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Skamania County Auditor

<i>Document Title(s) or transactions contained herein:</i> Summons Case No. 05 2 05118 7
<i>GRANTOR(S) (Last name, first name, middle initial)</i> Skamania County <input type="checkbox"/> Additional names on page _____ of document.
<i>GRANTEE(S) (Last name, first name, middle initial)</i> Keist, Lona <input type="checkbox"/> Additional names on page _____ of document.
<i>LEGAL DESCRIPTION (Abbreviated: i.e., Lot, Block, Plat or Section, Township, Range, Quarter/Quarter)</i> <input type="checkbox"/> Complete legal on page _____ of document.
<i>REFERENCE NUMBER(S) of Documents assigned or released:</i> <input type="checkbox"/> Additional numbers on page _____ of document.
<i>ASSESSOR'S PROPERTY TAX PARCEL/ACCOUNT NUMBER</i> <input type="checkbox"/> Property Tax Parcel ID is not yet assigned <input type="checkbox"/> Additional parcel numbers on page _____ of document.
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1 RECEIVED

2 SEP 29 2005

3 SKAMANIA COUNTY
AUDITOR

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SEP 27 2005

5 IN THE SUPERIOR COURT OF WASHINGTON FOR CLATSOP COUNTY, Clark Co.
Jerome Macias, Clerk

6 LONA KEIST,

7 Plaintiff,

Case No.:

05 2 05118 7

SUMMONS

8 v.

9 SKAMANIA COUNTY, WASHINGTON,

10 Defendant.

11 TO: Defendant above named:

12 A lawsuit has been started against you in the above-entitled Court by the Plaintiff. Plaintiff
13 claim is stated in the written Complaint, a copy of which is served upon you with this Summons.

14 In order to defend against this lawsuit, you must respond to the Complaint by stating your
15 defense in writing, and serve a copy upon the person signing this Summons within twenty (20) days
16 after the service of this Summons if served within the State of Washington, or within sixty (60)
17 days if served outside the State of Washington, excluding the day of service, or a default judgment
18 may be entered against you without notice. A default judgment is one in which Plaintiff entitled to
19 what 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.

20 You may demand that the Plaintiff file this lawsuit with the Court. If you do so, the demand
21 must be in writing and must be served upon the person signing this Summons. Within fourteen
22 (14) days after you serve the demand, the Plaintiff must file this lawsuit with the Court, or the
service upon you of this Summons and Complaint will be void.

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

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

3 DATED this 26 day of Sept, 2005.

5 CARON, COLVEN, ROBISON & SHAFTON, P.S.
6 Of Attorneys for Plaintiff

7
8 
9 BEN SHAFTON, WSB #6280

11 FILE RESPONSE WITH:

12 Clerk of the Superior Court
13 Clark County Courthouse
14 1200 Franklin Street
15 P.O. Box 5000
16 Vancouver, WA 98668

11 SERVE COPY OF RESPONSE ON:

12 Ben Shafton
13 900 Washington Street, Suite 1000
14 Vancouver, WA 98660
15 (360) 699-3001

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SEP 27 2005

JeAnne McBride, Clerk, Clark Co.

IN THE SUPERIOR COURT OF WASHINGTON FOR CLARK COUNTY

LONA KEIST,

Plaintiff,

v.

SKAMANIA COUNTY, WASHINGTON,

Defendant.

Case No.:

05 2 05118 7

COMPLAINT FOR DAMAGES

COMES NOW plaintiff and alleges as follows:

1. Plaintiff is a natural person and an owner of real property in Skamania County, Washington.
2. Skamania County is a governmental entity within the State of Washington.
3. Skamania County has appropriated plaintiff's real property without providing any compensation. As a result, plaintiff has been damaged in amounts to be proven at time of trial.
4. Skamania County's actions in this matter are violative of 42 U.S.C. §1983. As a result, plaintiff is entitled to attorney's fees pursuant to 42 U.S.C. §1988.

///

1 WHEREFORE, plaintiff prays for damages in amounts to be proven at time of trial together
2 with taxable costs and disbursements and an award of reasonable attorney's fees together with such
3 other and further relief as the Court may deem just.

4 DATED this 26 day of Sept, 2005.

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7 
8 BEN SHAFTON, WSB #6280
9 Of Attorneys for Plaintiff
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