
Skamania County Andersen, Stanley W. etux	
<input type="checkbox"/> Additional names on page _____ of document.	
GRANTEE(S) (Last name, first name, middle initial)	
Bacus, Joseph A.	
<input type="checkbox"/> Additional names on page _____ of document.	
LEGAL DESCRIPTION (Abbreviated: i.e., Lot, Block, Plat or Section, Township, Range, Quarter/Quarter)	
Lots 1-3 Patricia Andersen Short Plat Vol 3 Pg 143	
<input type="checkbox"/> Complete legal on page _____ of document.	
REFERENCE NUMBER(S)	
Skamania County Case No. 02 2 00149 3	
<input type="checkbox"/> Additional numbers on page _____ of document.	
ASSESSOR'S PROPERTY TAX PARCEL/ACCOUNT NUMBER	
03-08-29-0-0-2001-00	
03-08-29-0-0-2002-00	
03-08-29-0-0-2003-00	
<input type="checkbox"/> Property Tax Parcel ID is not yet assigned	
<input type="checkbox"/> Additional parcel numbers on page _____ of document.	
The Auditor/Recorder will rely on the information provided on the form. The Staff will not read the document to verify the accuracy or completeness of the indexing information.	

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

JOSEPH A. BACUS,
91 Sprague Landing Road
Stevenson, WA 98648

Plaintiffs,

vs.

SKAMANIA COUNTY, WA.
and
STANLEY W. and CATHERINE ANDERSEN,
251 Sprague Landing Road
Stevenson, WA 98648

Defendants.

Case No.

02 2 00149 3

SKAMANIA COUNTY

FILED

DEC 10 2002

LORENA E. HOLLIS, CLERK
DEPUTY

PETITION FOR DECLARATORY JUDGMENT

Comes Now the Plaintiff, Joseph Alan Bacus, pro se, and of an for his Motion for Declaratory Judgment states as follows:

1. That the Plaintiff is the owner of Lot 3 of the Patricia Andersen Short Plat located in Skamania County, Washington.
2. That the Defendants Stanley and Katherine Andersen are the owner's of all other lots in the Patricia Anderson Short Plat.
3. That the Defendant Skamania County is a municipal corporation established pursuant to the laws of the State of Washington.
4. That in 1894 a portion of the property now know as the Patricia Andersen Short Plat was subdivided into 17 lots 160 feet deep and 50 feet wide and one lot 150 feet wide and 100 feet deep. This subdivision was recorded as the Plat of Sprague Landing and no lots have ever been developed pursuant to the Plat of Sprague Landing.
5. That on December 18, 2000, the Skamania County board of Commissioners passed into law Ordinance No. 2000-11 which would permit the lots created by the aforementioned Plat of Sprague Landing or a combination of lots created by the aforementioned Plat of Sprague

Landing, through lot line adjustments, to be utilized as building lots as an exception to current zoning, subdivision and short plat ordinances.

6. That Ordinance No. 2000-11 violates state statutes and the state constitution.
7. That Ordinance No. 2000-11 is null and void and of no legal force or effect.

Wherefore, Plaintiff respectfully requests that this Honorable Court enter an Order finding that Ordinance No. 2000-11 is unconstitutional and of no legal force or effect and that the property known as the Patricia Andersen Short Plat can not be developed pursuant to this Ordinance and that Plaintiff be awarded attorney fees and costs of suit.

Date: 12/10/2002

JA Bacus
Plaintiff
Joseph A. Bacus
91 Sprague Landing
Stevenson, WA 98648

I hereby swear that this Petition was hand delivered to the Auditor of Skamania County on 12/10/2002 and hand delivered to the Sheriff of Skamania County for service of process on 12/10/2002.

Date: 12/10/2002

JA Bacus
Plaintiff