

149303

Return Address:

Skamania County Auditor

FILED
SKAMANIA COUNTY
BY *Skamania County*
JUL 1 1 50 PM '03
O'Young
J. MICHAEL O'YOUNG, SON

Document Title(s) or transactions contained herein:	
Summons	
GRANTOR(S) (Last name, first name, middle initial)	
Adams County, Asotin County, Benton County, Chelan County, Clallam County, Clark County	
<input checked="" type="checkbox"/> Additional names on page 1 of document.	
GRANTEE(S) (Last name, first name, middle initial)	
Qwest Corporation	<input checked="" type="checkbox"/> Registered <input checked="" type="checkbox"/> Mailed in <input checked="" type="checkbox"/> Mailed <input checked="" type="checkbox"/> Mailed
<input type="checkbox"/> Additional names on page of document.	
LEGAL DESCRIPTION (Abbreviated i.e., Lot, Block, Plat or Section, Township, Range, Quarter, Quarter)	
<input type="checkbox"/> Complete legal on page of document.	
REFERENCE NUMBER(S) of Documents assigned or released:	
<input type="checkbox"/> Additional numbers on page of document.	
ASSESSOR'S PROPERTY TAX PARCEL/ACCOUNT NUMBER	
<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.	

SUPERIOR COURT OF THE STATE OF WASHINGTON
FOR KITTITAS COUNTY

QWEST CORPORATION,

Plaintiff,

v.

ADAMS COUNTY, ASOTIN COUNTY,
BENTON COUNTY, CHELAN COUNTY,
CLALLAM COUNTY, CLARK COUNTY,
COLUMBIA COUNTY, COWLITZ
COUNTY, DOUGLAS COUNTY, FERRY
COUNTY, FRANKLIN COUNTY,
GARFIELD COUNTY, GRANT COUNTY,
GRAYS HARBOR COUNTY, JEFFERSON
COUNTY, KING COUNTY, KITSAP
COUNTY, KITTITAS COUNTY,
Klickitat County, LEWIS COUNTY,
LINCOLN COUNTY, MASON COUNTY,
OKANOGAN COUNTY, PEND OREILLE
COUNTY, PIERCE COUNTY, SAN JUAN
COUNTY, SKAGIT COUNTY,
SKAMANIA COUNTY, SNOHOMISH
COUNTY, SPOKANE COUNTY,
STEVENS COUNTY, THURSTON
COUNTY, WALLA WALLA COUNTY,
WHATCOM COUNTY, WHITMAN
COUNTY, YAKIMA COUNTY, and
WASHINGTON DEPARTMENT OF
REVENUE,

Defendants.

NO. 03-2-00382-7

SUMMONS

RECEIVED

JUL - 1 2003

SKAMANIA COUNTY
AUDITORSUMMONS - 1
[00000-0000/SB031750.274]

COPY

Perkins Cole LLP
1201 Third Avenue, Suite 4800
Seattle, Washington 98101-3099
Phone: (206) 583-8888
Fax: (206) 583-8500

1 **TO THE DEFENDANT:** A lawsuit has been started against you in the above
2 entitled court by Qwest Corporation, plaintiff. Plaintiff's claim is stated in the written
3 complaint, a copy of which is served upon you with this summons.
4

5
6 In order to defend against this lawsuit, you must respond to the complaint by stating
7 your defense in writing, and by serving a copy upon the person signing this summons within
8 20 days after the service of this summons, excluding the day of service, or a default judgment
9 may be entered against you without notice. A default judgment is one where plaintiff is
10 entitled to what it asks for because you have not responded. If you serve a notice of
11 appearance on the undersigned person, you are entitled to notice before a default judgment
12 may be entered.
13

14 You may demand that the plaintiff file this lawsuit with the court. If you do so, the
15 demand must be in writing and must be served upon the person signing this summons.
16 Within 14 days after you serve the demand, the plaintiff must file this lawsuit with the court,
17 or the service on you of this summons and complaint will be void.
18

