

List Of Names, Addresses And Telephone Numbers Of All Parties Requiring Notice:

NAME: Michael Bond
Address: Lee, Smart, Cook, Martin & Patterson
800 Washington Building
1325 Fourth Avenue
Seattle, Washington 98101
Telephone: 624-7990
Attorney For: Defendant (Community Chapel and Bible Training Center)

NAME: Rod Hollenbeck
Address: Evans, Craven & Lackie, P.S.
3400 Columbia Seafirst Center
701 Fifth Avenue
Seattle, Washington 98104
Telephone:
Attorney For: Defendant (Barnetts)

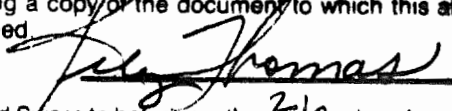
NAME: John Graffe
Address: 1717 First Interstate Center
Seattle, Washington 98104
Telephone: 223-4770
Attorney for:

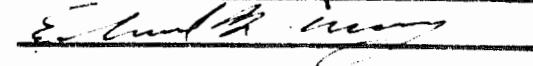
NAME: Jeff Campiche
Address: Kargianis, Austin & Erickson
4700 Columbia Seafirst Center
Seattle, Washington 98104
Telephone: 624-5370
Attorney For:

NAME: Richard H. Adler
Address: 1621 Smith Tower
Seattle, Washington 98104
Telephone:
Attorney For:

STATE OF WASHINGTON } 98
COUNTY OF KING

The undersigned being first duly sworn, on oath states:
That on this day affiant deposited in the mails of the United
States of America's properly stamped and addressed
envelope directed to the attorneys of record of plaintiff/defen-
dant containing a copy of the document to which this af-
fidavit is attached


Subscribed and Sworn to before me this 26 day of
April 19 88 by Kelly Thomas


Notary Public in and for the State of Washington
My Commission Expires: 1-12-91

List Of Names, Addresses And Telephone Numbers Of All Parties Requiring Notice:

NAME: John Messina
-
Messina Duffy
Address: 4002 Tacoma Mall Boulevard
Suite 200
Benj. Franklin Building
Tacoma, Washington 98409

Telephone:

Attorney For:

NAME:

Address:

Telephone:

Attorney For:

NAME:

Address:

Telephone:

Attorney for:

NAME:

Address:

Telephone:

Attorney For:

NAME:

Address:

Telephone:

Attorney For:

CIVIL TRACK 1

CIVIL TRACK ONE
THE HONORABLE GARY LITTLE

SUPERIOR COURT OF WASHINGTON FOR KING COUNTY

FILED
MAY 02 1988
SUPERIOR COURT CLERK
BY *BROWN COOK*
DEPUTY

KATHY LEE BUTLER, et. ux.,)
et. al.,)

Plaintiffs,)

v.)

DONALD LEE BARNETT, et. ux.,)
et. al.,)

Defendants.)

CONSOLIDATED/TRACK
NO. 86-2-18176-8 ✓

DEFENDANTS' MOTION AND
AFFIDAVIT FOR LEAVE TO AMEND.

SANDY EHRLICH, et. ux., et. al.,)

Plaintiffs,)

v.)

RALPH ALSKOG, et. ux., et. al.,)

Defendants.)

MAUREEN P. JORGENSEN,)

Plaintiff,)

v.)

COMMUNITY CHAPEL AND BIBLE
TRAINING CENTER, et. al.,)

Defendants.)

1. Relief Sought. Defendants Donald Barnett and Barbara Barnett move for an order permitting them to amend their answer.

BARNETTS' MOTION/AFF
TO AMEND ANSWER -1
15004789.70

Evans, Craven & Lachic, P. X
LAWYERS

400 FLOOR COLUMBIA CENTER 701 5TH AVENUE
SEATTLE WASHINGTON 98104

(206) 386 5555

SIGNED AND AFFIRMED before me this 29th day of April, 1988.

Susan McWhorter
NOTARY PUBLIC
My Commission Expires 12/20/91

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BARNETTS' MOTION/AFF
TO AMEND ANSWER -3
15004789.70

Evans, Craven & Luckie, P.S.

LAWYERS

500 FLOOR COLUMBIA CENTER 701 5th AVENUE
SEATTLE WASHINGTON 98104

(206) 386 5555

FILED
KING COUNTY WASHINGTON
MAY 03 1988
SUPERIOR COURT CLERK
BY ROBIN COOK
DEPUTY

CIVIL

CIVIL TRACK ONE
THE HONORABLE GARY LITTLE

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SUPERIOR COURT OF WASHINGTON FOR KING COUNTY

KATHY LEE BUTLER, et. ux.,
et. al.,

Plaintiffs,

v.

DONALD LEE BARNETT, et. ux.,
et. al.,

Defendants.

SANDY EHRLICH, et. ux., et. al.,

Plaintiffs,

v.

RALPH ALSKOG, et. ux., et. al.,

Defendants.

MAUREEN P. JORGENSEN,

Plaintiff,

v.

COMMUNITY CHAPEL AND BIBLE
TRAINING CENTER, et. al.,

Defendants.

CONSOLIDATED/TRACK ONE
NO. 86-2-18176-8 ✓

NOTE FOR CIVIL MOTION

(Clerk's Action Required)

TO: THE CLERK OF COURT, and to all parties named below:

NOTE FOR MOTION -1

Evans, Craven & Luckie, P.C.
LAWYERS
410 COLUMBIA CENTER, 201 5th AVENUE
SEATTLE, WASHINGTON 98104
(206) 386-5555

1 PLEASE TAKE NOTICE that an issue of law in this case will be
2 heard on the date below and the Clerk is directed to note this
3 issue on the Civil Motion Calendar.

4 DATE OF HEARING: May 6, 1988

5 TIME OF HEARING: 9:30 a.m.

6 PLACE OF HEARING: Judge Little's Courtroom, King
7 County Courthouse

8 NATURE OF MOTION: Granting Defendants Barnetts Leave
9 to Amend Answer

10 DATED: April 29, 1988

11 EVANS CRAVEN & LACKIE, P.S.
12 3410 Columbia Center
13 Seattle, WA 98104
14 386-5555

15 By Tim Donaldson
16 Tim Donaldson
17 Attorneys for Defendants Barnett

18 OTHER PARTIES REQUIRING NOTICE:

19 Jeff Campiche
20 Kargianis & Austin
21 4700 Columbia Center
22 701 Fifth Aenue
23 Seattle, WA 98104
24
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30 NOTE FOR MOTION -2
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Evans, Craven & Lackie, P.S.
LAWYERS

3410 COLUMBIA CENTER, 701 5TH AVENUE
SEATTLE, WASHINGTON 98104

(206) 386 5555

RECEIVED
JUDICIAL DEPARTMENT
60 APR 29 PM 3:02
KING COUNTY
SUPERIOR COURT

CIVIL TRACK 1

CIVIL TRACK ONE
THE HONORABLE GARY LITTLE

SUPERIOR COURT OF WASHINGTON FOR KING COUNTY

KING COUNTY
MAY 02 1988
SUPERIOR COURT CLERK
BY ROBIN COOK
DEPUTY

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5 KATHY LEE BUTLER, et. ux.,)
6 et. al.,)

7 Plaintiffs,)

8 v.)

9 DONALD LEE BARNETT, et. ux.,)
10 et. al.,)

11 Defendants.)

CONSOLIDATED/TRACK ONE
NO. 86-2-18176-8

(Cause No. 86-2-26360-8)

12 _____)
13 SANDY EHRLICH, et. ux., et. al.,)

14 Plaintiffs,)

15 v.)

16 RALPH ALSKOG, et. ux., et. al.,)

17 Defendants.)

AMENDED
ANSWER OF DEFENDANTS
BARNETT TO PLAINTIFF
JORGENSEN'S AMENDED
COMPLAINT

18 _____)
19 MAUREEN P. JORGENSEN,)

20 Plaintiff,)

21 v.)

22 COMMUNITY CHAPEL AND BIBLE)
23 TRAINING CENTER, et. al.,)

24 Defendants.)
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I. ANSWER

1.1 Answering paragraph 2 defendants Barnett admit same.

30 AMENDED ANSWER OF BARNETTS TO
31 JORGENSEN'S AMENDED COMPLAINT : 1
32 15004881.20

69
Evans, Craven & Luckie, P.S.
LAWYERS

410 FLORENCE COLUMBIA CENTER, 301 5th AVENUE
SEATTLE, WASHINGTON 98101

(206) 386-5555

1 1.2 Answering paragraphs 1 and 6, defendants Barnett deny
2 same as they are without knowledge as to the allegations
3 contained therein.

4 1.3 Answering paragraphs 3, 7, 8, 9, 13, 14, 15, 17, 20,
5 21, 22, 23, 25, 27, 28, 29 and 30, defendants Barnett deny same.

6 1.4 Answering paragraph 4, at all times material hereto,
7 defendants Donald Lee Barnett and Barbara Barnett were husband
8 and wife residing in King County, and Donald Lee Barnett was
9 pastor of the Community Chapel Bible and Training Center.
10 Insofar as paragraph 4 contains other and further factual
11 allegations, defendants deny same.

12 1.5 Answering paragraph 5, at all times material hereto,
13 Donald Lee Barnett and Barbara Barnett were principals, agents,
14 employees or representatives of Community Chapel Bible and
15 Training Center acting within the scope of their representation,
16 employment or agency. Insofar as paragraph 5 contains other and
17 further factual allegations, defendants deny same.

18 1.6 Answering paragraph 10, defendants Barnett admit
19 plaintiff bestowed gifts to Community Chapel and Bible Training
20 Center in the amounts of \$100,000.00 and \$480,000.00. Insofar as
21 paragraph 10 contains other and further factual allegations,
22 defendants deny same.

23 1.7 Answering paragraph 11, defendants Barnett admit that
24 on December 1, 1975 plaintiff made a gift to the Community Chapel
25 and Bible Training Center in the amount of \$480,000.00. Insofar
26 as paragraph 11 contains other and further factual allegations,
27 defendants deny same.

28 1.8 Answering paragraph 12, the note provides in pertinent
29 part:

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31 AMENDED ANSWER OF BARNETTS TO
32 JORGENSEN'S AMENDED COMPLAINT : 2
15004881.20

Evans, Craven & Luckie, P.S.

LAWYERS

1000 COLUMBIA CENTER, 1000 5TH AVENUE
SEATTLE, WASHINGTON 98104

(206) 386-5555

1 This note is secured by a mortgage of even date on real
2 property owned by maker.

3 Defendants admit that no mortgage was given. Insofar as
4 paragraph 12 contains other and further factual allegations,
5 defendants deny same.

6 1.9 Answering paragraph 16, defendants Barnett admit
7 Community Chapel and Bible Training Center did not pay
8 plaintiff's personal medical bills. Insofar as paragraph 16
9 contains other and further factual allegations, defendants deny
10 same.

11 1.10 Answering paragraph 18, defendants Barnett admit
12 plaintiff severed her ties with Community Chapel and Bible
13 Training Center in December of 1985, and that Donald Barnett
14 began to preach his sincere religious belief in the doctrine of
15 spiritual connections in 1985. Insofar as paragraph 18 contains
16 other and further factual allegations, defendants deny same.

17 1.11 Defendants Barnett reallege each and every paragraph
18 of this answer as though fully set forth herein, in response to
19 paragraphs 19, 24 and 26 of plaintiff's amended complaint.
20 Insofar as paragraphs 19, 24 and 26 require further response,
21 defendants deny the same.

22 FOR FURTHER ANSWER and by way of affirmative defenses,
23 defendants allege as follows:

24 II. AFFIRMATIVE DEFENSES

25 2.1 At the insistence of plaintiff, all amounts given to
26 the Community Chapel and Bible Training Center were gifts.

27 2.2 This court lacks subject matter jurisdiction.

28 2.3 Plaintiff has failed to state a claim upon which relief
29 can be granted.

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31 AMENDED ANSWER OF BARNETTS TO
32 JORGENSEN'S AMENDED COMPLAINT : 3
15004881.20

Evans, Craven & Luckie, P. A.

LAWYERS

400 ELLERRE COLUMBIA CENTER, 701 5th AVENUE
SEATTLE, WASHINGTON 98104

(206) 386 5555

1 2.4 Plaintiff's damages, if any, were caused by her own
2 contributory fault.

3 2.5 Plaintiff has failed to mitigate her damages, if any.

4 2.6 Defendants' actions and beliefs are privileged under
5 section 5 and section 11 of Article 1 of the Constitution of the
6 State of Washington; amendment 4, and amendment 34 of the
7 Constitution of the State of Washington; amendment 1 to the
8 Constitution of the United States of America; and amendment 14 to
9 the Constitution to the United States of America.

10 2.7 Defendants are immune from liability through corporate
11 entities.

12 2.8 Plaintiff assumed the risk of her damages, if any.

13 2.9 Plaintiff's damages, if any were caused by persons over
14 whom defendants had no control.

15 2.10 Plaintiff's claims are barred by payment.

16 2.11 Plaintiff's claims are barred by failure of
17 consideration.

18 2.12 Plaintiff's claims are barred by applicable statutes
19 of limitation.

20 2.13 Plaintiff's claims are barred by laches.

21 2.14 Plaintiff's claims are barred by collateral estoppel
22 and/or res judicata.

23 2.15 Plaintiff's claims are barred by estoppel and/or
24 waiver.

25 2.16 All statements, if any, made by Donald Barnett were
26 privileged and true.

27 2.17 Plaintiff has failed to join necessary parties under
28 CR19.

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31 AMENDED ANSWER OF BARNETTS TO
32 JORGENSEN'S AMENDED COMPLAINT : 4
15004881.20

Evans, Craven & Luckie, P.S.
LAWYERS

400 FLORENCE COLUMBIA CENTER, 101 5th AVENUE
SEATTLE, WASHINGTON 98104

(206) 386-5555

FILED
JUDGE
87 MAY -2 PM 2:45
SUPERIOR COURT

CIVIL TRACK 1

CIVIL TRACK ONE
THE HONORABLE GARY LITTLE

SUPERIOR COURT OF WASHINGTON FOR KING COUNTY

KATHY LEE BUTLER, et ux., et al.,)
)
 Plaintiffs,)
)
 v.)
)
 DONALD LEE BARNETT, et ux., et al.,)
)
 Defendants.)

CONSOLIDATED/TRACK ONE
NO. 86-2-18176-8

SANDY ERLICH, et ux, et al.,)
)
 Plaintiffs,)
)
 vs.)
)
 RALPH ALSKOG, et ux, et al.,)
)
 Defendants.)

SUBPOENA DUCES TECUM
RE: ORAL EXAMINATION OF
SPEAKING AGENT

STATE OF WASHINGTON TO: SPEAKING AGENT of COMMUNITY CHAPEL &
BIBLE TRAINING CENTER

YOU ARE HEREBY COMMANDED pursuant to Civil Rule 30 (b)(6) to
appear at the Law Offices of KARGIANIS, AUSTIN & ERICKSON, 47th
Floor, Columbia Center, Seattle, Washington, at 8:30 a.m. of the
20th day of May, 1988, then and there to give testimony, upon oral
deposition, material to the establishment of the plaintiffs' But-
ler, et al., case, in the above-captioned cause of action. Said
deposition is subject to continuance or adjournment from time to
time, or place to place, until completed.

It is the duty of the subpoenaed organization to designate one
or more officers, directors, or managing agents, or other persons,
to testify on its behalf. The person(s) so designated shall
testify as to matters known or reasonably available to the
organization. Said deposition is subject to continuance or
adjournment from time to time, or place to place, until completed.

SUBPEONA DUCES TECUM CR 30(b)(6) - 1

70

The depositions will cover but not be limited to the following matters and you are to bring with you the following:

1 1. Copies of any and all Articles of Incorporation, Bylaws
2 and Amendments thereto regarding the Community Chapel & Bible
3 Training Center.

4 2. All correspondence, memoranda, and other documents**
5 regarding the above listed Articles of Incorporation, Bylaws
6 and Amendments thereto.

7 **NOTE: For the purpose of identifying requested documents:

8 "Document" or "documents" means writings of every
9 kind and character pertaining to the designated
10 subject matter, including, without limitation, the
11 original and any copy regardless of origin or
12 location, of any book, pamphlet, periodical, let-
13 ter, memorandum, diary, file, note, calendar,
14 newspaper or magazine article, statement, bill,
15 invoice, policy, telegram, correspondence, sum-
16 mary, receipt, opinion, investigation statement or
17 report, schedule, manual, financial statement,
18 audit, tax return, articles of incorporation,
19 bylaws, stock book, minute book, agreement, con-
20 tract, deed, security agreement, mortgage, deed of
21 trust, title or other insurance policy, report,
22 record, study, handwritten note, map, drawing,
23 blueprint, working paper, chart, paper, draft,
24 index, tape, microfilm, data sheet, data process-
25 ing card, computer printout, computer program,
26 check, bank statement, passbook, or any other
written, typed, printed, photocopied, dittoed,
mimeographed, multilithed, recorded, transcribed,
punched, taped, filmed, photographic or graphic
matter, however produced, to which you have or
have had access.

3. Originals of any and all tapes, notes, memoranda, letters,
from any of the Elders or Board of Director Members regarding
Pastor Donald Barnett's duties, and the cessation of same.

4. Originals and/or copies of all documents**, of any and
all references to the following Plaintiffs:

- a. Christine Hall f/k/a Christine Bradley,
- b. Sandra Brown,
- c. Lyle Brown,

- d. Tara Brown,
- e. Troy Brown,
- f. Kathy Butler,
- g. Stephen Butler,
- h. Scott Lien, and,
- i. Randy Lien,

5. Copies of any and all documents** regarding the allegations of Donald Barnett's sins of substantial magnitude, and proposed restrictions therefor.

6. Copies of any and all documents** regarding any allegations regarding Donald Barnett's sexual propensities as they involve women congregants, past or present, not his wife.

7. Copies of any and all documents** as authored by Barbara Barnett to the Elders of the Community Chapel & Bible Center regarding Donald Barnett's actions as towards other women and his fitness to be pastor and lead the church.

8. Copies of any and all legal documents restraining Donald Barnett from the premises of the Community Chapel & Bible Training Center and affidavits and declarations in support thereof.

9. Copies of any and all letters, bulletins, articles, documents**, etc. as disseminated or alluded to by reference to the congregation of Community Chapel & Bible Training Center regarding the instant cause of action, herein.

10. Copies of any and all notes, memoranda, documents** made during Jack Hicks' interview with reporter Jim Simon from the Seattle Times on or about March 5, 1988 and thereafter.

11. Copies of any and all notes, memoranda, documents** regarding any financial or legal mal- or misfeasance with accepted practices or other non-compliance by Donald Barnett.

