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FILED  
SKAMANIA COUNTY  
JUN 30 3 04 PM '03  
O'Saury  
J. MICHAEL O'SAURY

SUPERIOR COURT OF WASHINGTON  
FOR SKAMANIA COUNTY

Accepted  
Entered  
Index  
Filed  
Served

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

Plaintiff,

vs.

SKAMANIA COUNTY, WA

and

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

Defendants.

Case No. 02-2-00149-3

SUMMONS 20 DAYS

TO THE DEFENDANT: A lawsuit has been started against you in the above entitled court by Joseph Alan Bacus, 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 by serving a copy upon the person signing this summons within 20 days after the service of this summons, excluding the day of service, 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 person, you are entitled to notice before a default judgment may be entered.

This lawsuit was filed in the Skamania County Superior Court in case number 02-2-00149-3 on December 10, 2002.

If you wish to seek the advice of an 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.

Date: 6-30-03

  
\_\_\_\_\_  
Plaintiff

Joseph A. Bacus  
91 Sprague Landing  
Stevenson, WA 98648

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

RECEIVED

DEC 10 2002

SKAMANIA COUNTY  
AUDITOR

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  
ORIGINAL FILED  
DEC 10 2002

Lorena E. Hollis, Clerk

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 100 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

J. 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

J. Bacus  
Plaintiff

SUPERIOR COURT OF WASHINGTON  
FOR SKAMANIA COUNTY

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

Plaintiff,

vs.

SKAMANIA COUNTY, WA

and

STANLEY W. and CATHERINE ANDERSEN,  
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Stevenson, WA 98648

Defendants.

Case No. 02-2-00149-3

RETURN OF SERVICE

RETURN OF SERVICE

I, HERBERT HAMBLEN, hereby assert as my affidavit pursuant to Rule 4(g)(2) of the Superior Court Rules that I served the Summons and Complaint in the above captioned matter on the Auditor of Skamania County, Washington, on June 30, 2003.

Date: June 30, 2003 Herbert F. Hamblen

RECEIVED  
JUN 30 2003  
SKAMANIA COUNTY  
AUDITOR

2:56 pm

[Signature]