19 If you wish to seek the advice of an attorney in this matter, you should do so
20 promptly so that your written response, if any, may be served on time.
21

22 This summons is issued pursuant to rule 4 of the Superior Court Civil Rules of the
23 State of Washington.
24

25 DATED: June 25, 2003.
26

27 PERKINS COLE LLP
28

29 By 
30

31 D. Michael Young, WSBA #6391
32

33 Robert L. Mahon, WSBA #26523
34

35 Attorneys for Plaintiff Qwest Corporation
36

37 SUMMONS - 2
38 [00000-0000/5B031750.274]
39

40 Perkins Cole LLP
41 1201 Third Avenue, Suite 4800
42 Seattle, Washington 98101-3099
43 Phone: (206) 583-8888
44 Fax: (206) 583-8500
45
46
47

SUPERIOR COURT OF THE STATE OF WASHINGTON
FOR KITTITAS COUNTY

QWEST CORPORATION,

Plaintiff,

v.

ADAMS COUNTY, ASOTIN COUNTY,
BENTON COUNTY, CHELAN COUNTY,
CLALLAM COUNTY, CLARK COUNTY,
COLUMBIA COUNTY, COWLITZ
COUNTY, DOUGLAS COUNTY, FERRY
COUNTY, FRANKLIN COUNTY,
GARFIELD COUNTY, GRANT COUNTY,
GRAYS HARBOR COUNTY, JEFFERSON
COUNTY, KING COUNTY, KITSAP
COUNTY, KITTITAS COUNTY,
KLICKITAT COUNTY, LEWIS COUNTY,
LINCOLN COUNTY, MASON COUNTY,
OKANOGAN COUNTY, PEND OREILLE
COUNTY, PIERCE COUNTY, SAN JUAN
COUNTY, SKAGIT COUNTY,
SKAMANIA COUNTY, SNOHOMISH
COUNTY, SPOKANE COUNTY,
STEVENS COUNTY, THURSTON
COUNTY, WALLA WALLA COUNTY,
WHATCOM COUNTY, WHITMAN
COUNTY, YAKIMA COUNTY, and
WASHINGTON DEPARTMENT OF
REVENUE.

Defendants.

NO. 03-2-00382-7

COMPLAINT FOR REFUND OF
PROPERTY TAXESCOMPLAINT FOR REFUND OF PROPERTY
TAXES - 1

{00000-0X/G0/S903}750.216}

COPY

Perkins Coie LLP
1201 Third Avenue, Suite 4800
Seattle, Washington 98101-3099
Phone: (206) 583-8888
Fax: (206) 583-8500

1
2 Plaintiff, by and through its counsel, complains of and alleges as follows:
3
4

5 **JURISDICTION AND VENUE**

6 1. This court has jurisdiction over this matter pursuant to Wash. Const. Art. IV,
7 § 6 and RCW 84.68.020.
8

9 2. The properties which are the subject matter of this action are intercounty
10 operating properties belonging to a public service company, the values of which have been
11 assessed by the Washington Department of Revenue. Venue is proper in this court pursuant
12 to RCW 84.68.050.
13
14
15
16
17

18 **PARTIES**

19 3. Plaintiff Qwest Corporation ("Qwest") is a Colorado corporation with
20 headquarters in Denver, Colorado. Qwest is a telephone company within the meaning of
21 RCW 84.12.200(6) and owns operating properties within the meaning of RCW
22 84.12.200(12) in each of the Defendant Counties. Qwest has paid all fees due to the State of
23 Washington.
24
25
26
27
28
29

30 4. Defendant Washington Department of Revenue ("Department"), acting
31 pursuant to RCW 84.12.270, issued an annual assessment of all of Qwest's operating
32 properties located in the State of Washington as of January 1, 2001 and January 1, 2002, and
33 apportioned the value among the Defendant Counties.
34
35
36
37
38