12. Copies of any and all documents**, re: employment contracts, stipends, expense accounts, gratuities, residential housing assistance, salaries, sabbatical stipends, grants or gifts from the Community Chapel & Bible Training Center to Donald Lee Barnett.

*

*

13. Copies of any and all correspondence, documents**, etc.
from the elders regarding spiritual connections.

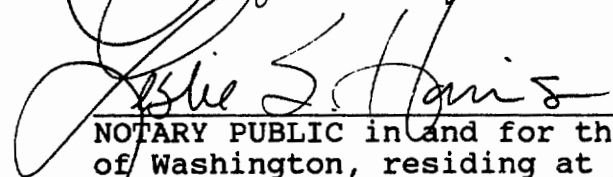
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HEREIN FAIL NOT AT YOUR PERIL.

WITNESS my hand this 27th day of April, 1988.



JEFF CAMPICHE

SUBSCRIBED AND SWORN TO before me this 27th day of April,
1988.



NOTARY PUBLIC in and for the State
of Washington, residing at Seattle
My commission expires: 10/90

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CIVIL TRACK 1

CIVIL TRACK ONE
THE HONORABLE GARY LITTLE
May 6, 1988 at 2:00 p.m.

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

KATHY LEE BUTLER, et ux.,
et al.,

Plaintiffs,

v.

DONALD LEE BARNETT, et ux.,
et al.,

Defendants.

SANDY EHRLICH, et vir., et
al.,

Plaintiffs,

v.

RALPH ALSKOG, et ux., et al.,

Defendants.

MAUREEN P. JORGENSEN,

Plaintiff,

v.

COMMUNITY CHAPEL AND BIBLE
TRAINING CENTER, et al.,

Defendants.

NO. 86-2-18176-8

PLAINTIFF JORGENSEN'S
MOTION AND AFFIDAVIT FOR
ORDER OF DEFAULT

ORIGINAL

KING COUNTY, WASHINGTON
MAY 02 1988
CLERK OF SUPERIOR COURT
BY ROBIN COOK DEPUTY

1. Relief Requested: Plaintiff Maureen P. Jorgensen
("Jorgensen"), by and through her undersigned counsel, moves

71 JB

STATE OF WASHINGTON } 98
COUNTY OF KING

The undersigned, being first duly sworn, on oath states:
That on this day affiant deposited in the mails of the United
States of America's properly stamped and addressed
envelope directed to the attorneys of record of plaintiff/defen-
dant, containing a copy of the document to which this af-
fidavit is attached.

Kelly Thomas

Subscribed and Sworn to before me this 24 day of
April 19 88 by Kelly Thomas

Edward S. [Signature]

Notary Public in and for the State of Washington
My Commission Expires: 1-12-91

1 this court for an order declaring defendants Donald Lee
2 Barnett and Barbara Barnett to be in default.

3 2. Statement of Facts: Defendants Donald Lee Barnett
4 and Barbara Barnett were each duly and regularly served in
5 person with plaintiff Jorgensen's summons and complaint in
6 this action more than twenty (20) days ago and since then have
7 failed to answer or otherwise defend. Venue is proper and
8 based on RCW 4.12.025. The time provided by law for
9 responding has expired and defendants Donald Lee Barnett and
10 Barbara Barnett are now in default.

11 3. Statement of Issue: Whether defendants Donald Lee
12 Barnett and Barbara Barnett are in default.

13 4. Evidence Relied Upon: This motion is based upon the
14 subjoined affidavit of Susan Delanty Jones ("Jones Aff.") and
15 upon the affidavits of service on file with this court, copies
16 of which are attached.

17 5. Authority: This motion is based upon Civil Rule 55.

18 DATED this 26 day of April, 1988.

19 PRESTON, THORGRIMSON,
20 ELLIS & HOLMAN

21
22 By Susan D Jones
23 Susan Delanty Jones
24 Attorneys for Plaintiff,
25 Maureen P. Jorgensen
26

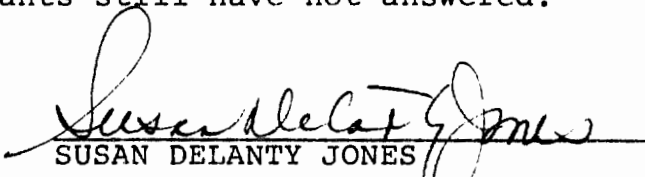
1 STATE OF WASHINGTON)
2) ss.
3 COUNTY OF KING)

4 SUSAN DELANTY JONES, first being duly sworn, on oath
5 deposes and says:

6 1. I am one of the attorneys for plaintiff, Maureen P.
7 Jorgensen, and have personal knowledge of and am competent to
8 testify about the matters set forth in this affidavit.

9 2. Defendants Donald Lee Barnett and Barbara Barnett
10 were each served personally in the State of Washington,
11 on March 20, 1988 and on March 29, 1988, respectively. The
12 affidavits of service, copies of which are attached, are now
13 on file in this action. Venue is proper pursuant to RCW
14 4.12.025. These defendants have not answered and are wholly
15 in default.

16 3. On April 19, 1988, I sent a letter to the attorneys
17 for defendant Barnetts notifying them of the Barnetts' failure
18 to answer, and offering to wait until Friday, April 22, 1988
19 for the answers. In response to a request by Mr. Donaldson,
20 one of the Barnetts' attorneys, I also caused a copy of the
21 original complaint to be supplied to him, with a cover letter
22 dated April 22, 1988, a copy of which is attached. Despite
23 Mr. Donaldson's promises in phone conversations with me
24 following delivery of the April 19 letter to serve the
25 Barnetts' answer, the defendants still have not answered.
26


SUSAN DELANTY JONES

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SIGNED AND SWORN to before me this 26th day of April, 1988 by Susan Delanty Jones.

Shirli A. Simmons

NOTARY PUBLIC in and for the State of Washington

My Commission Expires: 10-10-89.



LAW OFFICES OF
PRESTON, THORGRIMSON, ELLIS & HOLMAN
5400 COLUMBIA SEAFIRST CENTER
701 FIFTH AVENUE
SEATTLE, WASHINGTON 98104-7011
(206) 623-7580

SUSAN DELANTY JONES

TELEX 4740035 TELECOPY (206) 623-7022

April 19, 1988

1735 NEW YORK AVE., N.W. SUITE 8
WASHINGTON, D.C. 20008
(202) 628-1700
TELEX 904088 WSH
TELECOPY (202) 331-1024

420 L STREET, SUITE 404
ANCHORAGE, ALASKA 99501
(907) 276-1989
TELECOPY (907) 276-1368

SEAFIRST FINANCIAL CENTER
SUITE 1480
SPOKANE, WASHINGTON 99201
(509) 624-2100
TELECOPY (509) 456-0146

1230 S.W. 18TH AVENUE, SUITE 301
PORTLAND, OREGON 97204
(503) 225-0819
TELECOPY (503) 248-9085

HAND DELIVERED

Rodney Hollenbeck, Esq.
James Donaldson, Esq.
Evans, Craven & Lackie, P.S.
3400 Columbia Seafirst Center
701 Fifth Avenue
Seattle, Washington 98104

Re: Butler, et ux., et al. v. Barnett, et ux., et al.
King Co. Cause No. 86-2-18176-8

Dear Counsel:

Because you objected on behalf of both Donald and Barbara Barnett to Maureen Jorgensen's motion to consolidate, we assume your firm represents both of the Barnetts in this case. We have not, however, received a Notice of Appearance in response to Jorgensen's amended complaint naming the Barnetts as defendants.

We served Donald Barnett with the Amended Complaint on March 20, 1988, and Barbara Barnett on March 29, 1988. More than twenty days have elapsed, and neither has served an answer.

We are willing to wait until noon on Friday, April 22, 1988 for the answers, but will otherwise file a motion for an order of default against the Barnetts on Friday afternoon.

We look forward to your early response.

Very truly yours,

PRESTON, THORGRIMSON,
ELLIS & HOLMAN

By 
Susan Delanty Jones

SDJ:cjw
cc: Maureen Jorgensen

PGBRN002

LAW OFFICES OF
PRESTON, THORGRIMSON, ELLIS & HOLMAN

5400 COLUMBIA SEAFIRST CENTER
701 FIFTH AVENUE
SEATTLE, WASHINGTON 98104-7011
(206) 623-7580

TELEX 4740035 TELECOPY (206) 623-7022

WASHINGTON, D.C.
1738 NEW YORK AVE., N.W., SUITE 800
WASHINGTON, D.C. 20006
(202) 628-1700
TELEX 904088 WSH
TELECOPY (202) 331-1024

ANCHORAGE
420 L STREET, SUITE 404
ANCHORAGE, ALASKA 99501
(907) 278-1888
TELECOPY (907) 278-1388

SPOKANE
SEAFIRST FINANCIAL CENTER
SUITE 1450
SPOKANE, WASHINGTON 99201
(509) 824-8100
TELECOPY (509) 456-046

PORTLAND
PRESTON, ELLIS & HOLMAN
1230 S.W. 1ST AVENUE, SUITE 300
PORTLAND, OREGON 97204
(503) 225-0815
TELECOPY (503) 248-9085

April 22, 1988

Tim Donaldson, Esq.
Evans, Craven & Lackie, P.S.
3400 Columbia Seafirst Center
701 Fifth Avenue
Seattle, Washington 98104

ATTENTION: Tricia

Re: Jorgensen v. Community Chapel


Dear Tricia:

Pursuant to your request on behalf of Mr. Donaldson, enclosed is a copy of the complaint in the above matter; there are no exhibits other than the promissory note attached as Exhibit 1 to the complaint. We understand that you have a copy of the first amended complaint in your file.

Feel free to call if you have any questions.

Very truly yours,

PRESTON, THORGRIMSON,
ELLIS & HOLMAN

By 
Catherine J. Windroth
Secretary to Susan Delanty Jones

:cjw
Enclosure

PGBRN004

MAUREN P. JORGENSEN,

AFFIDAVIT OF SERVICE OF

vs.

Plaintiff

**COMMUNITY CHAPEL AND BIBLE
TRAINING CENTER, A WASHINGTON
NON-PROFIT CORPORATION,**

Defendant

Garnishee Defendant

**SUMMONS ON FIRST AMENDED
COMPLAINT FOR DAMAGES AND
EQUITABLE RELIEF, FIRST
AMENDED COMPLAINT FOR DAMAGES
AND EQUITABLE RELIEF**

State of Washington

County of King

ss.

The writ served was accompanied by four answer forms and three postage prepaid envelopes which were pre-addressed to the Clerk of the Court, to the Plaintiff or his attorney, and to the Defendant, and cash or check payable to the garnishee, to the amount of Ten Dollars

A copy of the summons served is attached hereto

The undersigned, being first duly sworn, on oath deposes and says: That he is now and at all times herein mentioned was a citizen of the United States and resident of the State of Washington, over the age of eighteen years, not a party to or interested in the above entitled action and competent to be a witness therein.

That on 3/20/88 at 7:00a M. at 416 SW 192nd, Seattle

King County, Washington, affiant duly served the above-described documents in the above-entitled matter upon

Donald Lee Barnett

by then and there personally delivering a true and correct copy thereof to and leaving same with

Donald Lee Barnett

RESIDENCE SERVICE

That at the time and place set forth above affiant duly served the above described documents in the above-entitled matter upon

by then and there, at the residence and usual place of abode of said person(s), personally delivering true and correct copy(ies) thereof to and leaving the same with

being a person of 19 years of age and discretion then resident therein.

Affiant further states that he is informed and believes, and therefore alleges, that neither of said defendants is in the military service of the United States.

_____ TRIPS @ _____ MILES

Subscribed and Sworn to before me 3/22/88

R. Davis
R. Davis

gj

SERVICE ATTEMPTED AT:

NOTARY PUBLIC in and for the State
of Washington, residing at Seattle

Service Fees 6.00 Travel 13.00 Return Fee 5.00 Cert. Mail _____ Total \$24.00

MAUREEN P. JORGENSEN,

AFFIDAVIT OF SERVICE OF

vs.

Plaintiff

**COMMUNITY CHAPEL AND BIBLE
TRAINING CENTER, A WASHINGTON
NON-PROFIT CORPORATION, ET AL.,**

Defendant

**SUMMONS ON FIRST AMENDED
COMPLAINT FOR DAMAGES AND
EQUITABLE RELIEF, FIRST
AMENDED COMPLAINT FOR DAMAGES
AND EQUITABLE RELIEF**

Garnishee Defendant

State of Washington

County of King

ss.

The writ served was accompanied by four answer forms and three postage prepaid envelopes which were pre-addressed to the Clerk of the Court, to the Plaintiff or his attorney, and to the Defendant, and cash or check payable to the garnishee, to the amount of Ten Dollars.

A copy of the summons served is attached hereto

The undersigned, being first duly sworn, on oath deposes and says: That he is now and at all times herein mentioned was a citizen of the United States and resident of the State of Washington, over the age of eighteen years, not a party to or interested in the above entitled action and competent to be a witness therein.

That on 3-29-88 at 7:30 P. M., at 217 South 168th, Seattle

King County, Washington, affiant duly served the above-described documents in the above-entitled matter upon Barbara Barnett

by then and there personally delivering a true and correct copy thereof to and leaving same with Barbara Barnett

RESIDENCE SERVICE

That at the time and place set forth above affiant duly served the above described documents in the above-entitled matter upon _____

by then and there, at the residence and usual place of abode of said person(s), personally delivering _____ true and correct copy(ies) thereof to and leaving the same with _____

being a person of suitable age and discretion then resident therein.

Affiant further states that he is informed and believes, and therefore alleges, that neither of said defendants is in the military service of the United States.

_____ TRIPS @ _____ MILES

Subscribed and Sworn to before me 3-30-88

R. Davis R

SERVICE ATTEMPTED AT:

NOTARY PUBLIC in and for the State of Washington, residing at Seattle

Service Fees 6.00 Travel 28.00 Return Fee 5.00 Cert. Mail Total \$ 39.00

CIVIL TRACK 1

CIVIL TRACK ONE
THE HONORABLE GARY LITTLE

SUPERIOR COURT OF WASHINGTON FOR KING COUNTY

KATHY LEE BUTLER, et. ux.,)
et. al.,)

Plaintiffs,)

v.)

DONALD LEE BARNETT, et. ux.,)
et. al.,)

Defendants.)

CONSOLIDATED/TRACK ONE
NO. 86-2-18176-8

AMENDED
ANSWER OF DEFENDANTS
BARNETT TO PLAINTIFF
JORGENSEN'S AMENDED
COMPLAINT

SANDY EHRlich, et. ux., et. al.,)

Plaintiffs,)

v.)

RALPH ALSKOG, et. ux., et. al.,)

Defendants.)

MAUREEN P. JORGENSEN,)

Plaintiff,)

v.)

COMMUNITY CHAPEL AND BIBLE)
TRAINING CENTER, et. al.,)

Defendants.)

I. ANSWER

1.1 Answering paragraph 2 defendants Barnett admit same.

AMENDED ANSWER OF BARNETTS TO
JORGENSEN'S AMENDED COMPLAINT : 1
15004881.20

Evans, Craven & Lackie, P.S.
LAWYERS

416 FLOOR COLUMBIA CENTER, 301 5th AVENUE
SEATTLE WASHINGTON 98104

(206) 386-5555

1 1.2 Answering paragraphs 1 and 6, defendants Barnett deny
2 same as they are without knowledge as to the allegations
3 contained therein.

4 1.3 Answering paragraphs 3, 7, 8, 9, 13, 14, 15, 17, 20,
5 21, 22, 23, 25, 27, 28, 29 and 30, defendants Barnett deny same.

6 1.4 Answering paragraph 4, at all times material hereto,
7 defendants Donald Lee Barnett and Barbara Barnett were husband
8 and wife residing in King County, and Donald Lee Barnett was
9 pastor of the Community Chapel Bible and Training Center.
10 Insofar as paragraph 4 contains other and further factual
11 allegations, defendants deny same.

12 1.5 Answering paragraph 5, at all times material hereto,
13 Donald Lee Barnett and Barbara Barnett were principals, agents,
14 employees or representatives of Community Chapel Bible and
15 Training Center acting within the scope of their representation,
16 employment or agency. Insofar as paragraph 5 contains other and
17 further factual allegations, defendants deny same.

18 1.6 Answering paragraph 10, defendants Barnett admit
19 plaintiff bestowed gifts to Community Chapel and Bible Training
20 Center in the amounts of \$100,000.00 and \$480,000.00. Insofar as
21 paragraph 10 contains other and further factual allegations,
22 defendants deny same.

23 1.7 Answering paragraph 11, defendants Barnett admit that
24 on December 1, 1975 plaintiff made a gift to the Community Chapel
25 and Bible Training Center in the amount of \$480,000.00. Insofar
26 as paragraph 11 contains other and further factual allegations,
27 defendants deny same.

28 1.8 Answering paragraph 12, the note provides in pertinent
29 part:

30
31 AMENDED ANSWER OF BARNETTS TO
32 JORGENSEN'S AMENDED COMPLAINT : 2
15004881.20

Evans, Crockett Luckie, P.S.

LAWYERS

400 CENTRE COLUMBIA CENTER, 300 AVENUE
SEATTLE, WASHINGTON 98104

206-386-5555

1 This note is secured by a mortgage of even date on real
2 property owned by maker.

3 Defendants admit that no mortgage was given. Insofar as
4 paragraph 12 contains other and further factual allegations,
5 defendants deny same.

6 1.9 Answering paragraph 16, defendants Barnett admit
7 Community Chapel and Bible Training Center did not pay
8 plaintiff's personal medical bills. Insofar as paragraph 16
9 contains other and further factual allegations, defendants deny
10 same.

11 1.10 Answering paragraph 18, defendants Barnett admit
12 plaintiff severed her ties with Community Chapel and Bible
13 Training Center in December of 1985, and that Donald Barnett
14 began to preach his sincere religious belief in the doctrine of
15 spiritual connections in 1985. Insofar as paragraph 18 contains
16 other and further factual allegations, defendants deny same.

17 1.11 Defendants Barnett reallege each and every paragraph
18 of this answer as though fully set forth herein, in response to
19 paragraphs 19, 24 and 26 of plaintiff's amended complaint.
20 Insofar as paragraphs 19, 24 and 26 require further response,
21 defendants deny the same.

22 FOR FURTHER ANSWER and by way of affirmative defenses,
23 defendants allege as follows:

24 II. AFFIRMATIVE DEFENSES

25 2.1 At the insistence of plaintiff, all amounts given to
26 the Community Chapel and Bible Training Center were gifts.

27 2.2 This court lacks subject matter jurisdiction.

28 2.3 Plaintiff has failed to state a claim upon which relief
29 can be granted.

30 AMENDED ANSWER OF BARNETTS TO
31 JORGENSEN'S AMENDED COMPLAINT : 3
32 15004881.20

Evans, Craven & Luckie, P. S.