39 5. Defendants Adams County, Asotin County, Benton County, Chelan County,
40 Clallam County, Clark County, Columbia County, Cowlitz County, Douglas County, Ferry
41 County, Franklin County, Garfield County, Grant County, Grays Harbor County, Jefferson
42 County, King County, Kitsap County, Kittitas County, Klickitat County, Lewis County,
43 Lincoln County, Mason County, Okanogan County, Pend Oreille County, Pierce County, San
44
45
46
47

**COMPLAINT FOR REFUND OF PROPERTY
TAXES - 2**

[00000-0000/SB031750.216]

Perkins Coie LLP
1201 Third Avenue, Suite 4800
Seattle, Washington 98101-3099
Phone: (206) 583-8288
Fax: (206) 583-8500

Juan County, Skagit County, Skamania County, Snohomish County, Spokane County, Stevens County, Thurston County, Walla Walla County, Whatcom County, Whitman County, and Yakima County (collectively referred to as "Defendant Counties") are individual counties within the State of Washington, each of which have assessed property taxes on operating properties owned by Qwest and located within each of the respective counties.

GENERAL ALLEGATIONS

6. Pursuant to RCW 84.12, the Department is responsible for determining the equalized assessed value of intercounty telephone company operating property.

7. For taxes assessed in 2001 and payable in 2002, the Department certified the following equalized assessed value for Qwest's operating properties to the respective counties:

County	Real Property	Personal Property	Total
ADAMS	527,961	2,810,871	3,338,832
ASOTIN		2,836,715	2,936,715
BENTON	11,336	1,304,881	1,316,217
CHELAN		19,987	19,987
CLALLAM	2,337,009	22,874,846	25,011,855
CLARK	8,911,868	100,283,380	107,205,248
COLUMBIA	208,074	1,432,263	1,640,337
COWLITZ	2,818,240	28,014,617	30,830,857
DOUGLAS	332,541	1,023,299	1,355,840
FERRY	157,489	162,516	319,985
FRANKLIN	1,513,813	15,547,091	17,060,904
GARFIELD	159,840	1,283,132	1,452,872
GRANT	1,382,688	16,240,255	17,622,923
GRAYS HARBOR	2,297,344	16,964,784	19,262,128

COMPLAINT FOR REFUND OF PROPERTY TAXES - 3

[000000-0000-SB031750.216]

Perkins Coie LLP
1201 Third Avenue, Suite 4800
Seattle, Washington 98101-3099
Phone: (206) 583-8888
Fax: (206) 583-8500

1	JEFFERSON	796,441	9,064,606	9,861,047
2	KING	244,833,982	839,997,367	1,181,881,349
3	KITSAP	7,755,518	59,943,801	65,699,419
4	KITTITAS	418,778	3,988,245	4,407,023
5	KLICKITAT	-	315,546	315,546
6	LEWIS	1,984,941	17,866,851	18,851,792
7	LINCOLN	-	1,074,878	1,074,878
8	MASON	1,308,058	16,189,030	17,497,088
9	OKANOGAN	1,421,737	10,143,531	11,565,268
10	PEND OREILLE	-	227,597	227,597
11	PIERCE	18,935,661	214,768,313	233,703,974
12	SAN JUAN	-	16,288	16,288
13	SKAGIT	-	555,688	555,688
14	SKAMANIA	-	8,983	8,983
15	SNOHOMISH	-	379,691	379,691
16	SPOKANE	18,150,954	158,972,320	176,123,274
17	STEVENS	899,085	10,488,958	11,388,043
18	THURSTON	8,532,906	75,243,735	81,776,641
19	WALLA WALLA	2,940,755	18,048,293	20,987,048
20	WHATCOM	2,845,071	30,245,374	33,090,445
21	WHITMAN	405,737	3,041,488	3,447,226
22	YAKIMA	4,651,478	37,923,878	42,575,355
23	TOTAL	333,587,287	1,813,218,977	2,146,806,244

8. For taxes assessed in 2002 and payable in 2003, the Department certified the following equalized assessed value for Qwest's operating properties to the respective counties:

COMPLAINT FOR REFUND OF PROPERTY
TAXES - 4

(00000-0000/56031750.216)

Persons Call us
1201 Third Avenue, Suite 4800
Seattle, Washington 98101-3099
Phone: (206) 583-8888
Fax: (206) 583-8500

County	Real Property	Personal Property	Total
ADAMS	583,748	3,397,078	3,980,826
ASOTIN	-	3,464,336	3,464,336
BENTON	11,454	1,398,529	1,409,993
CHELAN	-	22,124	22,124
CLALLAM	2,384,608	25,771,537	28,156,145
CLARK	7,403,899	114,247,431	121,651,330
COLUMBIA	216,293	1,689,893	1,906,186
COWLITZ	2,945,770	31,492,595	34,438,365
DOUGLAS	335,728	1,161,856	1,497,584
FERRY	171,535	188,159	359,694
FRANKLIN	1,082,155	16,757,778	17,839,933
GARFIELD	153,261	1,493,806	1,647,067
GRANT	1,540,639	19,515,628	21,056,267
GRAYS HARBOR	2,328,891	19,787,261	22,116,152
JEFFERSON	789,510	10,820,487	11,609,997
KING	249,300,522	1,011,843,237	1,261,143,759
KITSAP	8,198,519	68,588,886	76,787,405
KITTITAS	425,328	4,758,879	5,184,207
Klickitat	-	378,489	378,489
LEWIS	2,111,037	21,163,161	23,274,198
LINCOLN	-	1,313,608	1,313,608
MASON	1,288,538	19,014,204	20,302,742
OKANOGAN	1,571,909	11,685,522	13,257,431
PEND OREILLE	-	273,477	273,477
PIERCE	19,533,728	238,081,781	257,615,509
SAN JUAN	-	17,584	17,584
SKAGIT	-	631,430	631,430
SKAMANIA	-	8,493	8,493

COMPLAINT FOR REFUND OF PROPERTY
TAXES - 5

(00000-0000/88031750 216)

Perkins Cole LLP
1201 Third Avenue, Suite 4800
Seattle, Washington 98101-3099
Phone: (206) 583-8888
Fax: (206) 583-8500

1	SNOHOMISH		443,118	443,118
2	SPOKANE	22,705,188	177,749,198	200,454,386
3	STEVENS	912,078	12,250,821	13,162,897
4	THURSTON	6,778,278	88,183,103	94,961,378
5	WALLA WALLA	2,938,312	23,515,130	26,503,442
6	WHATCOM	2,908,830	36,191,621	39,100,451
7	WHITMAN	412,508	3,485,679	3,908,187
8	YAKIMA	5,838,109	44,844,568	50,482,675
9	TOTAL	345,518,360	2,015,215,943	2,360,732,303

9. Pursuant to RCW 84.12, each of the Defendant Counties entered the equalized assessed value certified by the Department onto its tax rolls. Each Defendant County provided property tax notices to Qwest for each parcel of operating property located within their respective county limits.

10. Qwest paid both the first and second half installments of its 2001 property taxes to each Defendant County involuntarily and under protest pursuant to RCW 84.68.020. Qwest paid the first half of the 2002 property taxes to each Defendant County involuntarily and under protest pursuant to RCW 84.68.020, and will pay the second half of the 2002 property taxes under protest on or before their due date of October 31, 2003.

11. Qwest owns operating property in each of the Defendant Counties, which operating property has been assessed as separate parcels and using separate parcel numbers. To the extent necessary, Qwest will amend this Complaint to identify the parcels and parcel numbers located in each of the Defendant Counties.

COMPLAINT FOR REFUND OF PROPERTY TAXES - 6

[00000-0000/SB031750.216]

Perkins Coie LLP
1201 Third Avenue, Suite 4800
Seattle, Washington 98101-3099
Phone: (206) 583-8888
Fax: (206) 583-8500

FIRST CAUSE OF ACTION
(Unlawful or Excessive Taxation)

12. Qwest incorporates by reference each and every allegation set forth in paragraphs 1-11 above.

13. Qwest alleges that the Department has made fundamental errors in determining the assessed values of the Qwest properties and that, as a result of these errors, the Department and each of the County Defendants have levied an unlawful and excessive property tax on the Qwest properties.