LAWYERS

34th FLOOR COLUMBIA CENTER 701 5th AVENUE
SEATTLE WASHINGTON 98104

(206) 386-5555

1 2.4 Plaintiff's damages, if any, were caused by her own
2 contributory fault.

3 2.5 Plaintiff has failed to mitigate her damages, if any.

4 2.6 Defendants' actions and beliefs are privileged under
5 section 5 and section 11 of Article 1 of the Constitution of the
6 State of Washington; amendment 4, and amendment 34 of the
7 Constitution of the State of Washington; amendment 1 to the
8 Constitution of the United States of America; and amendment 14 to
9 the Constitution to the United States of America.

10 2.7 Defendants are immune from liability through corporate
11 entities.

12 2.8 Plaintiff assumed the risk of her damages, if any.

13 2.9 Plaintiff's damages, if any were caused by persons over
14 whom defendants had no control.

15 2.10 Plaintiff's claims are barred by payment.

16 2.11 Plaintiff's claims are barred by failure of
17 consideration.

18 2.12 Plaintiff's claims are barred by applicable statutes
19 of limitation.

20 2.13 Plaintiff's claims are barred by laches.

21 2.14 Plaintiff's claims are barred by collateral estoppel
22 and/or res judicata.

23 2.15 Plaintiff's claims are barred by estoppel and/or
24 waiver.

25 2.16 All statements, if any, made by Donald Barnett were
26 privileged and true.

27 2.17 Plaintiff has failed to join necessary parties under
28 CR19.

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31 **AMENDED ANSWER OF BARNETTS TO**
32 **JORGENSEN'S AMENDED COMPLAINT : 4**
15004881.20

Evans, Craven & Luckie, P.S.
LAWYERS

34th FLOOR COLUMBIA CENTER 701 5th AVENUE
SEATTLE WASHINGTON 98104

(206) 386-5555

CIVIL TRACK 1

Licker

CIVIL TRACK ONE
THE HONORABLE GARY LITTLE

FILED
SUPERIOR COURT, WASHINGTON
MAY 05 1988
SUPERIOR COURT CLERK
BY ROBIN COOK
DEPUTY

SUPERIOR COURT OF WASHINGTON FOR KING COUNTY

KATHY LEE BUTLER, et. ux.,
et. al.,

Plaintiffs,

v.

DONALD LEE BARNETT, et. ux.,
et. al.,

Defendants,

Third Party Plaintiffs,

v.

GARY LIEN,

Third Party Defendant.

SANDY EHRLICH, et. ux., et. al.,

Plaintiffs,

v.

RALPH ALSKOG, et. ux., et. al.,

Defendants.

MAUREEN P. JORGENSEN,

Plaintiff,

v.

COMMUNITY CHAPEL AND BIBLE
TRAINING CENTER, et. al.,

Defendants.

BARNETTS' AMENDED ANSWER : 1
15004789.21

CONSOLIDATED/TRACK ONE
NO. 86-2-18176-8

PROPOSED

DEFENDANT BARNETTS' AMENDED
ANSWER, AFFIRMATIVE DEFENSES
COUNTERCLAIMS, CROSS-CLAIMS
AND THIRD PARTY COMPLAINT AS
TO THE BUTLER, ET. AL.,
COMPLAINT

Evans, Craven & Luckie, P.S.
LAWYERS

34th FLOOR COLUMBIA CENTER, 701 5th AVENUE
SEATTLE WASHINGTON 98104

(206) 386-5555

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I. ANSWER

1.1 Answering paragraphs 1, 3(E)(F)(H)(I)(J)(M)(N)(O)(P)(R)(S)(T)(U)(V)(W)(X)(Y)(Z)(AA)(BB)(CC) defendants deny same.

1.2 Answering paragraph 2(A)(B)(C)(D)(E), 3(D), defendants have insufficient knowledge to form a belief and therefore deny same.

1.3 Answering paragraph 3(A), defendants allege at all times material hereto, defendants Donald Lee Barnett and Barbara Barnett were husband and wife residing in King County, and Donald Lee Barnett was pastor of the Community Chapel Bible and Training Center. Insofar as paragraph 3(A) contains other and further factual allegations, defendants deny same.

1.4 Answering paragraph 3(B), defendants allege at all times material hereto, Donald Lee Barnett and Barbara Barnett were principals, agents, employees or representatives of Community Chapel Bible and Training Center acting within the scope of their representation, employment or agency. Insofar as paragraph 3(B) contains other and further factual allegations, defendants deny same.

1.5 Answering paragraphs 3(C), defendants admit same.

1.6 Answering paragraph 3(G), defendants allege that Donald Barnett was a pastor at Community Chapel and Bible Training Center at all times material hereto, and that he did perform counseling. Insofar as paragraph 3(G) contains other and further factual allegations, defendants deny same.

1.7 Answering paragraph 3(K), defendants admit Sandi Lee and Lyle David Brown are the parents of Tara Lynn and Troy Steven

BARNETTS' AMENDED ANSWER : 2
15004789.21

Evans, Crawford Luckie, P.C.

LAWYERS

400 E. WASHINGTON STREET, SUITE 1000
SEATTLE, WASHINGTON 98102

2061088-0000

1 Brown. Insofar as paragraph 3(K) contains other and further
2 factual allegations, defendants deny same.

3 1.8 Answering paragraph 3(L), defendants admit Kathy Lee
4 Butler is the mother of Scott William and Randy William Lien.
5 Insofar as paragraph 3(L) contains other and further factual
6 allegations, defendants deny same.

7 1.9 Answering paragraph 3(Q), defendants allege that Donald
8 Barnett did preach his sincere religious belief in spiritual
9 connections. Insofar as paragraph 3(Q) contains other and
10 further factual allegations, defendants deny same.

11 **II. FIRST CAUSE OF ACTION**

12 2.1 Answering paragraph A, defendants reallege each and
13 every answer previously set forth in this answer as though fully
14 set forth herein.

15 2.2 Answering paragraph B, defendants deny same.

16 **III. SECOND CAUSE OF ACTION**

17 3.1 Answering paragraph A, defendants reallege each and
18 every answer previously set forth in this answer as though fully
19 set forth herein.

20 3.2 Answering paragraph B, C, D, E and F, defendants deny
21 same.

22 **IV. THIRD CAUSE OF ACTION**

23 4.1 Answering paragraph A, defendants reallege each and
24 every answer previously set forth in this answer as though fully
25 set forth herein.

26 4.2 Answering paragraphs B and C, defendants deny same.

27 **V. FOURTH CAUSE OF ACTION**

28 5.1 Answering paragraph A, defendants reallege each and
29 every answer previously set forth in this answer as though fully
30 set forth herein.

31 BARNETTS' AMENDED ANSWER : 3
32 15004789.21

Evans, Craven & Luckie, P.S.
LAWYERS

615 FLOOR COLUMBIA CENTER, 701 5th AVENUE
SEATTLE, WASHINGTON 98104

(206) 386-5555

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XIV. AFFIRMATIVE DEFENSES

14.1 This court lacks subject matter jurisdiction.

14.2 Plaintiffs have failed to state a claim upon which relief can be granted.

14.3 Plaintiffs' damages, if any, were caused by their own contributory fault.

14.4 Plaintiffs have failed to mitigate their damages, if any.

14.5 Defendants' actions and beliefs are privileged under section 5 and section 11 of Article 1 of the Constitution of the State of Washington; amendment 4, and amendment 34 of the Constitution of the State of Washington; amendment 1 to the Constitution of the United States of America; and amendment 14 to the Constitution to the United States of America.

14.6 Defendants are immune from liability through corporate entities.

14.7 Plaintiffs assumed the risk of their damages, if any.

14.8 Plaintiffs' damages, if any were caused by persons over whom defendants had no control.

14.9 Plaintiffs' claims are barred by applicable statutes of limitation.

14.10 Plaintiffs' claims are barred by laches.

14.11 Plaintiffs' claims are barred by estoppel and/or waiver.

14.12 All statements made, if any, were privileged, true and without fault.

BARNETTS' AMENDED ANSWER : 6
15004789.21

Evans, Craven & Luckie, P. S.
LAWYERS

34th FLOOR COLUMBIA CENTER 701 5th AVENUE
SEATTLE WASHINGTON 98104

(206) 386-5555

1 FOR FURTHER ANSWER and by way of counterclaim, defendants
2 allege as follows:

3 **XV. COUNTERCLAIM AGAINST KATHY LEE BUTLER**

4 15.1 At all times material hereto, Kathy Butler was mother
5 of Scott Lien and Randy Lien.

6 15.2 Damages to Scott Lien and Randy Lien, if any, were
7 caused by the fault of Kathy Lee Butler.

8 15.3 Kathy Lee Butler is liable for contribution and/or
9 indemnity to defendants in an amount to be proven at trial.

10 **XVI. COUNTERCLAIM AGAINST SANDI LEE BROWN AND LYLE DAVID BROWN**

11 16.1 At all times material hereto, Sandi Lee Brown and Lyle
12 David Brown were parents of Tara Lynn and Troy Steven Brown.

13 16.2 Damages to Tara Lynn and Troy Steven Brown, if any,
14 were caused by the fault of Sandi Lee Brown and Lyle David Brown.

15 16.3 Sandi Lee Brown and Lyle David Brown are liable for
16 contribution and/or indemnity to defendants in an amount to be
17 proven at trial.

18 **XVII. COUNTERCLAIM AGAINST SANDI LEE BROWN**

19 17.1 At all times material hereto, Sandi Lee Brown was the
20 wife of Lyle David Brown.

21 17.2 Damages to Lyle David Brown, if any, were caused by the
22 fault of Sandi Lee Brown.

23 17.3 Sandi Lee Brown is liable for contribution and/or
24 indemnification to defendants in an amount to be proven at trial.

25 **XVIII. COUNTERCLAIM AGAINST ALL PLAINTIFFS**

26 18.1 Plaintiffs' causes of action against these defendants
27 are frivolous and advanced without reasonable cause and
28 defendants are therefore entitled to reasonable expenses,
29 including attorney's fees incurred in defending this action
30 pursuant to RCW 4.84.185.

31 BARNETTS' AMENDED ANSWER : 7
32 15004789.21

Evans, Craven & Lockie, P.S.
LAWYERS

1000 COLUMBIA CENTER, 201 5TH AVENUE
SEATTLE, WASHINGTON 98104

(206) 386-5555

1 XIX. COUNTERCLAIM AGAINST CHRISTINE KATHY HALL

2 19.1 At all times material hereto, Christine Kathy Hall was
3 the wife of Donald T. Hall.

4 19.2 Damages to Donald T. Hall, if any, were caused by the
5 fault of Christine Kathy Hall.

6 19.3 Christine Kathy Hall is liable for contribution and/or
7 indemnification to defendants in an amount to be proven at trial.

8 FOR FURTHER ANSWER and by way of cross-claim, defendants
9 Barnett allege as follows:

10 XX. CROSS-CLAIM

11 20.1 Plaintiffs' damages, if any, were caused by co-
12 defendants herein, and defendants are entitled to contribution
13 and/or indemnity.

14 20.2 At all times material hereto, Donald Lee Barnett and
15 Barbara Barnett were acting within the scope of their employment
16 and/or agency of the Community Chapel and Bible Training Center
17 and the Barnetts are entitled to indemnification for their
18 liability, if any, upon claims of plaintiffs.

19 FOR FURTHER ANSWER, and by way of third-party complaint,
20 defendants allege as follows:

21 XXI. THIRD-PARTY COMPLAINT AGAINST GARY LIEN

22 21.1 At all times material hereto, Gary Lien was the father
23 of Scott and Randy Lien, residing in King County.

24 21.2 Damages to Scott Lien and Randy Lien, if any, were
25 caused by the fault of Gary Lien.

26 21.3 Gary Lien is liable for contribution and/or indemnity
27 to defendants in an amount to be proven at trial.
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31 BARNETTS' AMENDED ANSWER : 8
32 15004789.21

Evans, Craven & Luskie, P.S.
LAWYERS

400 E. COLUMBIA CENTER, 701 5th AVENUE
SEATTLE, WASHINGTON 98104

(206) 386-5555

1 WHEREFORE, having fully answered plaintiffs' complaint, and
2 having asserted affirmative defenses thereto, and having asserted
3 counterclaims thereto, defendants Barnett pray for relief as
4 follows:

5 1. That judgment be entered in favor of defendants against
6 plaintiffs and plaintiffs take nothing.

7 2. That plaintiffs' complaint be dismissed with prejudice.

8 3. That defendants be awarded contribution and/or
9 indemnification from plaintiff Kathy Lee Butler.

10 4. That defendants be awarded contribution and/or
11 indemnification from plaintiffs Sandi Lee and Lyle David Brown.

12 5. That defendants be awarded contribution and/or
13 indemnification from plaintiff Sandi Lee Brown.

14 6. That defendants be awarded judgment against plaintiffs
15 upon defendants' counterclaim for a frivolous action, for costs,
16 expenses and attorney's fees.

17 7. That defendants be awarded contribution and/or
18 indemnification from Christine Kathy Hall.

19 8. That defendants be awarded contribution and or
20 indemnification from all co-defendants.

21 9. That defendants be awarded judgment against third-party
22 defendant Gary Lien in an amount to be proven at trial.

23 10. For defendants' costs and reasonable attorney's fees
24 incurred in defending this action.

25 11. For such other and further relief as to the court seems
26 just and equitable.

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31 BARNETTS' AMENDED ANSWER : 9
15004789.21

Evans, Craven & Luckie, P.S.

LAWYERS

600 FLORENCE COLUMBIA CENTER, 200 5TH AVENUE
SEATTLE, WASHINGTON 98104

(206) 386-5555

DATED May 2, 1988.

EVANS CRAVEN & LACKIE, P.S.

By Rodney D. Hollenbeck
RODNEY D. HOLLENBECK
Attorneys for Defendants Barnett

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BARNETTS' AMENDED ANSWER : 10
15004789.21

Evans, Craven & Lackie, P.S.
LAWYERS

4TH FLOOR COLUMBIA CENTER 701 5th AVENUE
SEATTLE WASHINGTON 98104

(206) 386 5555

CIVIL TRACK 1

FILED
JUL 15 1988
SUPERIOR COURT CLERK
BY KATHIE COOK

CIVIL TRACK ONE
THE HONORABLE GARY LITTLE

SUPERIOR COURT OF WASHINGTON FOR KING COUNTY

KATHY LEE BUTLER, et. ux.,
et. al.,

Plaintiffs,

v.

DONALD LEE BARNETT, et. ux.,
et. al.,

Defendants.

CONSOLIDATED/TRACK ONE
NO. 86-2-18176-8

AMENDED
NOTE FOR CIVIL MOTION

(Clerk's Action Required)

SANDY EHRLICH, et. ux., et. al.,

Plaintiffs,

v.

RALPH ALSKOG, et. ux., et. al.,

Defendants.

MAUREEN P. JORGENSEN,

Plaintiff,

v.

COMMUNITY CHAPEL AND BIBLE
TRAINING CENTER, et. al.,

Defendants.

TO: THE CLERK OF COURT, and to all parties named below:

BARNETTS' ORDER TO
AMEND ANSWER -1
15004789.20

Evans, Craven & Luckie, P.S.
LAWYERS

34th FLOOR COLUMBIA CENTER, 1111 AVENUE
SEATTLE, WASHINGTON 98104

(206) 386-5555

74

1 PLEASE TAKE NOTICE that an issue of law in this case will be
2 heard on the date below and the Clerk is directed to note this
3 issue on the Civil Motion Calendar.

4 DATE OF HEARING: May 13, 1988

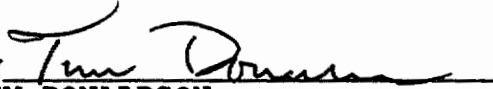
5 TIME OF HEARING: 2:15 p.m.

6 PLACE OF HEARING: Judge Little's Courtroom, King
7 County Courthouse

8 NATURE OF MOTION: Granting Defendants Barnetts Leave
9 to Amend Answer

10 DATED: May 3, 1988.

11 EVANS CRAVEN & LACKIE, P.S.
12 3410 Columbia Center
13 Seattle, WA 98104
14 386-5555

15 By 
16 TIM DONALDSON
17 Attorneys for Defendants Barnett

18 OTHER PARTIES REQUIRING NOTICE:

19 Jeff Campiche
20 Kargianis & Austin
21 4700 Columbia Center
22 701 Fifth Avenue
23 Seattle, WA 98104
24
25
26
27
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29

30 BARNETTS' ORDER TO
31 AMEND ANSWER -2
32 15004789.20

Evans, Craven & Lackie, P.S.
LAWYERS

3RD FLOOR COLUMBIA CENTER, 701 5TH AVENUE
SEATTLE, WASHINGTON 98104

(206) 386-5555

[REDACTED]

CIVIL TRACK 1

MAY 6 1988
ALPHEA COURT CLERK
BY ROBIN COOK
DEPUTY

CIVIL TRACK I

The Honorable Gary M. Little

Kathleen M. Reed

5 IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON
6 IN AND FOR THE COUNTY OF KING

7 KATHY LEE BUTLER et vir.,)
8 et al.,)

NO. 86-2-18176-8

9 Plaintiffs,)

ANSWER OF DEFENDANTS RALPH
AND ROSEMARY ALSKOG TO
PLAINTIFF'S FIRST AMENDED
COMPLAINT FOR PERSONAL
INJURIES AND DAMAGES

10 vs.)

11 DONALD LEE BARNETT et ux,)
12 et al.,)

13 Defendants.)

14 SANDY EHRLICH and MICHAEL EHRLICH,)
15 wife and husband; LARRY LEMKE,)
16 parent; LARRY LEMKE, Guardian ad)
17 Litem on behalf of SYBIL N. LEMKE,)
18 a minor; DEE CHABOT, parent;)
19 Guardian ad Litem on behalf of)
20 SHAWNA MICHAEL CHABOT, MICHAEL)
21 GRANT CHABOT, NICHOLAS STERLING)
22 CHABOT, minors; CATHERINE KITCHELL)
23 and RONALD KITCHELL, wife and)
24 husband; CATHERINE KITCHELL,)
25 Guardian ad Litem on behalf of)
26 WENDY KITCHELL, a minor,)

Plaintiffs,)

vs.)

23 RALPH ALSKOG and ROSEMARY ALSKOG,)
24 husband and wife; ROBERT HOWERTON)
25 and JANE DOE HOWERTON, husband)
26 and wife; DONALD LEE BARNETT and)
BARBARA BARNETT, husband and wife;)

ORIGINAL

75

1 COMMUNITY CHAPEL AND BIBLE)
2 TRAINING CENTER, a Washington)
3 corporation; "JOHN DOES" 1-4 and)
4 "JANE DOES" 1-4, husbands and)
5 wives; FIRST DOE CORPORATION; and)
6 FIRST DOE PARTNERSHIP,)
7 Defendants.)
8)
9)

10 COMES NOW the defendants, RALPH and ROSEMARY ALSKOG, by and
11 through their attorneys of record, and answer Plaintiff's First
12 Amended Complaint as follows:

13 I.

14 Answering Paragraphs 1.1 through 1.7 of Plaintiff's First
15 Amended Complaint, these defendants admit that Sandy Ehrlich and
16 Michael Ehrlich were at all times material hereto residents of King
17 County, Washington, but further answering said paragraphs, these
18 defendants deny each and every other allegation contained therein.

19 II.

20 Answering Paragraphs 2.1 through 2.5 of Plaintiff's First
21 Amended Complaint, these defendants admit Paragraphs 2.1, 2.2 and
22 2.3, but further answering said paragraphs, deny each and every
23 other allegation contained therein.

24 III.

25 Answering Paragraphs 3.1 through 7.1 of Plaintiff's First
26 Amended Complaint, the allegations contained therein are not
directed against these defendants but if answer thereto is re-
quired, these defendants do not have sufficient information to form
a belief as to the truth or falsity of the allegations contained

1 therein, and therefore deny the same.

2 IV.

3 Answering Paragraph 8.1 of Plaintiff's First Amended Complaint,
4 these defendants admit this court has jurisdiction over these
5 defendants, but further answering said paragraph, these defendants
6 deny each and every other allegation contained therein.

7 V.

8 Answering Paragraphs 9.1 and 9.2 of Plaintiff's First Amended
9 Complaint, these defendants admit that all contact between plain-
10 tiffs Michael Ehrlich and Sandy Ehrlich and defendants Ralph Alskog
11 and Rosemary Alskog occurred in conjunction with their activities
12 at Community Chapel Bible and Training Center, but further answer-
13 ing said paragraphs, these defendants deny each and every other
14 allegation contained therein.

15 VI.

16 Answering Paragraphs 10.1 through 10.4 of Plaintiff's First
17 Amended Complaint, these defendants admit that as members of
18 Community Chapel Bible and Training Center they were involved in
19 "spiritual connections", but further answering said paragraphs,
20 these defendants deny each and every other allegation contained
21 therein.

22 VII.

23 Answering Paragraphs 11.1 through 11.8 of Plaintiff's First
24 Amended Complaint, these defendants admit that they were all mem-
25 bers of Community Chapel Bible and Training Center and were in-
26

1 volved in spiritual connections, but further answering said para-
2 graphs, these defendants deny each and every other allegation con-
3 tained therein.

4 VIII.

5 Answering Paragraphs 12.1 through 14.8 of Plaintiff's First
6 Amended Complaint, the same are not directed at these defendants,
7 but if answer thereto is required, these defendants do not have
8 sufficient information to form a belief as to the truth or falsity
9 to the allegations contained therein and therefore deny the same.

10 IX.

11 Answering Paragraphs 15.1 through 26.2 of Plaintiff's First
12 Amended Complaint, insofar as said allegations may be directed at
13 these defendants, these defendants deny each and every allegation
14 contained therein, insofar as said allegations may be directed at
15 others, these defendants do not have sufficient information to form
16 a belief as to the truth or falsity to the allegations contained
17 therein, and therefore deny the same.

18 BY WAY OF FURTHER ANSWER AND AS AN AFFIRMATIVE DEFENSE THESE
19 DEFENDANTS STATE:

20 That if plaintiffs and or either of them have sustained any
21 injury or damage as alleged in plaintiff's complaint the same was
22 proximately caused, or contributed to, by the intentional reckless
23 and/or negligent acts of said plaintiffs or that the intentional
24 reckless and/or negligent acts of said plaintiffs proximately
25 caused or contributed to the injuries and damage, if any, allegedly
26

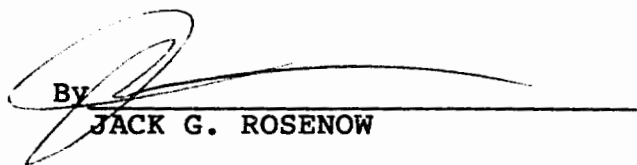
1 sustained by plaintiffs herein, and that for purposes of pleading
2 herein these defendants state such percentage of culpability on the
3 part of the plaintiffs to be 100%.

4 These defendants reserve the right to amend their answer hereto
5 and to assert such affirmative defenses, crossclaims, counter-
6 claims, and third-party complaints as during the course of discov-
7 ery herein may become reasonable and prudent.

8 WHEREFORE having fully answered plaintiff's complaint, these
9 defendants pray the same be dismissed with prejudice, that said
10 plaintiffs take nothing thereby, that these defendants recover
11 their costs and disbursements necessarily incurred herein and for
12 such other and further relief as the court deems just and equitable
13 in the premises.

14 DATED this 5th day of May, 1988.

15 ROSENOW, HALE & JOHNSON

16
17 By 
18 JACK G. ROSENOW

19 Attorney of record for
20 Defendants Alskogs

21
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26 1316G

CIVIL TRACK 1

GARY M. LITTLE

FILED
KING COUNTY, WASHINGTON

MAY 13 1988

CIVIL TRACK ONE
THE HONORABLE GARY LITTLE

SUPERIOR COURT OF WASHINGTON FOR KING COUNTY

KATHY LEE BUTLER, et. ux.,
et. al.,)

Plaintiffs,)

v.)

DONALD LEE BARNETT, et. ux.,
et. al.,)

Defendants,)

Third Party Plaintiffs,)

v.)

GARY LIEN,)

Third Party Defendant.)

SANDY EHRLICH, et. ux., et. al.,)

Plaintiffs,)

v.)

RALPH ALSKOG, et. ux., et. al.,)

Defendants.)

MAUREEN P. JORGENSEN,)

Plaintiff,)

v.)

COMMUNITY CHAPEL AND BIBLE
TRAINING CENTER, et. al.,)

Defendants.)

BARNETTS' AMENDED ANSWER : 1
15004789.21

CONSOLIDATED/TRACK ONE
NO. 86-2-18176-8

DEFENDANT BARNETTS' AMENDED
ANSWER, AFFIRMATIVE DEFENSES
COUNTERCLAIMS, CROSS-CLAIMS
AND THIRD PARTY COMPLAINT AS
TO THE BUTLER, ET. AL.,
COMPLAINT

Evans, Craven & Luckie, P.S.

LAWYERS

34th FLOOR COLUMBIA CENTER 701 5th AVENUE
SEATTLE WASHINGTON 98104

(206) 386-5555

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I. ANSWER

1.1 Answering paragraphs 1, 3(E)(F)(H)(I)(J)(M)(N)(O)(P)(R)(S)(T)(U)(V)(W)(X)(Y)(Z)(AA)(BB)(CC) defendants deny same.

1.2 Answering paragraph 2(A)(B)(C)(D)(E), 3(D), defendants have insufficient knowledge to form a belief and therefore deny same.

1.3 Answering paragraph 3(A), defendants allege at all times material hereto, defendants Donald Lee Barnett and Barbara Barnett were husband and wife residing in King County, and Donald Lee Barnett was pastor of the Community Chapel Bible and Training Center. Insofar as paragraph 3(A) contains other and further factual allegations, defendants deny same.

1.4 Answering paragraph 3(B), defendants allege at all times material hereto, Donald Lee Barnett and Barbara Barnett were principals, agents, employees or representatives of Community Chapel Bible and Training Center acting within the scope of their representation, employment or agency. Insofar as paragraph 3(B) contains other and further factual allegations, defendants deny same.

1.5 Answering paragraphs 3(C), defendants admit same.

1.6 Answering paragraph 3(G), defendants allege that Donald Barnett was a pastor at Community Chapel and Bible Training Center at all times material hereto, and that he did perform counseling. Insofar as paragraph 3(G) contains other and further factual allegations, defendants deny same.

1.7 Answering paragraph 3(K), defendants admit Sandi Lee and Lyle David Brown are the parents of Tara Lynn and Troy Steven

BARNETTS' AMENDED ANSWER : 2
15004789.21

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SEATTLE WASHINGTON 98104

(206) 386 5555

1 Brown. Insofar as paragraph 3(K) contains other and further
2 factual allegations, defendants deny same.

3 1.8 Answering paragraph 3(L), defendants admit Kathy Lee
4 Butler is the mother of Scott William and Randy William Lien.
5 Insofar as paragraph 3(L) contains other and further factual
6 allegations, defendants deny same.

7 1.9 Answering paragraph 3(Q), defendants allege that Donald
8 Barnett did preach his sincere religious belief in spiritual
9 connections. Insofar as paragraph 3(Q) contains other and
10 further factual allegations, defendants deny same.

11 **II. FIRST CAUSE OF ACTION**

12 2.1 Answering paragraph A, defendants reallege each and
13 every answer previously set forth in this answer as though fully
14 set forth herein.

15 2.2 Answering paragraph B, defendants deny same.

16 **III. SECOND CAUSE OF ACTION**

17 3.1 Answering paragraph A, defendants reallege each and
18 every answer previously set forth in this answer as though fully
19 set forth herein.

20 3.2 Answering paragraph B, C, D, E and F, defendants deny
21 same.

22 **IV. THIRD CAUSE OF ACTION**

23 4.1 Answering paragraph A, defendants reallege each and
24 every answer previously set forth in this answer as though fully
25 set forth herein.

26 4.2 Answering paragraphs B and C, defendants deny same.

27 **V. FOURTH CAUSE OF ACTION**

28 5.1 Answering paragraph A, defendants reallege each and
29 every answer previously set forth in this answer as though fully
30 set forth herein.

31 BARNETTS' AMENDED ANSWER : 3
32 15004789.21

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SEATTLE WASHINGTON 98104

(206) 386-5555

1 5.2 Answering paragraph B, defendants deny same.
2

3 **VI. FIFTH CAUSE OF ACTION**

4 6.1 Answering paragraph A, defendants reallege each and
5 every answer previously set forth in this answer as though fully
6 set forth herein.

7 6.2 Answering paragraph B, C, D, E, and F, defendants deny
8 same.

9 **VII. SIXTH CAUSE OF ACTION**

10 7.1 Answering paragraph A, defendants reallege each and
11 every answer previously set forth in this answer as though fully
12 set forth herein.

13 7.2 Answering paragraphs B, C and D, defendants deny same.

14 **VIII. SEVENTH CAUSE OF ACTION**

15 8.1 Answering paragraph A, defendants reallege each and
16 every answer previously set forth in this answer as though fully
17 set forth herein.

18 8.2 Answering paragraphs B, C, and E, defendants are
19 without sufficient information to form a belief and therefore
20 deny same.

21 8.3 Answering paragraph D, defendants allege that Donald
22 and Barbara Barnett were acting within the scope of their
23 employment or agency with the Community Chapel and Bible Training
24 Center at all times material hereto. Insofar as paragraph D
25 contains other and further factual allegations, these defendants
26 are without sufficient information to form a belief and therefore
27 deny same.
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31 **BARNETTS' AMENDED ANSWER : 4**
32 **15004789.21**

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SEATTLE WASHINGTON 98104

(206) 386-5555

IX. EIGHTH CAUSE OF ACTION

1
2 9.1 Answering paragraph A, defendants reallege each and
3 every answer previously set forth in this answer as though fully
4 set forth herein.

5 9.2 Answering paragraphs B, C, D and E, defendants deny
6 same.

7 X. NINTH CAUSE OF ACTION

8 10.1 Answering paragraph A, defendants reallege each and
9 every answer previously set forth in this answer as though fully
10 set forth herein.

11 10.2 Answering paragraph B, defendants deny same.

12 XI. TENTH CAUSE OF ACTION

13 11.1 Answering paragraph A, defendants reallege each and
14 every answer previously set forth in this answer as though fully
15 set forth herein.

16 11.2 Answering paragraph B, defendants deny same.

17 XII. ELEVENTH CAUSE OF ACTION

18 12.1 Answering paragraph A, defendants reallege each and
19 every answer previously set forth in this answer as though fully
20 set forth herein.

21 12.2 Answering paragraphs B, C and D, defendants deny same.

22 XIII. TWELFTH CAUSE OF ACTION

23 13.1 Answering paragraphs A, B, C, D and E defendants deny
24 same.

25 FOR FURTHER ANSWER and by way of affirmative defenses,
26 defendants allege as follows:
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30 BARNETTS' AMENDED ANSWER : 5
31 15004789.21
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LAWYERS

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SEATTLE, WASHINGTON 98104

(206) 386-5555

XIV. AFFIRMATIVE DEFENSES

14.1 This court lacks subject matter jurisdiction.

14.2 Plaintiffs have failed to state a claim upon which relief can be granted.

14.3 Plaintiffs' damages, if any, were caused by their own contributory fault.

14.4 Plaintiffs have failed to mitigate their damages, if any.

14.5 Defendants' actions and beliefs are privileged under section 5 and section 11 of Article 1 of the Constitution of the State of Washington; amendment 4, and amendment 34 of the Constitution of the State of Washington; amendment 1 to the Constitution of the United States of America; and amendment 14 to the Constitution to the United States of America.

14.6 Defendants are immune from liability through corporate entities.

14.7 Plaintiffs assumed the risk of their damages, if any.

14.8 Plaintiffs' damages, if any were caused by persons over whom defendants had no control.

14.9 Plaintiffs' claims are barred by applicable statutes of limitation.

14.10 Plaintiffs' claims are barred by laches.

14.11 Plaintiffs' claims are barred by estoppel and/or waiver.

14.12 All statements made, if any, were privileged, true and without fault.

BARNETTS' AMENDED ANSWER : 6
15004789.21

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SEATTLE, WASHINGTON 98104

(206) 306-5500

1 FOR FURTHER ANSWER and by way of counterclaim, defendants
2 allege as follows:

3 **XV. COUNTERCLAIM AGAINST KATHY LEE BUTLER**

4 15.1 At all times material hereto, Kathy Butler was mother
5 of Scott Lien and Randy Lien.

6 15.2 Damages to Scott Lien and Randy Lien, if any, were
7 caused by the fault of Kathy Lee Butler.

8 15.3 Kathy Lee Butler is liable for contribution and/or
9 indemnity to defendants in an amount to be proven at trial.

10 **XVI. COUNTERCLAIM AGAINST SANDI LEE BROWN AND LYLE DAVID BROWN**

11 16.1 At all times material hereto, Sandi Lee Brown and Lyle
12 David Brown were parents of Tara Lynn and Troy Steven Brown.

13 16.2 Damages to Tara Lynn and Troy Steven Brown, if any,
14 were caused by the fault of Sandi Lee Brown and Lyle David Brown.

15 16.3 Sandi Lee Brown and Lyle David Brown are liable for
16 contribution and/or indemnity to defendants in an amount to be
17 proven at trial.

18 **XVII. COUNTERCLAIM AGAINST SANDI LEE BROWN**

19 17.1 At all times material hereto, Sandi Lee Brown was the
20 wife of Lyle David Brown.

21 17.2 Damages to Lyle David Brown, if any, were caused by the
22 fault of Sandi Lee Brown.

23 17.3 Sandi Lee Brown is liable for contribution and/or
24 indemnification to defendants in an amount to be proven at trial.

25 **XVIII. COUNTERCLAIM AGAINST ALL PLAINTIFFS**

26 18.1 Plaintiffs' causes of action against these defendants
27 are frivolous and advanced without reasonable cause and
28 defendants are therefore entitled to reasonable expenses,
29 including attorney's fees incurred in defending this action
30 pursuant to RCW 4.84.185.

31 BARNETTS' AMENDED ANSWER : 7
32 15004789.21

Evans, Craven & Luckie, P.S.
LAWYERS

4000 100 AVENUE
SEATTLE WASHINGTON 98104
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XIX. COUNTERCLAIM AGAINST CHRISTINE KATHY HALL

19.1 At all times material hereto, Christine Kathy Hall was the wife of Donald T. Hall.

19.2 Damages to Donald T. Hall, if any, were caused by the fault of Christine Kathy Hall.

19.3 Christine Kathy Hall is liable for contribution and/or indemnification to defendants in an amount to be proven at trial.

FOR FURTHER ANSWER and by way of cross-claim, defendants Barnett allege as follows:

XX. CROSS-CLAIM

20.1 Plaintiffs' damages, if any, were caused by co-defendants herein, and defendants are entitled to contribution and/or indemnity.

20.2 At all times material hereto, Donald Lee Barnett and Barbara Barnett were acting within the scope of their employment and/or agency of the Community Chapel and Bible Training Center and the Barnetts are entitled to indemnification for their liability, if any, upon claims of plaintiffs.

FOR FURTHER ANSWER, and by way of third-party complaint, defendants allege as follows:

XXI. THIRD-PARTY COMPLAINT AGAINST GARY LIEN

21.1 At all times material hereto, Gary Lien was the father of Scott and Randy Lien, residing in King County.

21.2 Damages to Scott Lien and Randy Lien, if any, were caused by the fault of Gary Lien.

21.3 Gary Lien is liable for contribution and/or indemnity to defendants in an amount to be proven at trial.

BARNETTS' AMENDED ANSWER : 8
15004789.21

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LAWYERS

3RD FLOOR COLUMBIA CENTER 301 5TH AVENUE
SEATTLE WASHINGTON 98104

(206) 386-5555

1 WHEREFORE, having fully answered plaintiffs' complaint, and
2 having asserted affirmative defenses thereto, and having asserted
3 counterclaims thereto, defendants Barnett pray for relief as
4 follows:

5 1. That judgment be entered in favor of defendants against
6 plaintiffs and plaintiffs take nothing.

7 2. That plaintiffs' complaint be dismissed with prejudice.

8 3. That defendants be awarded contribution and/or
9 indemnification from plaintiff Kathy Lee Butler.

10 4. That defendants be awarded contribution and/or
11 indemnification from plaintiffs Sandi Lee and Lyle David Brown.

12 5. That defendants be awarded contribution and/or
13 indemnification from plaintiff Sandi Lee Brown.

14 6. That defendants be awarded judgment against plaintiffs
15 upon defendants' counterclaim for a frivolous action, for costs,
16 expenses and attorney's fees.

17 7. That defendants be awarded contribution and/or
18 indemnification from Christine Kathy Hall.

19 8. That defendants be awarded contribution and or
20 indemnification from all co-defendants.

21 9. That defendants be awarded judgment against third-party
22 defendant Gary Lien in an amount to be proven at trial.

23 10. For defendants' costs and reasonable attorney's fees
24 incurred in defending this action.

25 11. For such other and further relief as to the court seems
26 just and equitable.

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30 BARNETTS' AMENDED ANSWER : 9
31 15004789.21
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Evans, Craven & Luckie, P.S.