14. Qwest believes that the allocated fair market value of its tangible, taxable Washington property is far less than the value assessed by Defendant Counties and will establish the allocated fair market value at trial.

15. The errors made by the Department and each of the Defendant Counties resulting in the unlawful or excessive tax levies include, but are not limited, to the following:

- (a) failure to perform correctly and accurately the cost, income and market approaches to valuation;
- (b) failure to recognize appropriately all forms of physical, functional and economic depreciation and obsolescence;
- (c) failure to utilize an appropriate capitalization rate, income stream and estimate of expenses;
- (d) failure to properly consider and analyze relevant market data;
- (e) failure to appropriately correlate appraisal methodologies;
- (f) use of methodologies that include value amounts that are not properly attributable to taxable property in each Defendant County; and

COMPLAINT FOR REFUND OF PROPERTY TAXES - 7

[00000-00000/3B031750.216]

Perkins Cole LLP
1201 Third Avenue, Suite 4800
Seattle, Washington 98101-3099
Phone: (206) 583-8888
Fax: (206) 583-8500

1 (g) failure to properly calculate and deduct from the unitary value, as
2 exempt property, the intangible personal property owned by Qwest
3 that is exempt from taxation pursuant to RCW 84.36.070.
4
5
6

7 16. Qwest is entitled to a refund of the portion of property taxes unlawfully levied
8 by Defendants pursuant to RCW 84.68.020 and 84.68.030.
9
10

11 **SECOND CAUSE OF ACTION**
12 **(Violation of Rights to Uniformity and Equal Protection)**
13

14 17. Qwest incorporates by reference each and every allegation set forth in
15 paragraphs 1-16 above.
16

17 18. The Washington Constitution requires that "[a]ll taxes shall be uniform upon
18 the same class of property" and provides that "[a]ll real estate shall constitute one class."
19 Wash. Const., art. VII, § 1. In addition, the Washington and United States Constitutions
20 and statutes prohibit discrimination in taxation. The valuations of the Department of
21 Revenue and the assessments of the Defendant Counties constitute discrimination against
22 Qwest, and the denial to Qwest of the equal protection of the laws, in violation of Article
23 VII, Section 1 of the Washington Constitution; Article I, Section 12 of the Washington
24 Constitution; the Equal Protection and Commerce Clauses of the United States Constitution
25 (Amendment XIV, § 1 and Article I, § 8, respectively); 42 U.S.C. § 1983; and the
26 equalization requirements of Washington law, including, without limitation, RCW 84.12.350
27 and 84.48.080.
28
29
30
31
32
33
34
35
36
37
38
39

40 19. Qwest alleges that as a result of the excessive valuation of Qwest's operating
41 properties, Defendants have levied taxes on Qwest's operating properties at a rate
42 disproportionate to the rate levied on other properties within each respective county.
43
44
45
46
47

**COMPLAINT FOR REFUND OF PROPERTY
TAXES - 8**

[00000-0000/SB031750.215]

Perkins Coie LLP
1201 Third Avenue, Suite 4800
Seattle, Washington 98101-3099
Phone: (206) 583-8888
Fax: (206) 583-8500

20. Defendants' unlawful and excessive taxation violates the state constitutional guarantee of uniform taxation (Wash. Const. art. VII, § 1), and the other protections against discriminatory and unfair taxation referred to in paragraph 18 of this Complaint.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff prays for relief as follows:

1. A declaration that the 2001 assessed valuations of Qwest's properties as determined by Defendants were unlawful and excessive, and were calculated on a fundamentally incorrect basis;
2. A declaration that the 2002 assessed valuations of Qwest's properties as determined by Defendants were unlawful and excessive, and were calculated on a fundamentally incorrect basis;
3. A declaration that the fair market value of Qwest's taxable, tangible Washington property is far less than the amount collectively assessed by Defendants, and in an amount to be established by Qwest at trial;
4. A declaration that Defendants' unlawful and excessive taxation of Qwest's Washington Properties violates Article VII, Section 1 of the Washington Constitution; and
5. A judgment ordering Defendant Counties to refund to Qwest excess property taxes paid on or about April 30, 2002 and October 31, 2002 as a result of the unlawful or excessive assessments by Defendants related to the 2001 assessed valuations, and excess property taxes paid on or about April 30, 2003 and to be paid on or about October 31, 2003 as a result of the unlawful or excessive assessment by Defendants related to the 2002 assessment year, together with interest and costs as allowed by law, including, without limitation, 42 U.S.C. § 1988.

COMPLAINT FOR REFUND OF PROPERTY
TAXES - 9

[00000-0000-SS031750 216]

Perkins Coie LLP
1201 Third Avenue, Suite 4800
Seattle, Washington 98101-3099
Phone: (206) 583-8888
Fax: (206) 583-8500

DATED: June 24, 2003.

PERKINS COIE LLP

By



D. Michael Young, WSBA #6391
Robert L. Mahon, WSBA #26523

Richard G. Smith, ISB #2500
Eugene A. Ritt, ISB #2156
HAWLEY TROXELL ENNIS &
HAWLEY LLP
877 W. Main St., Suite 1000
P.O. Box 1617
Boise, Idaho 83701
Telephone: (208) 344-6000
Facsimile: (208) 342-3829

Attorneys for Plaintiff Qwest Corporation

COMPLAINT FOR REFUND OF PROPERTY
TAXES - 10

[00000-0000/SB031750.216]

Perkins Coie LLP
1201 Third Avenue, Suite 4800
Seattle, Washington 98101-3099
Phone: (206) 583-8888
Fax: (206) 583-8500

CASE TYPE 2
KITTITAS COUNTY SUPERIOR COURT
CASE INFORMATION COVER SHEET

Case Number _____

Case Title Qwest Corporation v. Adams County, et al.

Attorney Name & Bar Membership Number: D. Michael Young WSBA #8391, Robert L. Mahon WSBA #26523, Richard G. Smith ISB #2500, Eugene A. Rittl ISB #2158.

Please check one category that best describes this case for indexing purposes. Accurate case indexing not only saves time in docketing new cases, but helps in forecasting needed judicial resources. Cause of action definitions are listed on the back of this form. Thank you for your cooperation.**APPEAL/REVIEW**

- ___ Administrative Law Review (ALR 2)
- ___ Appeal of a Department of Licensing Revocation (DOL 2)
- ___ Civil, Non-Traffic (LCA 2)
- ___ Civil, Traffic (LCI 2)

CONTRACT/COMMERCIAL

- ___ Breach of Contract (COM 2)
- ___ Commercial Contract (COM 2)
- ___ Commercial Non-Contract (COL 2)
- ___ Third Party Collection (COL 2)

DEFECTIVE RELATIONSHIP

- ___ Meretricious Relationship (MER 2)

DOMESTIC VIOLENCE/HARASSMENT

- ___ Civil Harassment (HAR 2)
- ___ Domestic Violence (DVP 2)
- ___ Foreign Protection Order (FPO 2)
- ___ Vulnerable Adult Protection (VAP 2)

JUDGMENT

- ___ Abstract Only (ABJ 2)
- ___ Foreign Judgment (FJU 2)
- ___ Judgment, Another County (ABJ 2)
- ___ Judgment, Another State (FJU 2)
- ___ Tax Warrant (TAX 2)
- ___ Transcript of Judgment (TRJ 2)