LAWYERS

34th FLOOR COLUMBIA CENTER, 701 5th AVENUE
SEATTLE WASHINGTON 98104

(206) 386-5555

DATED May 13, 1988.

EVANS CRAVEN & LACKIE, P.S.

By Rodney D. Hollenbeck
RODNEY D. HOLLENBECK
Attorneys for Defendants Barnett

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BARNETTS' AMENDED ANSWER : 10
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LAWYERS

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SEATTLE WASHINGTON 98104

(206) 386-5555

CIVIL TRACK 1
GARY M. LITTLE

FILED
MAY 13 1988
CLERK OF SUPERIOR COURT
BY JOSEPH COOK
DEPUTY

CIVIL TRACK ONE
THE HONORABLE GARY LITTLE

SUPERIOR COURT OF WASHINGTON FOR KING COUNTY

KATHY LEE BUTLER, et. ux.,)
et. al.,)

Plaintiffs,)

v.)

DONALD LEE BARNETT, et. ux.,)
et. al.,)

Defendants.)

CONSOLIDATED/TRACK ONE
NO. 86-2-18176-8

ORDER GRANTING LEAVE TO AMEND
ANSWER OF DEFENDANTS BARNETT

SANDY EHRLICH, et. ux., et. al.,)

Plaintiffs,)

v.)

RALPH ALSKOG, et. ux., et. al.,)

Defendants.)

MAUREEN P. JORGENSEN,)

Plaintiff,)

v.)

COMMUNITY CHAPEL AND BIBLE
TRAINING CENTER, et. al.,)

Defendants.)

I. HEARING

1.1 Hearing Date. May 13, 1988.

BARNETTS' ORDER TO
AMEND ANSWER -1
15004789.20

Evans, Craven & Luckie, P.A.
LAWYERS

400 FLOOR COLUMBIA CENTER, 701 5th AVENUE
SEATTLE WASHINGTON 98104

(206) 386-5555

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20 MAY 18 PM 2:47
KING COUNTY
SUPERIOR COURT

CIVIL TRACK 1
GARY M. LITTLE

FILED
KING COUNTY WASHINGTON
MAY 18 1988
CLERK

CIVIL TRACK ONE
THE HONORABLE GARY LITTLE

SUPERIOR COURT OF WASHINGTON FOR KING COUNTY

KATHY LEE BUTLER, et. ux.,
et. al.,

Plaintiffs,

v.

DONALD LEE BARNETT, et. ux.,
et. al.,

Defendants.

CONSOLIDATED/TRACK ONE
NO. 86-2-18176-8

AMENDED
ANSWER OF DEFENDANTS
BARNETT TO PLAINTIFF
JORGENSEN'S AMENDED
COMPLAINT

SANDY EHRLICH, et. ux., et. al.,

Plaintiffs,

v.

RALPH ALSKOG, et. ux., et. al.,

Defendants.

MAUREEN P. JORGENSEN,

Plaintiff,

v.

COMMUNITY CHAPEL AND BIBLE
TRAINING CENTER, et. al.,

Defendants.

I. ANSWER

1.1 Answering paragraph 2 defendants Barnett admit same.

AMENDED ANSWER OF BARNETTS TO
JORGENSEN'S AMENDED COMPLAINT : 1
15004881.21

Evans, Craven & Luckie, P.S.C.
LAWYERS

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SEATTLE WASHINGTON 98104
(206) 386-5555

1 1.2 Answering paragraphs 1 and 6, defendants Barnett deny
2 same as they are without knowledge as to the allegations
3 contained therein.

4 1.3 Answering paragraphs 3, 7, 8, 9, 13, 14, 15, 17, 20,
5 21, 22, 23, 25, 27, 28, 29 and 30, defendants Barnett deny same.

6 1.4 Answering paragraph 4, at all times material hereto,
7 defendants Donald Lee Barnett and Barbara Barnett were husband
8 and wife residing in King County, and Donald Lee Barnett was
9 pastor of the Community Chapel Bible and Training Center.
10 Insofar as paragraph 4 contains other and further factual
11 allegations, defendants deny same.

12 1.5 Answering paragraph 5, at all times material hereto,
13 Donald Lee Barnett and Barbara Barnett were principals, agents,
14 employees or representatives of Community Chapel Bible and
15 Training Center acting within the scope of their representation,
16 employment or agency. Insofar as paragraph 5 contains other and
17 further factual allegations, defendants deny same.

18 1.6 Answering paragraph 10, defendants Barnett admit
19 plaintiff bestowed a gift to Community Chapel and Bible Training
20 Center in the amount of \$480,000.00. Insofar as paragraph 10
21 contains other and further factual allegations, defendants deny
22 same.

23 1.7 Answering paragraph 11, defendants Barnett admit that
24 on December 1, 1975 plaintiff made a gift to the Community Chapel
25 and Bible Training Center in the amount of \$480,000.00. Insofar
26 as paragraph 11 contains other and further factual allegations,
27 defendants deny same.

28 1.8 Answering paragraph 12, the note provides in pertinent
29 part:

30 AMENDED ANSWER OF BARNETTS TO
31 JORGENSEN'S AMENDED COMPLAINT : 2
32 15004881.21

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LAWYERS

400 SECOND COMMERCE CENTER, 301 3RD AVENUE
SEATTLE, WASHINGTON 98104

(206) 386-5555

1 This note is secured by a mortgage of even date on real
2 property owned by maker.

3 Defendants admit that no mortgage was given. Insofar as
4 paragraph 12 contains other and further factual allegations,
5 defendants deny same.

6 1.9 Answering paragraph 16, defendants Barnett admit
7 Community Chapel and Bible Training Center did not pay
8 plaintiff's personal medical bills. Insofar as paragraph 16
9 contains other and further factual allegations, defendants deny
10 same.

11 1.10 Answering paragraph 18, defendants Barnett admit
12 plaintiff severed her ties with Community Chapel and Bible
13 Training Center in December of 1985, and that Donald Barnett
14 began to preach his sincere religious belief in the doctrine of
15 spiritual connections in 1985. Insofar as paragraph 18 contains
16 other and further factual allegations, defendants deny same.

17 1.11 Defendants Barnett reallege each and every paragraph
18 of this answer as though fully set forth herein, in response to
19 paragraphs 19, 24 and 26 of plaintiff's amended complaint.
20 Insofar as paragraphs 19, 24 and 26 require further response,
21 defendants deny the same.

22 FOR FURTHER ANSWER and by way of affirmative defenses,
23 defendants allege as follows:

24 II. AFFIRMATIVE DEFENSES

25 2.1 At the insistence of plaintiff, all amounts given to
26 the Community Chapel and Bible Training Center were gifts.

27 2.2 This court lacks subject matter jurisdiction.

28 2.3 Plaintiff has failed to state a claim upon which relief
29 can be granted.

30 AMENDED ANSWER OF BARNETTS TO
31 JORGENSEN'S AMENDED COMPLAINT : 3
32 15004881.21

Evans, Craven & Luckie, P. S.

LAWYERS

400 FLOOR COLUMBIA CENTER 701 5TH AVENUE
SEATTLE WASHINGTON 98104

(206) 386-5555

1 2.4 Plaintiff's damages, if any, were caused by her own
2 contributory fault.

3 2.5 Plaintiff has failed to mitigate her damages, if any.

4 2.6 Defendants' actions and beliefs are privileged under
5 section 5 and section 11 of Article 1 of the Constitution of the
6 State of Washington; amendment 4, and amendment 34 of the
7 Constitution of the State of Washington; amendment 1 to the
8 Constitution of the United States of America; and amendment 14 to
9 the Constitution to the United States of America.

10 2.7 Defendants are immune from liability through corporate
11 entities.

12 2.8 Plaintiff assumed the risk of her damages, if any.

13 2.9 Plaintiff's damages, if any were caused by persons over
14 whom defendants had no control.

15 2.10 Plaintiff's claims are barred by payment.

16 2.11 Plaintiff's claims are barred by failure of
17 consideration.

18 2.12 Plaintiff's claims are barred by applicable statutes
19 of limitation.

20 2.13 Plaintiff's claims are barred by laches.

21 2.14 Plaintiff's claims are barred by collateral estoppel
22 and/or res judicata.

23 2.15 Plaintiff's claims are barred by estoppel and/or
24 waiver.

25 2.16 All statements, if any, made by Donald Barnett were
26 privileged and true.

27 2.17 Plaintiff has failed to join necessary parties under
28 CR19.

29
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31 AMENDED ANSWER OF BARNETTS TO
32 JORGENSEN'S AMENDED COMPLAINT : 4
15004881.21

Evans, Craven & Lorkie, P.S.

LAWYERS

1400 FLOOR COLUMBIA CENTER 701 5TH AVENUE
SEATTLE, WASHINGTON 98104

(206) 386-5555

1 WHEREFORE, having fully answered plaintiff's complaint, and
2 having asserted affirmative defenses thereto, defendants Barnett
3 request relief as follows:

4 1. That judgment is entered in favor of defendants against
5 plaintiff, and plaintiff take nothing;

6 2. That plaintiff's complaint be dismissed with prejudice;

7 3. That defendants be awarded reasonable costs and
8 attorneys fees herein;

9 4. For such other and further relief that this court deems
10 just and equitable.

11 DATED this 17th day of May, 1988.

12
13 EVANS CRAVEN & LACKIE, P.S.

14
15 By Rodney D. Hollenbeck
16 RODNEY D. HOLLENBECK
17 Attorney for defendants Barnett
18
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30

31 AMENDED ANSWER OF BARNETTS TO
32 JORGENSEN'S AMENDED COMPLAINT : 5
15004881.21

Evans, Craven & Lackie, P.S.

LAWYERS

13th FLOOR COLUMBIA CENTER, 701 5th AVENUE
SEATTLE WASHINGTON 98104

(206) 386-5555

CIVIL TRACK 1



SUPERIOR COURT OF WASHINGTON
COUNTY OF

KATHY LEE BUTLER, et vir., et al.,
Plaintiffs,
v.
DONALD LEE BARNETT, et ux., et al.,
Defendants.

JUN 8 1988
BY RUBIN

NO. 86-2-18176-8 (Consolidated)

NOTE FOR MOTION CALENDAR
(Clerk's Action Required)

TO: THE CLERK OF THE COURT; and to all other parties per list on reverse side:

PLEASE TAKE NOTICE that an issue of law in this case will be heard on the date below and the Clerk is directed to note this issue on the appropriate calendar.

Calendar Date: June 24, 1988 Day of Week Friday
Nature of Motion: Motion for Order Requiring Identification of Witnesses by
Specific Case Name

DESIGNATED CALENDAR

- | | |
|--|--|
| <input type="checkbox"/> Civil Motion (LR 7) (9:30) | <u>FAMILY LAW MOTION [LR 94.04]</u> |
| <input type="checkbox"/> Summary Judgment (LR 56) (9:30) | <u>(W291)</u> |
| <input type="checkbox"/> Supplemental Proceeding (LR 69) (1:30) | |
| <input type="checkbox"/> Presiding Judge (Trial Date Motions Only) | <input type="checkbox"/> Domestic Motion (9:30) |
| (11:15 or 1:30 Daily) | <input type="checkbox"/> Sealed File Motion (1:30) |
| Time of Hearing: _____ | <input type="checkbox"/> Support Motion (1:30) |
| | <input type="checkbox"/> Modification (1:30) |

EX PARTE MOTION [LR 0.9(b)] (W285)
The following motions are heard 9:00-12:00 and
1:30-4:15:

- | | | |
|--|------------------------|--|
| <input type="checkbox"/> Adoption | Time of Hearing: _____ | <input type="checkbox"/> Receivership (LR 66) (2:00) |
| <input type="checkbox"/> Dissolution | Time of Hearing: _____ | <input type="checkbox"/> Sealed File Motion (9:30) |
| <input type="checkbox"/> Ex Parte Motion | Time of Hearing: _____ | |
| <input type="checkbox"/> Probate | Time of Hearing: _____ | |

DEPARTMENTAL HEARINGS [LR 40(b)]

Special Setting Before Judge/Commissioner:
Time of Hearing: 2:15 p.m. Room W 864

Typed Name: JACK G. ROSENOW

OF: ROSENOW, HALE & JOHNSON DATED: _____

Attorney for: Defendants ALSKOG

Telephone: (206) 473-0725

LIST NAMES, ADDRESSES AND TELEPHONE NUMBERS OF ALL PARTIES REQUIRING
NOTICE ON REVERSE SIDE.

ROSENOW, HALE & JOHNSON
Attorneys at Law
301 Tacoma Mall Office Bldg.
Tacoma, Washington 98409
(206) 473-0725

Handwritten initials

List Of Names, Addresses And Telephone Numbers Of All Parties Requiring Notice:

NAME: Richard H. Adler
ADLER, GIEPSCH & PEAD
Address: 1211 Smith Tower
Seattle, Washington

Telephone: 682-4267

Attorney For: Plaintiffs

NAME: John L. Messina
MESSINA DUFFY
Address: 200 Benj. Franklin Bldg.
4002 Tacoma Mall Blvd.
Tacoma, Washington

Telephone: 472-6000

Attorney For: Plaintiffs

NAME: Michael J. Bond
LEE, SMART, COOK, MARTIN & PATTERSON, P.S., INC.
Address: 800 Washington Buidling
1325 Fourth Avenue
Seattle, Washington

Telephone: 624-7990

Attorney for: Def. Community Chapel & Bible Training Center

NAME: Rod D. Hollenbeck
EVANS, CRAVEN & LACKIE
Address: 701 Fifth Avenue
Seattle, Washington

Telephone: 386-5555

Attorney For: Defs. Barnett

NAME: George Kargianis/Jeff Campiche
KARGIANIS, AUSTIN & ERICKSON
Address: Columbia Center, 47th Floor
701 Fifth Avenue
Seattle, Washington

Telephone: 624-5370

Attorney For: Plaintiffs Butler

List Of Names, Addresses And Telephone Numbers Of All Parties Requiring Notice:

NAME: Susan Delanty Jones
PRESTON, THORGRIMSON, ELLIS & HOLMAN
Address: 5400 Columbia Center
701 Fifth Avenue
Seattle, Washington
Telephone: 623-7580
Attorney For: Plaintiff Jorgensen

NAME: Robert P. Howerton
Address: 3507 South 40th Street
Tacoma, Washington

Telephone:
Attorney For: Pro Se (Ehrlich case)

NAME:

Address:

Telephone:

Attorney for:

NAME:

Address:

Telephone:

Attorney For:

NAME:

Address:

Telephone:

Attorney For:

CERTIFICATE

On this day I delivered a true and accurate copy of the document to which this certificate is affixed to LEGAL MESSENGERS, INC. for delivery to the attorneys of record of plaintiff/defendant.

I certify under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct.

DATED this 15th day of June, 1988 at Tacoma, Washington.

Mary Ann Torrone

NON-TRIAL

SCOMIS code:

PREHRG DISPHRG HEARING
 POSTHRG MINUTE

Department No. 19
Date: Monday, JUN 6 1988
Page 1 of 1

JUDGE: Hon. Mary M. Little
BAILIFF: Kevin Hickey
COURT CLERK: Robin L. Cook
REPORTER: Gary Crawford

consolidated

King County Cause No. 86-2-18176-8 | 86-2-18429-5 | 86-2-26360-8

Case Caption

Kathy Lee Butler, et vir, et al -vs- Donald Lee Barnett, et ux, et al

Litigants and attorneys

Plaintiffs represented by Counsel, Jill Campiche.
Defendant, Barnett, represented by Counsel, Rod Hallenbeck.
Defendant, Community Chapel and Bible Training Center, represented by Counsel, Michael Bond.

Minute Entry

Plaintiff's motion to depose witness Du Bois.

If Du Bois is to be used for privileged issues and as speaking agent, motion needs to be set for deposing of said witness.

Kx

tx

Kx

sub #

CERTIFICATE

On this day I delivered a true and accurate copy of the document to which this certificate is affixed to LEGAL MESSENGERS, INC. for delivery to the attorneys of record of plaintiff/defendant. CIVIL TRACK 1

I certify under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct. Honorable Gary Little Civil Track I
DATED this 15th day of June, 1988 at Tacoma, Washington.

Mary Ann Little

IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON
IN AND FOR THE COUNTY OF KING

KATHY LEE BUTLER, et vir., et al.,)
Plaintiffs,)
vs.)
DONALD LEE BARNETT, et ux., et al.,)
Defendants.)

NO. 86-2-18176-8
AFFIDAVIT OF JACK G. ROSENOW
IN SUPPORT OF MOTION FOR AN
ORDER TO IDENTIFY WITNESSES
BY SPECIFIC CASE NAME

SANDY EHRLICH, et vir., et al.,)
Plaintiffs,)
vs.)
RALPH ALSKOG, et ux., et al.,)
Defendants.)

STATE OF WASHINGTON)
County of Pierce) : ss.

I, JACK G. ROSENOW, being first duly sworn upon oath, depose and state:

That I am the attorney of record for the Defendants, RALPH and ROSEMARY ALSKOG, in the above-referenced matter, and make this Affidavit in support of said Defendants' Motion for an Order

Aff. of Jack G. Rosenow in
Supp. of Motion for an Order
to Identify Witnesses by
Specific Case Name -1-
mat(MWS:24, I.1/.3)

1 requiring that the parties designate their lay and expert witnesses
2 by listing them under the applicable case in which the witnesses
3 have knowledge or will testify.

4 There are over 10 Plaintiffs and four separate Defendants
5 in the above-referenced consolidated cases. Only Plaintiffs
6 EHRlich have filed an action against Defendants, ALSKOG, in this
7 multiple claim lawsuit.

8 Recently, the parties identified over 200 lay witnesses.
9 With one exception, the attorneys have lumped all witnesses
10 together without disclosing the witnesses pursuant to the
11 designated cases in which they have knowledge or in which they will
12 testify. (See, Exhibits "A" - "C," attached)

13 It would greatly simplify discovery and the coordination
14 of depositions, as well as save enormous cost of litigation, if all
15 witnesses were identified by the specific cases in which they have
16 factual knowledge and will testify, so that attorneys only need to
17 attend depositions of witnesses pertaining to the particular case

18 * * * * *

19 * * * * *

20 * * * * *

21 * * * *

22 * * *

23 * *

24 *

25 Aff. of Jack G. Rosenow in
26 Supp. of Motion for an Order
to Identify Witnesses by
Specific Case Name -2-
mat(MWS:24, I.1/.3)

1 in which their client is a party. For an example of how this could
2 be accomplished see Exhibit "D," attached.

3 FURTHER YOUR AFFIANT SAYETH NAUGHT.

4
5 

JACK G. ROSENOW

6 SUBSCRIBED AND SWORN to before me this 27th day of
7 May, 1988.

8 Marilyn W Schulichen
NOTARY PUBLIC in and for the State of
9 Washington, residing at: Auburn Wa

10 My Commission Expires: 10-1-88

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26

Aff. of Jack G. Rosenow in
Supp. of Motion for an Order
to Identify Witnesses by
Specific Case Name -3-
mat(MWS:24, I.1/.3)

LAW OFFICES OF
ADLER, GIERSCH AND READ, P.S.

1621 SMITH TOWER
SEATTLE, WA 98104

(206) 682-4267

RICHARD H. ADLER
E. PAUL GIERSCH
JOHANNA G. READ
JOY K. SMICKER
MICHAEL S. SPEARMAN

92

May 13, 1988

Susan Delanty Jones
Preston, Thorgrimson, Ellis
& Holman
5400 Columbia SeaFirst Center
Seattle, Washington 98104-7011

Michael Bond
Lee, Smart, Cook,
Martin & Patterson
800 Washington Bldg.
1325 Fourth Avenue
Seattle, Washington 98101

Rodney D. Hollenbeck
Evans, Craven & Lackie
34th Floor, Columbia Center
Seattle, Washington 98104

John Messina
Messina Duffy
4002 Tacoma Mall Blvd
Suite 200
Tacoma, Washington 98409

Jeff Campiche
Kargianis & Austin
47th Floor, Columbia Center
Seattle, Washington 98104

✓ Jack G. Rosenow
Rosenow, Hale & Johnson
Tacoma Mall Office Bldg.
Tacoma, Washington 98409

Re: Butler/Ehrlich/Jorgensen v. Community Chapel, et al.


Dear Counsel:

Per agreed order for Pre-Trial Discovery and agreed extension of one week, enclosed please find a list of Plaintiffs' Ehrlich, Chabot, Lemke, and Kitchell Lay Witness List. Plaintiffs reserve the right to amend this list, as additional witnesses become known.

We will provide additional contact information for witnesses listed without complete addresses/phone numbers as we obtain them.

Very truly yours,

ADLER, GIERSCH AND READ, P.S.


Margaret L. Ennis
Attorney at Law

MLE/jao/f

EXHIBIT
"A."

LIABILITY LAY WITNESSES

Ray Ellis
2211 S. 214th
Seattle, Washington 98148

Former high school
principal

Cal and Mary Freden
14105 - 12th SW
Seattle, Washington 98166
Phone No.: 244-1178

Former Elder and
members

David and Nancy Dobbs
25642 - 46th S.
Kent, Washington 98032
Phone No.: 854-8078

Former member,
counselor

Wayne Snoey
P.O. Box 98683
Seattle, Washington 98198
Phone No.: 878-1388

Former operations
manager

Charles Moren
1213 SW 174th
Seattle, Washington 98166

Witness re: Structure,
church, school and
public statements

Dan and Carol Pack
20220 8th Ave. S.
Seattle, Washington 98148

Former security
supervisor and asst.
operations manager

Dan Barnett
4700 - 173rd Ave. SE
Issaquah, Washington 98027
Phone No.: 644-9406

Mike Gunke
483-9531

Wife was member of
Community Chapel in
Kirkland

Barb Sorrels
19423 - 104th South
Seattle, Washington 98148
Phone No.: 824-3413

Secretary to Dan Pack

PLAINTIFFS, EHRLICH, LEMKE,
CHABOT, AND KITCHELL
LAY WITNESS LIST

Michael Sabourin
18727 - 4th Ave. S.
Seattle, Washington 98148
Phone No.: 246-3263

Former Elder, former
counselor

Jack Hicks
430 S. 188th
Seattle, Washington 98148

Senior Elder, Vice
president and general
manager

George and Diana Alberts
20417 - 10th S.
Seattle, Washington 98148
Phone No.: 878-5749

Former Elder, head
minister of counseling

Jerry Zwack
25327 - 3rd Place S.
Kent, Washington 98032

Former head of
counseling center

Jim Wagner
Seattle, Washington 98168

Bill Kamp
19505 - 2nd S.
Seattle, Washington 98148

Former Elder

Don Tuggle
2340 S. Hosmer
Tacoma, Washington 98405

Brian Grennan
22515 - 10th S., #A
Seattle, Washington 98188

Former member,
travel agent

Cheryl Riggs
12007 - 10th S.
Seattle, Washington 98168
Phone No: 243-7930

David Motherwell
15208 - 24th SW
Seattle, Washington 98166

Barnett's former
counselor

PLAINTIFFS, EHRLICH, LEMKE,
CHABOT, AND KITCHELL
LAY WITNESS LIST

Lanny Peterson
2452 SW 150th
Seattle, Washington 98166

Barnett's former
son-in-law

Jack Dubois
2459 SW 150th
Seattle, Washington 98166

Senior Elder

Scott Hartley
1208 S. 140th
Seattle, Washington 98168

Elder

A.R. MacKenzie
21912 - 18th Place S.
Seattle, Washington 98188

Elder

John Bergin
19750 - 26th S.
Seattle, Washington 98188

Minister

Chris Mathew
1220 SW 149th
Seattle, Washington 98166

Minister

Donald Lockrem
111 S. 192nd
Seattle, Washington 98148

Elder

John Harold
20237 - 6th S.
Seattle, Washington 98148

Elder

Gerald Slaminski
21012 Marine View Dr. SW
Seattle, Washington 98166

Elder

Gregory Thiel
20828 - 3rd S.
Seattle, Washington 98148

Elder

PLAINTIFFS, EHRLICH, LEMKE,
CHABOT, AND KITCHELL
LAY WITNESS LIST

Mark Yokers
426 S. 190th
Seattle, Washington 98148

Elder

Ronald Myrick
1104 S. 223rd
Des Moines, Washington 98188

Elder

George Bowker
1216 S. 237th, #2
Seattle, Washington 98188

Elder

DAMAGES LAY WITNESSES

Virginia McMannus
13048 - 3rd S.
Seattle, Washington 98168

Lucy Brown
10016 Waters Ave. S.
Seattle, Washington 98178

Gayle Peterson

Sheri O'Brien

Nancy Plueger
425 S. 188th
Seattle, Washington 98148

Detective Larry Daley
King County
516 3rd Ave.
Seattle, Washington 98104

Mark Grubbs
26303 - 42nd S.
Kent, Washington 98032

PLAINTIFFS, EHRLICH, LEMKE,
CHABOT, AND KITCHELL
LAY WITNESS LIST

Pede Grubbs
26303 - 42nd S.
Kent, Washington 98032

George Page
21816 - 24th Ave. S.
Des Moines, Washington
Phone No.: 878-4063

Jerry Yates, M.D.
2861 S. 128th St.
Seattle, Washington 98168

Heather Marth
2117 S. 285th St.
Federal Way, Washington 98003
Phone No.: 839-7487

Marvin Williams
424 S. 181st
Seattle, Washington
Phone No.: 246-3618

Reed David, Ph.D and
David Penner, Ph.D.
12844 Military Road S.
Seattle, Washington 98168
Phone No.: 248-4725

Celeste Berger
1406 - 5th Avenue N.W.
Mandan, North Dakota 58544

Tony and Debbie Tomaccio
19323 - 9th Avenue S.
Seattle, Washington 98148

Bruce and Stella Gould
25902 - 20th Avenue S.
Kent, Washington 98032

Pastor of the
Des Moines Assembly
of God

Sandy Ehrlich's
obstetrician

Sandra Ehrlich's
friend

Michael Ehrlich's
friend

Shawna M. Chabot's
psychologist; Sandra
and Michael Ehrlich's
psychologist

Assisted Sandra
Ehrlich with
household duties

Dee Chabot's friends

Dee Chabot's friends

PLAINTIFFS, EHRLICH, LEMKE,
CHABOT, AND KITCHELL
LAY WITNESS LIST

Sandy Riley
140 S.W. 208th
Seattle, Washington 98166

Dee Chabot's friends

Judy Prestella
1029 S. 262nd Place
Kent, Washington 98032

Dee Chabot's friends

Marc Ungar
King Co. Family Law CASA Program
W-321
King County Courthouse
Seattle, Washington 98104

Tom and Claudia Ryan
34629 - 46th Ave. S.
Auburn, Washington

Dee Chabot's friends

Ronald M. Enroth Ph.D.
955 La Paz Road
Santa Barbara, California 93108

PLAINTIFFS, EHRLICH, LEMKE,
CHABOT, AND KITCHELL
LAY WITNESS LIST

LAW OFFICES

KARGIANIS, AUSTIN & ERICKSON

RUSSEL A. AUSTIN, JR.*
JAMES F. BIAGI, JR.**
JULIE A. BROWN
JEFF CAMPICHE
KEVIN COLUCCIO
RONALD P. ERICKSON*
FAY ANNE FREEDMAN
JAMES E. GRAHAM
GEORGE KARGIANIS*, P.S.
SIM OSBORN
JACQUELINE L. TACHER
BRUCE A. WOLF

47TH FLOOR COLUMBIA CENTER
701 FIFTH AVENUE
SEATTLE, WASHINGTON 98104-7010

TELEPHONE
(206) 624-5370

TELECOPIER
(206) 624-8195

*WASHINGTON STATE AND
DISTRICT OF COLUMBIA BARS

**WASHINGTON STATE, IDAHO,
AND WISCONSIN BARS

ALL OTHERS WASHINGTON
STATE BAR ONLY

TELECOMMUNICATIONS DEVICE
FOR THE DEAF
(206) 623-7568

OF COUNSEL
PHILIP G. ARNOLD
CRAIG C. BELES
JAMES N. JORY, JR.
MARSHA L. MARTIN

May 9, 1988

Michael Bond, Esq.
Lee, Smart, et al.,
800 Washington Bldg.
Seattle, WA 98104

Rodney Hollenbeck, Esq.
Evans, Craven & Lackie, P.S.
3410 Columbia Center
Seattle, WA 98104

Richard Adler, Esq.
Adler, Giersch & Read, P.S.
16th Floor, Smith Tower
Seattle, WA 98104

John Messina, Esq.
Messina Duffy
4002 Tacoma Mall Blvd.
Suite 200, Benj. Franklin Bldg.
Tacoma, WA 98409

Jack Rosenow, Esq.
Rosenow, Hale & Johnson
1620 Key Tower
Seattle, WA 98104

Re: Lay Witnesses
Butler, et al., v. CCBTC, Barnett, et ux, et al.,

Gentlemen:

Below are our lay-witnesses to be disclosed by this date pursuant to the Court's Order. Note, that by said disclosure Plaintiffs hereby reserve the right to amend said list once discovery depositions get underway and additional witnesses become known.

EXHIBIT
"B"

RECEIVED

MAY 10 1988

ROSENOW, HALE
& JOHNSON

George & Diana Alberts
20417 - 10th Avenue South
Seattle, WA 98148

Former elders, members, friends

Dale & Davey Baker
P.O. Box 93
LaGrande, Oregon

Cousin to Lucy, friends of Browns
life-long friends of Lyle.

Shawna Baker
2445 South 22nd, No. F-202
Des Moines, WA 98198

Tara Brown friend

Daniel & Pam Barnett
20724 - N.E. 142nd
Woodinville, WA

Former members, friends

Barbara Barnett
current address unknown
presumably w/ Jerry Zwack

Member

Robert Bradley
134 Collier Lane
Kalispell, Montana 59901

Christine Hall's ex-husband
Ms. Hall's children are w/ him

Lynn & Luci Brown
3373 Naches Hill Road
Yakima, WA 98908

Lyle Brown's twin brother, Pastor
of Yakima church

Millie Brown
1811 - Jackson
LaGrande, Oregon 97850
503-963-5778

Lyle Brown's mother

Sandi Brown
address already supplied

Plaintiff, witness for K. Butler &
C. Hall

Michael Bugni
address unknown
Seattle, WA

Former member, public statements re:
church school & church

Kathy Butler
address already supplied

Plaintiff, witness for S. Brown & C.
Hall

Gavin Cassidy 22920 - 23rd Place South Des Moines, WA	Friend, Tara Brown
Dee Chabot address unknown Seattle, WA	Former member, friend
Donna Coleman 36123 - 62nd Ave. South Auburn, WA 98002	Former member, friend
David & Nancy Dobbs 25642 - 46th Ave. South Kent, WA 98032	Former elders, members & friends
Joe & Margo Espinosa and family Children No. 7 Ridgewood Drive Russelleville, ARK 72801	Lifelong friends of Sandi Brown's children grew up w/ Brown children
Craig Falconer address unknown Seattle, WA	Troy Brown friend
Lee & Dora Fellhasuer 110823 Marine View Drive S.W. Seattle, WA 98146	Sandi Brown's parents
Jane Fraser 220 Slerks, Apt. B Costa Mesa, CA 92627	Former member, friend
Cal & Mary Freden 14105 - 62nd Ave. S.W. Seattle, WA 98166	Former elder & members
Christine Hall P.O. Box 168 Big Foot, Montana 59911	Plaintiff, witness for Sandi Brown
Donald Hall P.O. Box 6664 Yorktown, VA 23690	Chris Hall's estranged husband
Scott & Bonnie Hartley 1208 South 140th Seattle, WA 98168	Elders

Counsel of Record Butler v. CCBTC
May 9, 1988
Page - 4

KARGIANIS, AUSTIN & ERICKSON

Vickie Holkrantz
address unknown
Seattle, WA

former member, victim of D. Barnett

Ron & Katy Kitchell
618 South 196th
Seattle, WA 98148

Former members

Ray & Sharon Kuhn
20231 14th Ave. S.
Seattle, WA

Troy Brown - counselor

Dr. Jackson
Successor to Dr. Rice
1229 Madison Street, Ste. 1250
Seattle, WA 98104

Sandi & Tara Brown physician

Dr. Lane
c/o Highline School District

Tested, counseled Troy Tyner

Dr. Diana Lardy, M.D.
1001 Broadway, Ste. 320
Seattle, WA

Physician, Tara Brown

Shannon Lemke
address unknown

witness, friend of Christine Hall

Gary & Donna Lien
4309 East Valley Highway
Sumner, WA 98390

Kathy's ex-husband, father of kids

Stacey Lund
address unknown
Seattle, WA

Friend, Troy Brown

Scott Lundberg
address unknown
Kirkland, WA

Chris Hall's brother, social worker

Dan'l & Kathy Markum
P.O. Box One
Ilwaco, WA 98624

Former pastor, member & friends

Tina Mattson
c/o 19719 - 10th South
Seattle, WA 98148

Friend, Tara Brown

Bill Mattson
address unknown
Seattle, WA

Friend, Troy Brown/Tyner

Counsel of Record Butler v. CCBTC
May 9, 1988
Page - 5

KARGIANIS, AUSTIN & ERICKSON

Cindy Maxwell
26115 - S.E. 424th
Enumclaw, WA 98022

former member, teacher, friend,
rebuked Barnett attempts

Ed & Carmen Merrett
6815 Phillips Road S.W.
Tacoma, WA 98498

Christine Hall's parents

Charles & Donna Moren
address unknown
Seattle, Washington

Witness re: structure, church
school & public stms re: same

Teachers & personnel
Mount Rainier High School
Federal Way, WA

Tara Brown's school

Cora Oleson
5423 Beach Drive S.W.
Seattle, WA 98116

Sandi's Brown's aunt

Marg Piprew
506 - South 188th
Seattle, WA 98
243-0340

Margo Espinosa's mother & friend

Carolyn Peterson
address unknown
Seattle, WA

Former member, friend

Physician who performed abortion on Kathy Butler
address unknown
Sea-Tac Airport area

(Note, Donald L. Barnett, referred Ms. Butler to same, made the appt.,
perhaps he will know the name of said physician)

Lisa Rasmussen
936 South 186th
Seattle, WA

Troy Tyner (f/k/a Brown) friend

Judy Raul
address unknown

former teacher Chapel School
of Scott Lien

Glenn Rice, physician
since retired, see above Dr. Jackson
address unknown

Sandi Brown's former physician

Frank & Marlene Rice
124 No. B-46th St.
Newport Beach, CA 92663

Former church members, friends

Mike & Lola Rurup
32812 64th Ave. east
Eatonville, WA 98328

former members, neighbors &
friends of Browns

Mike & Maureen Sabourin
18727 - 4th Ave. South
Seattle, WA 98148

Former elders, members & friends

Teaching Personnel at
Seattle Christian School
19639 - 285th Ave. South
Seattle, WA 98188

generally & Tara Brown & Troy Tyner

Don & Becky Seely
East 514 Walton
Spokane, WA 99207

check w/ Sandi, Lucie Brown's sister

Bob & Patsy Shaw
address unknown believed to be
Kirkland or Spokane, WA

Former members, friends,

Sam Shirley
address unknown but a King Co.
Police Officer
Seattle. WA

Friend, Troy Brown

Roy Siebold
21017 - 5th Avenue S.
Seattle, Washington

Former elder, members & friends

Lorna Smith
13705 - 56th South
Seattle, WA 98168

Friend, Tara Brown

Bobby & Harry Stegman
18802 - 8th Ave. S
Seattle, WA 98148

Former members, friends

Allen & Linda Steinhauer
819 South 194th
Seattle, WA 98148

Former members, friends

Ken Stiles
address unknown
Seattle, WA

Friend, Troy Brown

Counsel of Record
May 9, 1988
Page - 7

Butler v. CCBTC

KARGIANIS, AUSTIN & ERICKSON

John Swenson
1456 - 16th Ave. S.W.
Seattle, WA 98166

Witness for K. Butler

Teachers/Personnel
Totem Jr. High School

Re: Randy & Scott Lien

Personnel & Teachers
Tyee High School

Re: Troy Brown/Tyner

Steve Tyner
4004 - 58th Place S.W.
Seattle, WA

Troy Tyner's father, Sandi Brown's
ex-husband

Teachers/Personnel
Dar Springer, Principal
Valhalla Elementary School

Re: Randy & Scott Lien

Raymond E. Vath, MD
2661 Bel-Red Road, No. 105
Bellevue, WA

Psych.. Troy & Tara in 1984

Jim Wagner
address unknown

Former CCBTC tape librarian

David Wilkerson
address unknown

Evangelist who Plaintiffs gave
testimonies to

Marvin Williams
address unknown

Former Elder who K. Butler disclosed
incest background to

Carmen Woods
23417 - 16th Place S.
No. B-302
Des Moines, WA 98198

Tara Brown friend, co-worker

Witnesses/Elders
unknown at this time

Those witnesses & elders who were
present when Donald L. Barnett
"confessed or admitted" several of the
actions or like/similar actions in
1985, 86, 87 & 88

Mark Yokers
address unknown

Former Elder

Counsel of Record Re: Butler v. CCBTC
May 9, 1988
Page - 8

Tim & Salli Yokers
2445 Fifth Avenue So.
Seattle, WA 98168

KARGIANIS, AUSTIN & ERICKSON
Former members, friends

Jeff Yost
address unknown

Friend, Troy Brown/Tyner

Jerry Zwack
address unknown, but
presumed to be w/ Barbara Barnett

former counseling center head

Unknown Physicians/Treaters of
Donald & Barbara Barnett, if any

As we get more address information it will be supplied to you.