OTHER COMPLAINT/PETITION

- ___ Action to Compel/Confirm Private Binding Arbitration (MSC 2)
- ___ Change of Name (CHN 2)
- ___ Deposit of Surplus Funds (MSC 2)
- ___ Emancipation of Minor (EOM 2)
- ___ Injunction (INJ 2)
- ___ Interpleader (MSC 2)
- ___ Malicious Harassment (MHA 2)
- ___ Minor Settlement (No guardianship) (MST 2)
- ___ Petition for CMI Commitment (Sexual Predator) (PCC 2)
- ___ Seizure of Property from Commission of Crime (SPC 2)
- ___ Seizure of Property Resulting from a Crime (SPR 2)
- ___ Subpoenas (MSC 2)

PROPERTY RIGHTS

- ___ Condemnation (CON 2)
- ___ Foreclosure (FOR 2)
- ___ Land Use Petition (LUP 2)
- ___ Property Fairness (PFA 2)

- ___ Quiet Title (QTI 2)
- ___ Unlawful Detainer (UND 2)
- TORT, MEDICAL MALPRACTICE**
- ___ Hospital (MED 2)
- ___ Medical Doctor (MED 2)
- ___ Other Health Care Professional (MED 2)

TORT, MOTOR VEHICLE

- ___ Death (TMV 2)
- ___ Non-Death Injuries (TMV 2)
- ___ Property Damage Only (TMV 2)

TORT, NON-MOTOR VEHICLE

- ___ Asbestos (PIN 2)
- ___ Other Malpractice (MAL 2)
- ___ Personal Injury (PIN 2)
- ___ Products Liability (TTO 2)
- ___ Property Damage (PRP 2)
- ___ Wrongful Death (WDE 2)

WRIT

- ___ Habeas Corpus (WHC 2)
- ___ Mandamus (WRM 2)
- ___ Restitution (WRR 2)
- ___ Review (WRV 2)

COPY

IF YOU CANNOT DETERMINE THE APPROPRIATE CATEGORY, PLEASE DESCRIBE THE CAUSE OF ACTION BELOW.
Property Tax Refund Action

APPEAL/REVIEW

Administrative Law Review-Petition to the superior court for review of rulings made by state administrative agencies.

Appeal of a Department of Licensing Revocation-Appeal of a DOI revocation (RCW 46.20.308(9)).

Lower Court Appeal-Civil-An appeal for a civil case; excludes traffic infraction and criminal matters.

Lower Court Appeal-Infractions-An appeal for a traffic infraction matter.

CONTRACT/COMMERCIAL

Breach of Contract-Complaint involving monetary dispute where a breach of contract is involved.

Commercial Contract-Complaint involving monetary dispute where a contract is involved.

Commercial Non-Contract-Complaint involving monetary dispute where no contract is involved.

Third Party Collection-Complaint involving a third party over a monetary dispute where no contract is involved.

MERETRICKIOUS RELATIONSHIP

Meretricious Relationship-Petition for distribution of property from a meretricious relationship (i.e., a stable, marital-like relationship where both parties cohabit with knowledge that a lawful marriage between them does not exist).

DOMESTIC**VIOLENCE/ANTIHARASSMENT**

Civil Harassment-Petition for protection from civil harassment.

Domestic Violence-Petition for protection from domestic violence.

Foreign Protection Orders-Any protection order of a court of the United States, or of any state or territory, which is entitled to full faith and credit in this state.

Vulnerable Adult Protection-Petition for protection order for vulnerable adults, as those persons are defined in RCW 74.34.020.

JUDGMENT

Abstract Only-A certified copy of a judgment docket from another superior court, an appellate court, or a federal district court.

Foreign Judgment-Any judgment, decree, or order of a court of the United States, or of any state or territory, which is entitled to full faith and credit in this state.

Judgment, Another County-A certified copy of a judgment docket from another superior court within the state.

Judgment, Another State-Any judgment, decree, or order from another state which is entitled to full faith and credit in this state.

Tax Warrant-A notice of assessment by a state agency creating a judgment/lien in the county in which it is filed.