Sincerely yours,
KARGIANIS, AUSTIN & ERICKSON


JEFF CAMPICHE

cc: clients

LEE, SMART, COOK, MARTIN & PATTERSON, P.S., INC.

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GARY A. TRABOLSI
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SHERRY M. ROGERS
TIMOTHY R. WINSHIP
STEVEN G. WRAITH

JOSEPH J. GANZ
ROGER K. ANDERSON
GAIL M. LUNDGREN
AUGUST G. CIFELLI

May 10, 1988

RECEIVED
MAY 11 1988

Kargianis, Austin & Erickson

OF COUNSEL:
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FRED T. SMART

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& Holman
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Tacoma, WA 98409

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Kargianis & Austin
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Seattle, WA 98104

Jack G. Rosenow
Rosenow, Hale & Johnson
Tacoma Mall Office Building
Tacoma, WA 98409

Re: Butler/Ehrlich/Jorgensen v. Community Chapel, et al

Dear Counsel:

This letter is our preliminary attempt to comply with the court's order requiring the disclosure of the identity of lay witnesses with knowledge. I requested that my client advise me of the identity of all persons who may have knowledge of the spiritual connections teachings or the allegations made by the various plaintiffs in these cases. The names are on the attached pages 1 through 8.

If you have any questions, please give me a call.

Very truly yours,
Michael J. Bond
Michael J. Bond

MJB/yy

Enclosure

cc: Scott Hartley
Jack DuBois
Donald Lee Barnett
Mary Sullivan
(57-24103 S2)

EXHIBIT
"C."

16 MAY 1985
COMMUNITY COUNCIL'S 2000 BIRTHDAY CELEBRATIONS
COMMUNITY COUNCIL 1985

Ministers

Barrett, Harold	Ralph Alskog
Bergin, John	Roger Anderson
Berry, Tim	John Bergin
Bradley, Sandy	George Bowker
Bruker, George	Jack DuBois
Brown, Lynn	John Harold
Cay, Steve	Scott Hartley
Faylor, Earl	Jack Hicks
Gunn, Keith	David Motherwell
Hansen, Louis	George Alberts
Harold, John	Barbara Barnett
Kanleson, Keith	Don Barnett
Kann, Charles	Don Lockrem
Kaufman, Mark	Ron Lowrie
Kimber, Ron	Russell MacKenzie
Langford, Fred	Chris Mathews
Leche, Nicky	Ron Myrick
MacKenzie, A Russell	Dan O'Brien
Mathews, Chris	Lanny Peterson
McInroy, Jenny	Gerald Slaminski
McNaggon, Jeff	Greg Thiel
Mansonides, Louis	Larry Walkemeyer
Miller, Scott	Mark Yokers
Miller, Steve	Jerry Zwack
Motherwell, David	Michael Ehrlich
Ose, Michael	Kristian Erickson
O'Brien, Cheri	Earl Faylor
O'Brien, Dan	Cal Freden
Osven, Grant	Louis Mensonides
Peterson, Jerry	Michael Sabourin
Reese, Hal	
Rapp, Fred	
Schmidt, Michael	
Shaw, Bob	
Stewart, Young	
Stratton, Gahnie (CB presentation)	
Talbot, Greg	
Thompson, Earl	
Toggia, Bob	
Walters, Young	
Westlan, Mike	
Wright, Jerry (CB presentation)	
Yates, John	

Peggy Lybecker
Michael Teel
Beth Adamek
Sven Andersson
Carol Connell
Annie Heigh
Magnus Karlsson
Jay Nowlin
Deb Stark
Terry Taylor
Molly Wilson
Robin Bogard
Don Chin
Geoff Hastings
Craig Lasher
John Scharf
Brad Bond
Lisa Collado
Karlyn Freden
Andres Himiob
Rodney Kunnanz
Debbie Maines
Bill Miller
Dave Parton
David Ridgewell
Oral Taylor
Cathy Hardin
Shelly Tyree
Sharon Baker
Dawn Bowers
Dale Hansen
Nancy Kosek
Pamela Sloan
Terry Bechtel
Leslie Carr
Elvia Cromwell
Steve Duhamel
Steve Franklin
Rodger Lacy
Karen Millsap
Marsha Orser
Cindy Reynolds
Sharon Saner
Bob Tilse
Ron Vevoda
Jeannine Wozniak
Kurt Anderson
Ray Buckingham
Karma Embree
Danette Glasgo
Steve Graue
Gene Heinrickson
Mike Keller
Lynn Liukko
Brian Moore
Joe Roberts
Randy Sanford
Louis Villanueva
Sara Villanueva

Drake Pesce
Don Tuggle
Jim Adams
Liz Breed
Prescott Dempster
Larry Hicks
Jerry Koshak
James Peak
Craig Stewart
Thomas Whims
Ju Nam Yun
Kenny Brown
Alan Chisholm
Jerry Jackson
Ingrid Ohm
Keith M. Wilson
Cynthia Braun
Keith Davidson
Lewis Furber
Florence Holmes
Connie Lee
Steve Maxwell
Kristen Miller
Karla Prevette
Linda Roberts
Karen Wahl
Lilli Hauser
Charles Wheeler
Steve Baker
Paul Coblentz
Reid Herron
Scott Miller
Max Hossmann
Ron Briggs
Jerry Chase
Mike Denny
David Dye
Joan Gurr
Tim Lotz
Terry Millsap
Marty Padilla
Tammy Roberts
Jeannie Severyns
Daryl Upton
Bob White
Leigh Ewbank
Ellen Biallis
Jana Canary
Ken Fenton
John Glasgo
James Green
Shelbey Herron
Moira Landgraf
Mike McClure
Cathy Moore
Linda Roberts
Kathy Schouten
Andy Vouros
Sara Villanueva

Jack Shelton
Bob Weisse
Debbie Beier
Rusty Breed
Brendalea Emde
Sharrie Hicks
Velma Lepaska
Pam Perry
Terry Stickney
Colin Williamson
Kathrin Zwahlen
Jane Brunt
Keith Fontaine
Lawrence Jones
Ryan Robinson
Angie Abele
Richard Brauhn
Patrick Davies
Mike Glenn
Nancy Kosek
Kim Lockard
Christine Melcher
Leslie Moyer
Joe Price
Dianna Schuller
Gina Wakeham
Denise Kares
Molly Wilson
Chris Bisch
Chris Deluca
Susan Holmes
Melanie Rana
Jean Konopka
Lynn Brubaker
Barbara Clement
Helen Deutsch
Jon Erickson
Linda Heath
David Malm
Jean Murakami
Steven Parks
Anita Robinson
Ron Taylor
Jay Verburg
Ed Williams
Reen Dyson
Lori Brown
Jennifer Cortel
Jim Folger
Bruce Gould
Yohannes Hailu
John Human
Dave Larsen
John McDaniels
Karolyn Morris
Eileen Ross
Thomas Shaw
Esti Weiss
Sara Villanueva

Linda Stewart
Donna Williams
Sharon Bramson
Jerry Chase
Bill Goff
Arthur Jasper
Bob Lowe
Maurice Rouman
Rob Struckman
Margaret Wilson
Kamal Bishara
Jenni Wilson
Marc Gilmartin
Ed Kelsey II
Doug Sabourin
Paul Advokaat
Mike Clay
Barry Finnis
Frank Gordon
Michael Krouze
Judy Lui
Ruth Messerli
Lelund Nelson
Rob Relaford
Mary Stewart
Ashley Young
Pat Sheldon
Richard Alire
Rick Bomar
Shirley Ewer
June Kegebein
Wayne Schrunk
Scott Baxter
Jean Butts
Jeffrey Costello
Doug Dibley
Bea Fieberg
Anne Jackson
Dan Meadows
Joanna Olson
Jeannette Rapp
Ryan Robinson
Ed Therriault
Judy Vevoda
Dale Wolcott
Richard Alire
Marjorie Brugman
Carmen Deildal
Pat Fuhrman
Cathy Graue
Cindy Hatley
Steve Inman
Mike Lee
Allan Miller
Teresa Phillips
Kevin Saner
Eric Taylor
David Wiltse
John Elwick

Beth Adamek	Jim Adams	Esther Boller	Sharon Bramson
Jane Brunt	John Butterworth	Mark Carlson	Barbara Clement
Dennis Clement	Jim Colbern	Bea Coon	Jill Curtis
Pat Dempster	Bertha Diggins	Lynette Duncan	David Dye
Sheri Eakins	Lyle Fink	Georgia Fontaine	Keith Fontaine
Michele Freethy	John Furber	Josie Furber	Sara Gamache
Roxane Guiles	Pauline Harter	Susan Hastings	Mark Hatfield
Reid Herron	Heidi Hicks	Susan Holmes	Ernst Hossman
Merja Jonninen	Glen Jorgensen	Corey Dahler	Dan Kennedy
Leslie Kirsch	Candy Klingman	Craig Lasher	Cathy Lee
Mark List	Rocky Matranga	Elias Mattar	Tom Mellor
Leslie Moyer	Nan Mueller	Cheryl Narlock	Edith Niederhauser
Joel Ohm	George Pantalia	Sally Pesce	Bobbi Jo Quigley
Raye Rapp	Don Roberts	Greg Saner	Sharon Saner
Theresa Shackelford	Margo Sporleder	Steve Sprossig	Debbie Stougard
Mary Sullivan	Peter Swart	Oral Taylor	Rochelle Tolleson
Tauno Toukola	Calvin Triemstra	Michael Tyksinski	Bill Walters
Charles Wheeler	Donna Williams	Faith Williams	Chuck Willis
Mary Wilson	Terry Anderson	Steve Baglien	Gloria Balmeo
Bill Barber	Larry Bluhm	Steve Bramson	Linda Bugni
Mike Bugni	William Carey	Pat Childs	Ricky Diedrich
Rebecca Dutton	Mike Fasen	Steve Franklin	Jim Gilbertson
Jackie Graham	Vern Guenther	Steve Gurr	Richard Hanson
Mary Karr	Rob Lilly	John Lowe	Candis Lufkin
Walter Lufkin	George Magistad	Robert Mann	Steve Marth
Pauline Harter	David McCaddon	Dave Miller	Ed Mitzel
Bebe Moran	Nancy Nasif	Terry Newby	Jack Novak
Ingrid Ohm	William Olson	James Oswald	Shelley Pauls
Dennis Pettitt	Jeff Rapp	Melinda Ridgewell	Kevin Roberts
Dan Schmitter	Paul Seely	Wayne Shelman	Debbie Simmons
Pat Smith	Paul Smithburg	Vicki Sue Smithburg	Marty Urrutia
Bob Webster	Janet Wild	Ted Puckett	Paul Advokaat
Monica Aldridge	Etta Alvord	John Bastendorff	Rick Bell
Brad Bond	Dee Dee Borunda	Dawn Bowers	Cynthia Braun
Mike Clay	Leigh Ann Craven	Marjut Eskelinen	Robert Evans
Barry Finnis	David Frantz	Mike Glenn	Frank Gordon
Carol Gregor	Rene Hallman	Alena Halverson	Lilli Hauser
Andres Himiob	Steve Hinson	Corinne Koppang	Michael Krouze
Rodney Kunnanz	Connie Lee	Mark List	Kim Lockard
Judy Lui	Rick Mangan	Mark Martin	Kirk McClain
Patrick McCoy	Jacqueline McKenzie	Bill Miller	Kristen Miller
Brett Morrison	Janis Myrick	Michael Naccarato	Lelund Nelson
Cheryl Peck	Rob Relaford	Becky Sandoval	Roger Scales
Kim Sherman	Marja Toukola	Tauno Toukola	Trina Waggoner
Gina Wakeham	Wanda Williams	Dean Alvord	Shannon Barton
Deborah Booce	Marlene Brown	Pam Callahan	Bob Coon
Jeffrey Costello	Karen Denny	Sheryl Diggs	Bill Eldridge
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Kim Mitchell	Billy Murphy	Binji Murphy	Willy O'Brien
Steven Parks	Jim Privette	Chris Randall	Larry Romey
Buddy Shaver	Kerry Sherman	Daniel Smith	Hilary Smith
Lydia Smith	Harry Smith	Rosa Torres	Dotty Turi
Joel Vasey	Sandra Vasey	Darrel Wright	Ju Yun
Robert Boyle	John Beck	Linda Bugni	Jim Campbell
Teodoro Celi	James Davies	John Frost	Greg Gibson
Ron Hamm	Jim Hunley	Richard Kamp	Jeff Kunnanz

Lyle Fink	Bruce Gould	Pat Kinzler	Deborah L'Amoureux
Claude McInnis	Tom Mellor	Hank Moore	Rick Randall
Don Roberts	Marilyn Wilson	Sharon Baker	Gretchen Bogard
Christopher Brown	Rico Cayetano	Chris Deluca	Janet Esterly
Jim Franz	Pearl Massotti	Anna Salazar	Lane Strickland
Tony Valentine	Eric Visser	Andy Vouros	Colin Williamson
Warren Bailey	Jerry Baldik	Cheryl Berg	Dee Dee Brees
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Kerry Sherman	Greg Still	Hans-Peter Weiss	Liz Yount
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Jason Terrell	Ann Walker	Bob White	Mitch Wilkerson
Walter Williams	Lance Walker	Amos Hunter	Corey Kahler
Mark Koppang	Steve Maxwell	Bill Mazzaresse	Scott McKay
Karolyn Morris	Mike Motland	Fred Richards	Carol Adams
Dean Alvord	Jeff Bement	Leslie Carr	Casper Engh
John Glasgo	Jim Ledlow	Pam Ledlow	Coulter Morgan
Jack Novak	Ron Taylor	Derek Tyree	Ed Weiss
Kurt Anderson	Ray Anderson	Richard Bendixen	Jerry Chase
Georgette Cortel	Jennifer Cortel	Lee DuBois	Ken Fenton
Danette Glasgo	Barb Gurr	Gene Heinrichson	Dave Larsen
Mike Lee	Allan Miller	Jason Terrell	Gene Arnold
Guy Bandioramonte	Dick Botts	Mark Fenn	Mari Hunnicutt
Rodger Lacy	Mark List	Patrick McClusky	Michelle Morrow
Joanne Olson	Lisa Parks	Steven Parks	Scott Railton
John Shields	Rebecca Shields	Ken Storkel	Ruth Storkel
Ron Taylor	Mary Vandermark	Bob Webster	Laurie Westler
Ed Williams	Tom Williams	Dan Yamasaki	Charlie Buck
Dawn Lewis	Judy Lui	Kevin Saner	Joni Urrutia
Larry Amende	Robert Anderson	Andrew Avis	Daryl Baldik
Gary Barnett	Richard Bell	Thomas Berry	Catreena Bingaman
Rick Bomar	Larry Brown	Richard Bruhn	Tim Burford
Jim Buxton	Marc Carlos	Warren Carlton	Dan Dafoe
Sue Dandurand	Carolyn Davis	Don Davis	David Gacek
Peter Gilmartin	Brian Grennan	Cindy Gomberg	Shelly Gunn
Susan Gurr	Steven Haynes	Mark Haukaas	Ted Hickey
Tena Jelvik	Diane Jobe	Holly Jones	Chuck Kerr
Jayme Korn	Carrie Longmire	Val Loveys	John Lukyamuzi
Gail McCormick	John McCormick	Gary McKay	Molly Matson
Dave Money	Theresa Moore	Priscilla Pike	Heidi Niederhauser
Phil Olson	Dave Patterson	Dwight Pauls	Bob Pesicka
Don Pfaff	Ida Prange	Rick Randall	Carolyn Rice
Mark Ridgewell	Traci Rokat	Tom Sampson	Mark Sartain
Jeff Savage	John Scharf	Rebecca Shields	Clark Simmons
Lori Simmons	Hugh Sincock	Doug Spear	Mark Spurling
Jana Thurner	Debra Tiecke	Trent Tiecke	Celine Urrutia
Jeannine Wicker	Thomas Williams	Greg Wilson	Lisa Wright
Stacey Wright	Jeff Yurak	Julie Younker	Tom Baldik
Ed Barber	Alex Baroumes	Joan Bell	Alan Butcher
Guy Byington	Mark Dahl	Linda Fideler	Tom Fideler

Mason Glavich	Vern Guenther	Lloyd Gunderson	Sharrie Hicks
Teresa Holm	Donald Igarta	John Jenott	Robert Knox
Tom Kovacich	Joanne Korsvik	Alan Lukacic	Dorothy Lyons
Deborah McGill	Billy Murphy	Binji Murphy	Warren Peters
Jon Reich	Jane Richmond	Chris Saner	Matt Speights
Jerome Taylor	John Bates	Myron Clinton	Phil Connon
Bill Haviland	Kelly Hughes	Carol Kinzler	Patrick Kinzler
Kevin Minor	Darla Mulka	Maureen Mullen	Eric Orwell
Tina Petersen	Fred Shamp	Theresa Tanner	Bill Winegardner
David Yokers	Michael Jansson	John Armstrong	Gloria Balmeo
Mike Bennett	Larry Bluhm	Mark Bunnell	Steven Celestres
Myron Clinton	James Colbern	Mark Fleming	Mary Jo Garvin
Randy Garvin	Dale Gifford	Linda Gifford	Gary Haley
Denelle Ireland	Jack Irwin	Sandi Johnson	Dan Langdon
Diane Langdon	Bill Lawson	Jim Ledlow	Nicole Leiper
Richard Misek	Michael Moran	Pauleeta Murphy	Terrell Newby
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Keith Thomas	Don Valdez	Arlane Webb	Patti Webster
Liz Weicht	Edward Weiss	James White	Julie A. Wilson
Patricia Estabrook	Dean Almer	Marty Anderson	Robert Back
John Beck	Jack Benson	Donna Bigham	Camille Boesplug
Steve Born	Kenneth Brown	Kim Brown	David Cain
Mike Chapman	Susan Doiron	Lynette Duncan	Tammy Frahser
Shelley Freden	Debbie Furnia	Sandra Gadd	Judith Graham
Dale L'Amoureux	Eugene Langstaff	Carol Magistad	Mary Marquez
Deborah McGill	Brad Mehtala	Tom Mellor	John Meyer
Debbie Miller	Price Northcutt	Lon Ohm	Mark Petticord
Sharon Saner	Jack Shelton	Jill Timlick	Gail Vasey
Willa Allman	Donna Arbuckle	Pamela Beutz	Brian Brookbank
Catherine Carey	Paul Carter	Debbie Furnia	Barbara Hoak
Carol Hoak	Jeffrey Kresse	Janice McManus	James Oswald
Linda Riley	Maury Sargeant	Chris Satterwhite	Mary Schact
David Stevenson	Paul Sullivan	Brad Thorlton	Jerry Baldik
Alice Behnke	Al Bornstein	Greg Bunger	Carolyn Davis
Marion Friedrich	Susan Gurr	Joel Pike	Eileen Septka
Valerie Tavenner	Rick Thomas	Sandy Willis	George Cantu
Coleen Carpenter	Alan Dahl	Dora Ignacio	Leona Moore
Donna Sweet	Celine Urrutia	Donna Wahl	Denise Wright
Susan Hastings	Dave Dye	Bill Barber	Terrie Bettcher
Doug Boese	Wayne Bryson	Paul Clark	Linda Donato
David Dye	Lana Frazier	Timothy Grady	Lloyd Hedberg
John Hura	Jack Irwin Jr.	Dayle Langdon	Lucille Langdon
Rick Leffler	Anita Lerew	Mark List	Susan Maury
Ed Mitzel	Julie Nagel	Phyllis Norman	Brian Russell
Connie Schmitter	Pat Smith	Walter Tesch	Jim Wagner II
Daryl Wilford	Judy Baglien	Joan Bell	Caryl Benedict
Jo Bloom	Eric Crute	Darrell Duncan	Tom Emery
Sylvia Fashant	Trisha Haggerty	Steve Kuhn	Roger Lambrou
Gene Simpson	Kathy Unkie	Mike Voiers	Dale Ward
Patricia Ware	Scott Adams	Gail Allen	Betty Anderson
Marty Anderson	Robert Back	William Barber	John Beck
Pamela Beutz	Rob Bingaman	Bonnie Bjork	James Blair
Kevin Blanscet	David Cain	Patty Campbell	Marc Carlos
Mark Carlson	Kim Carpenter	Steve Celestres	Robin Daily
Susan Doiron	Tom Emery	Dan Jackson	David Lenhart
David Lindsay	Wendee Lumsden	Dale Marsh	Jill McCullough

Brad Mehtala	Gary Miller	Peni Miller	Jennifer Minor
Laurie Myrick	Sheila Schoenig	Brian Scott	Doug Smith
Bob Spears	Lyn St Laurent	Janis Stratton	Al Tennent
Barb Todak	Steve Turner	Brad Wagner	Teri Blanscet
Gail Allen	Javier Arellano	Robert Back	George Cantu
Ken Biallas	James Blair	Toonie Buxton	David Cain
Aaron Cortel	Alan Dahl	Tim Dutter	Suzanne Ferguson
Gary Gabbert	Dean Grefthen	Sever Hagen	Theresa Hoopnaina
Karol Kimbro	Greg Kreger	Tom Mellor	Mike Moran
Fred Richards	Terry Webb	Vernal Rolando	Andy Avis
Dick Cromwell	Vicky Diedrich	Bobbi Doolittle	Gerry Flock Jr.
Ron Gerrard	Lita Glawe	Tim Haist	Jeff Grogan
Carol Haselmire	David Heideman	Dave Heilman	Donna Holt
Gretchen Huhndorf	Bob Joost	Ed Kelsey III	Mike King
Luis Leon	Jeff Mackin	Mary Marquez	Linda Olson
Carrie Pesicka	Mary Reeder	Brian Schuldt	Clark Simmons
Scott Simpson	Robert Spearman	Gerhard Stettler	Doris Still
Greg Still	Daryl Thaete	Randy Thrasher	Tom Beal
Frederick Belknap	Mike Bennett	Mary Bergeron	Carol Blackwell
Robert Blackwell	Mark Bunnell	Bill Burgess	Diane Charlson
Myron Clinton	Shirley Cobb	Jim Colbern	Linda Donato
Byron Gable	Jack Hanson	Bob Howerton	Kelly Hughes
Sheri Jennings	Sandi Johnson	Pat Kinzler	Bill Lawson
Leonard Martinez	Susan Maury	Jan Misek	Darla Mulka
Sid Omev	Cathy Points	Susan Tinsley	Rosa Torres
Ron Tubbs	Pam Tucker	Byung Yim	Christine Bunger
Kelly Fenison	Sandy Gadd	Gordon Haggerty	Linda Hamill
Lihrl James	Armi Jansson	Debra Jones	Corky Kegebein
Karol Kimbro	Patsy Knott	Jan Leyde	Elizabeth Mann
Nan Mueller	Rick Norman	Dick Tyree	Ruth Messerli
Erik Bohlin	Jeff Chrush	Helen Coleman	Mayone Feller
John Furber	Kathy Gale	Gabriella Gardfeldt	Tony Hatley
Glen Jorgenson	Corey Kahler	Candy Klingman	Dan Korn
Cydlee Maly	Elias Mattar	Scott McKay	Kim Mitchell
Coulter Morgan	Julie Nagel	Mary Palmer	Tracey Wallenberg
Chuck Wheeler	Faith Williams	Esther Boller	Suzanne Davis
David Deal	Greg Debo	Gail Johnson	Dave Parton
Pete Savage	Mark Wilde	Pam Beutz	Tim Cleaver
Kelly Fenison	Mike Fowler	Vern Guenther	Karl Nymon
James Oswald	Chris Satterwhite	Ann Brown	Tom Emery
Neil Fogleman	Larry Gates	Stuart Johnson	Ron King
Dave Lenhart	Tommie Sampson	Gerry White	Dan Anable
Cheryl Anderson	Bill Barber	Darla Baroumes	Elaine Bellamy
Garland Bellamy	Linda Burford	Bob Butler	Pam Callahan
Bob Clasby	Stacey Clasby	Jim Colbern	Dick Cromwell
Suzie Davis	Bob Edwards	Janet Grady	Tim Grady
Cookie Greer	Paul Greer	David Haberlach	Chris Halverson
Bill Haviland	Michael Hawkins	Mithcell Johnson	Jim Ledlow
Dawn Lewis	Bud Lewis	Mark List	Tony Magno
Debra Mathews	Julie McCarthy	Dave Miller	Tom Miner
Manuel Panasiuk	Christina Schoof	Karla Stage	Anita Trueba
Mark Trueba	Sharon Tuggle	Rosie Vasquez	Norma Wahl
Liz Weicht	Barbie Wilson	Chun Won	Stan Addink
Marty Anderson	Gilbert Barrios	Barb Clifton	Patricia DeWitt
Cindy Duncan	Tom Emory	Tammy Frahser	Shelly Haugen
Donna Hecktor	Debbie Jones	Michael Kelley	Don Kimbro
Carol Kimbro	Carol Kinzler	Greg Logan	Jon Schad
Sally Schroeder	Lori Sonsteli	Beverly Alumbaugh	Dennis Alumbaugh

Timmy Austin
Joey Boone
Tara Brown
Kari Bunning
Julie Casey
Todd Clark
Kevin Cruz
Michele Cruzat
Heather Dandurand
Tami Davis
Shawn Deluca
Darcy Drake
Sandy Gonzales
Michele Graden
Mary Guenther
David Hicks
Jimmy Hutchison
Jennifer Johnson
Regan Johnson
Jonathan Little
Shauna Lofgren
Kamalla Rice
Debbie Rurup
Adessa Shields
Dylan Thurner
David Todak
Diana Van Decar
Steve Weidner
D-Ann Weller
Danielle Weller
Jimmy Williams
Paul Yokers
Bobby Benson
Troy Brown
Joann Buck
Tim Carver
Sandy Casey
Darold DeBorde
David Eldridge
Simon Fishler
Louise Fothergill
Deanna Goble
Robert Hardman
Teresa Hartley
Andrea Hill
Danny Ireland
Todd Johnson
Jeff Martin
Rhonda McIntosh
John Olsen
Anna Panasiuk
Gary Rurup
Doug Simonds
Darren Yokers

Brent Oliver
Andrea Clark
Robbie Blair
Dylan Grafmyre
David Rhodes
Ricky Shamp
Kam Martin
Joey Perea
Benita Wahl
Shawn Dimock
Shawna Heflen
Sherry Neal
Kamalla Roesinger
Ricky Shamp
Sara Teeter
Charlene Lowrie
Ruth Markham
Marlayna Cortel
Michael Martinez
Timmy Shamp
Paul Sparks
Tommy Valencia
Dan'l Markham
Cathy Markham
Ron Jesser
Cathy Jesser
Frank Rice
Marlene Rice
Earl Thurner
Ezra Casello
Jana Thurner
Rebekah Casello
Cathy Back
Rick Wharton
Jane Frazier
Dave Flaskerud
Judy Flaskerud
Jim Hutchison
Greg Larson
Sid Moser
Tim Yokers
Sally Yokers
Nancy Amende
Jimmy Joseph
Joel Johnson
Marlene Johnson
Bill Wiley
Chris Wiley
Merri Nieuwejaar
Gordon Lance
Christie Lance
Daniel Graham
Dottie Graham
Al Deleza
Sandy Deleza
Rick Daniels

Debbie Daniels
Lynn Daniels
Rae Ann Daniels
Leon Daniels
Margaret Daniels
Barb Pfaff
Maureen Sabourin
Linda Martinez
Debbie Irwin
June Grengs
Fran Sodoma
Vi Leyde
Carol Galster
Betty Leonard
Debbie Stutzman
Cindy Langdon
Christy Pope
Susan Towery
Elvia Cromwell
Rose Upton
Laurie Miller
Pati Guenther
Sharon Prevette
Anne Jackson
Carol Kosterman
Ray Ellis
Judy Bornstein
Donna Moren
Meg McCammon
Judy Green
Mary Lesnett
Elaine Slaminski
Ken Ecker
Stu Hanson
Rick Cole
Mitch Johnson
Bill Adam
Marcie Strickland
Sheri Buck

Lynn Brown	Cathy Butts	Ross DeWitt	Gerry Flock
Paul Greer	Randy Kosek	Mark List	Jeff Lydeen
Willy O'Brien	Paul Shin	Dena Weikart	Mike Westler
Tim Cleaver	Ed DeRivas	Bill Eldridge	Donna Gurr
Peter Hector	Bryan Bell	Gabriella Bohlin	Delia Engh
Sara Gamache	Bonnie Hubbard	Gene Jones	Corey Kahler
Richard Kamp	Randall Mullen	Jack Novak	Marci Parducci
Sandy Phillips	Steve Risinger	Cindy Sampson	Barb Todak
Christine Tyree	Daniel Tyree	Hazel Warman	Michael Waters
Marce Weidner	Sue Weidner	Charles Wheeler	Sandra Woodbeck
Cliff Bisch	Kevin Blanscet	Ross DeWitt	Debbie Doel
Richard Frank	Annette Heurion	Charles Karr	Dan Korn
Jim MacFarlane	Cydlee Maly	Linda Roose	Andrea Sartain
Cindy Schlenker	Tim Semingson	Gisling VonFeldmann	Anita Bircher
Dean Alvord	Helena Andren	Thomas Andred	John Armstrong
Stephen Blanchard	John Butterworth	Janice Coghill	Bertha Diggins
Carole Gentzler	Ron Hamm	Ray Hansen	Reid Herron
Ernst Hossman	Karen Karatzas	Darla Lambott	Laurie Langdalen
John Lyon	Randall Mullen	Edith Niederhauser	Wendy Reamer
Brigitte Riem	Urs Riem	Darla Sandusky	Bill Slorah
Margo Sporleder	Silvia Trachsel	Maurita Verburg	Bob Weisse
Carol Williams	Greg Greeley	David Frantz	John Furber
James Green	Kim Mitchell	Dorrin Winn	Jacquon Bailey
Gaetano Bandiermonte	Janis Bement	Cecil Dickey	John Dollman
Gary Herigstad	Linda King	Neil Krenelka	Jim Ledlow
Kristin McKenney	John Pollen	Marie Russell	Buddy Shaver
Wyman Smalley	Linda Meyer	Lisa Martinsen	Melvin Knight
Kim Hamm	Steven Dunn	Pamela Dickerson	Pete Davies
Victoria Angelini	Richard Snyder	Chris Storti	Christina Walton
Josie Furber	Kathy Sabourin	Dwight Smith	Greg La Plante
Tiesa Brown			
Faye McCalmont	Virginia McManus		
Fred Hornbecker	Dan King	Greg Wood	Cal Freden
Carolyn Peterson			

Alice Ricks
 Sandy Barton
 Roy Siebold
 Dennis Pangburn
 Robert R. Beezer
 Charles V. Moren
 Thomas I'Anson
 William H. Ellis
 Maureen Morin
 John Bergen

Each child, sibling and/or parent of any plaintiff herein.
 Each past and present teacher of each child of any plaintiff herein.
 Any witness identified by any other party.

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Jerome J. Leveque
Julie A. Twyford
John C. Perry
Gregory M. Kane
Paul L. Kirkpatrick
Timothy J. Donaldson
Timothy P. Malarchick
Margaret E. Gleason

RESPOND TO: **Seattle**

May 16, 1988

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and Idaho

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Re: **Butler et. al., v. Barnett**
Lien v. Barnett
Jorgensen v. Barnett

EXHIBIT

"D."

May 16, 1988
Page 2

Dear Counsel:

Pursuant to discovery to date, the following is a list of witnesses for the designated cases. Defendants Barnett reserve the right to amend this list subsequent to the taking of discovery depositions which may reveal additional witnesses to those listed herein.

Butler, et. al., v. Barnett, et. al.

1. Donald Barnett
2. Barbara Barnett
3. Gary Lien
4. Bill Slorah
5. John Swenson
6. Jim Coleman
7. Donna Coleman
8. Steven Butler
9. Any and all teachers of Scott William Lien and Randy William Lien
10. Kathy (Lien) Butler's immediate family including her surviving mother and two brothers.
11. Linda Steinhower
12. All members of the CCBTC administrative staff and counseling department and elders as listed in CCBTC's answers.
13. Sandy Brown
14. Delores Viedec
15. Any witness identified by any other party herein

Brown v. Barnett, et. al.

1. Donald Barnett
2. Barbara Barnett
3. Sandy Brown
4. Lyle Brown
5. George Alberts
6. Scott Hartley
7. Jack Hicks
8. Frank Rice
9. Chris Bradley Hall
10. Any and all teachers of Tara Lynn Brown and Roy Steven Brown
11. All members of the CCBTC administrating staff and counseling department and elders as listed in CCBTC's answers
12. Any witness identified by any other party herein

May 16, 1988
Page 3

Hall v. Barnett, et. al.

1. Donald Barnett
2. Barbara Barnett
3. Membership of CCBTC
4. Cal Freden
5. Mary Freden
6. Senior Board of Elders of CCBTC
7. Administrative staff of CCBTC
8. Any witness identified by any other party herein

Lemke v. Barnett, et. al.

1. Donald Barnett
2. Barbara Barnett
3. Bob Howerton
4. Chani Hayes
5. Shannon Lemke
6. Robbie Carlisle
7. Gary Mitchel
8. Shelly Ward
9. Connie Carlisle
10. Cal Capener
11. Patricia Hornbecker
12. Christy Hansen
13. Freddy Williams
14. Frank Guthrie
15. Fred Hornbecker
16. Jim McCullough
17. E. Scott Hartley
18. Isabella Bertram
19. Michael Deny
20. Jeanne White
21. T. Alice Tennent
22. Julie Powell
23. Gwen Eldridge
24. Jerry Slanumski
25. Larry Walkemeyr
26. Eleonor Doriron
27. Bob White
28. Patsy White
29. Lucy Berliner
30. Jack Hicks
31. Jason Coleman
32. Aaron Burdette
33. Mark Williams
34. Brenda Williams
35. Mark Ward

May 16, 1988

Page 4

36. Mary Winsdor
37. Adam White
38. Ezna Cosselo
39. Jerry Slaminski
40. Dee Chabot
41. George Alberts
42. Diana Alberts
43. Dan O'Brien
44. Any witness identified by any other party herein.

Chabot v. Barnett, et. al.

1. Donald Barnett
2. Barbara Barnett
3. Denis Cordas
4. Mike Saubourin
5. Maureen Sauborin
6. Jack Hicks
7. Jack DuBois
8. E. Scott Hartley
9. Counseling staff of CCBTC
10. Administrative staff and teachers of Shawna Michell Chabot
11. Michael Sterling Chabot
12. Brian Chabot
13. Any witness identified by any other party herein

Jorgensen v. Barnett

1. Donald Barnett
2. Barbara Barnett
3. Cal Freden
4. Jack Hicks
5. Jack Dubois
6. E. Scott Hartley
7. George Alberts
8. Nancy Graber
9. Karen Wilson
10. Frank Wilson
11. Alice Ricks
12. All individuals involved in the competency hearing involving Maureen Jorgensen including the judge and her attorney and any witnesses
13. Denis Pangbourins
14. Maxine Glover
15. Ray Rapp
16. Peggy Manee
17. Dan O'Brien
18. Any witness identified by any other party herein.

May 16, 1988
Page 5

Ehrlich v. Barnett

1. Donald Barnett
2. Barbara Barnett
3. Ralph Alskog
4. Rosemary Alskog
5. Mike Ehrlich
6. Sandy Ehrlich
7. Terry Myrick
8. Lanny Peterson
9. Molly Faylor
10. Bonnie Hartley
11. E. Scott Hartley
12. Jack DuBois
13. Katherine Gacek
14. Marilyn Downs
15. Karen Herbert
16. Jack Hicks
17. Any witness identified by any other party herein

This list will be updated upon the completion of plaintiffs' depositions as to specific members of CCBTC administrative staff and eldership.

Very truly yours,


RODNEY D. HOLLENBECK

:tj

ORIGINAL

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CIVIL TRACK 1

CIVIL TRACK ONE
THE HONORABLE GARY LITTLE

SUPERIOR COURT OF WASHINGTON FOR KING COUNTY

KATHY LEE BUTLER, et. ux.,
et. al.,)

Plaintiffs,)

v.)

DONALD LEE BARNETT, et. ux.,
et. al.,)

Defendants,
Third Party Plaintiffs,)

v.)

GARY LIEN,

Third Party Defendant.)

SANDY EHRLICH, et. ux., et. al.,)

Plaintiffs,)

v.)

RALPH ALSKOG, et. ux., et. al.,)

Defendants.)

MAUREEN P. JORGENSEN,

Plaintiff,)

v.)

COMMUNITY CHAPEL AND BIBLE
TRAINING CENTER, et. al.,)

Defendants.)

BARNETTS' BRIEF IN OPPOSITION
TO MOTION TO COMPEL DISCOVERY,
ETC. : 1
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JUN 0 6 1986
CLERK OF COURT
KING COUNTY
SUPERIOR COURT

CONSOLIDATED/TRACK ONE
NO. 86-2-18176-8

BARNETTS' BRIEF IN OPPOSITION
TO MOTION TO COMPEL DISCOVERY
AND FOR A PROTECTIVE ORDER

77.5
Evans, Craven & Luckie, P.S.

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