Transcript of Judgment-A certified copy of a judgment from a court of limited jurisdiction to a superior court in the same county.

OTHER COMPLAINT/PETITION

Action to Compel/Confirm Private Binding Arbitration-Petition to compel or confirm private binding arbitration.

5B031760.034

Change of Name-Petition for a change of name. If change is confidential due to domestic violence/antiharassment see case type S instead.

Deposit of Surplus Funds-Deposit of money or other item with the court.

Emancipation of Minor-Petition by a minor for a declaration of emancipation.

Injunction-Complaint/petition to require a person to do or refrain from doing a particular thing.

Interpleader-Petition for the deposit of disputed earned money from real estate, insurance proceeds, and/or other transaction(s).

Malicious Harassment-Suit involving damages resulting from malicious harassment.

Minor Settlements-Petition for a court decision that an award to a minor is appropriate when no letters of guardianship are required (e.g., net settlement value \$25,000 or less).

Petition for Civil Commitment (Sexual Predator)-Petition for the involuntary civil commitment of a person who 1) has been convicted of a sexually violent offense whose term of confinement is about to expire or has expired, 2) has been charged with a sexually violent offense and who has been determined to be incompetent to stand trial who is about to be released or has been released, or 3) has been found not guilty by reason of insanity of a sexually violent offense and who is about to be released or has been released, and it appears that the person may be a sexually violent predator.

Seizure of Property from the Commission of a Crime-Seizure of personal property which was employed in aiding, abetting, or in the commission of a crime, from a defendant following criminal conviction.

Seizure of Property Resulting from a Crime-Seizure of tangible or intangible property which is the direct or indirect result of a crime, from a defendant following criminal conviction (e.g., remuneration for, or contract interest in, a depiction or account of a crime).

Subpoenas-Petition for a subpoena.

PROPERTY RIGHTS

Condemnation-Complaint involving governmental taking of private property with payment, but not necessarily with consent.

Foreclosure-Complaint involving termination of ownership rights when a mortgage or tax foreclosure is involved, where ownership is not in question.

Land Use Petition-Petition for an expedited judicial review of a land use decision made by a local jurisdiction (RCW 36.70C 040).

Property Fairness-Complaint involving the regulation of private property or restraint of land use by a government entity brought forth by Title 64 RCW.

Quiet Title-Complaint involving the ownership, use, or disposition of land or real estate other than foreclosure.

Unlawful Detainer-Complaint involving the unjustifiable retention of lands or attachments to land, including water and mineral rights.

TORT, MEDICAL MALPRACTICE

Hospital-Complaint involving injury or death resulting from a hospital.

Medical Doctor-Complaint involving injury or death resulting from a medical doctor.

Other Health Care Professional-Complaint involving injury or death resulting from a health care professional other than a medical doctor.

TORT, MOTOR VEHICLE

Death-Complaint involving death resulting from an incident involving a motor vehicle.

Non-Death Injuries-Complaint involving non-death injuries resulting from an incident involving a motor vehicle.

Property Damage Only-Complaint involving only property damages resulting from an incident involving a motor vehicle.

TORT, NON-MOTOR VEHICLE

Asbestos-Complaint alleging injury resulting from asbestos exposure.

Other Malpractice-Complaint involving injury resulting from other than professional medical treatment.

Personal Injury-Complaint involving physical injury not resulting from professional medical treatment, and where a motor vehicle is not involved.

Products Liability-Complaint involving injury resulting from a commercial product.

Property Damages-Complaint involving damage to real or personal property excluding motor vehicles.

Wrongful Death-Complaint involving death resulting from other than professional medical treatment.

WRIT

Writ of Habeas Corpus-Petition for a writ to bring a party before the court.

Writ of Mandamus-Petition for a writ commanding the performance of a particular act or duty.

Writ of Restitution-Petition for a writ restoring property or proceeds; not an unlawful detainer petition.

Writ of Review-Petition for review of the record or decision of a case pending in the lower court; does not include lower court appeals or administrative law reviews.