

CASE#: 86-2-18429-5 CIVIL JUDGMENT# NO JUDGE ID: 025
 TITLE: EHRlich ETVIR ETAL VS ALSKOG ETUX ETAL
 FILED: 07-31-86
 CAUSE: PIN PERSONAL INJURY
 DISPOSITION: STPR DATE: 04-10-89 SETTLED BY PARTIES AND/OR AGREED JUDGMENT

ARCHIVED: 11-24-91

CONSOLIDATED: 86-2-18176-8

NOTE1: *CASE SET P3 *CONSOL UNDER 86-2-18176-8 *SUB #73 SEALED PER SUB #74

NOTE2: *CIVIL TRACK I UNDER 86-2-18176-8

-----PARTIES-----

CONN	LAST NAME,	FIRST MI TITLE	LITIGANTS	DATE
PLA01	EHRlich,	SANDY		
PLA02	EHRlich,	MICHAEL W/H		
PLA03	LEMKE,	LARRY		
GAL01	LEMKE,	LARRY		
MNR01	LEMKE,	SYBIL N		
PLA04	REYNOLDS,	KATHRYN	DSM 11-12-87	
PLA05	CHABOT,	DEE		
GAL02	CHABOT,	DEE		
MNR02	CHABOT,	SHAWNA M		
MNR03	CHABOT,	MICHAEL G		
MNR04	CHABOT,	NICHOLAS S		
DEF01	ALSKOG,	RALPH		
DEF02	ALSKOG,	ROSEMARY		
DEF03	HOWERTON,	ROBERT		
DEF04	HARTLEY,	E SCOTT	STPR 11-17-87	
DEF05	BARNETT,	DONALD LEE		
DEF06	BARNETT,	BARBARA		
DEF07	COMMUNITY CHAPEL AND BIBLE TRAINING CENTER			

-----ATTORNEYS-----

CONN	LAST NAME,	FIRST MI TITLE	LITIGANTS	DATE
ATP01	ADLER,	RICHARD H	1,5,GAL	
ATD01	MARTIN,	DAVID L	1-7	
WTD02	BOND,	MICHAEL J	1-7	
WTD03	BUGNI,	MICHAEL W	1-7	
ATD04	HOLLENBECK,	RODNEY D		
ATP02	MESSINA,	JOHN		
ATD05	ROSENOW,	JACK G		

-----APPEARANCE DOCKET-----

SUB#	DATE	CD/CONN	DESCRIPTION	SECONDARY	MICROFILM
-	07-31-86	\$FFRC	FILING FEE RECEIVED - CIVIL ADLER GIERSCH & READ	70.00	
1	07-31-86	SMCMP	SUMMONS & COMPLAINT		
2	08-18-86	APR	APPEARANCE LEE SMART ET AL FOR ALL DEFTS		
3	08-19-86	APR	APPEARANCE LEE SMART ETAL & MOREN LAGESCHULTE FOR ALL DEFS		
4	11-18-86	ORARC	ORDER AUTHOR REMOVAL OF COURT FILE		
5	12-04-86	NT0EX	NOTICE OF ORAL EXAM		

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SUB#	DATE	CD/CONN	DESCRIPTION	SECONDARY	MICROFILM
5.5	12-10-86	NTOEX	NOTICE OF ORAL EXAM		
6	12-11-86	NTMTDK	NOTE FOR MOTION DOCKET	12-19-86MS	
		ACTION	MOTION FOR DEFAULT		
7	12-11-86	NTMTDK	NOTE FOR MOTION DOCKET	12-19-86MS	
		ACTION	MTN FOR DEFAULT		
8	12-11-86	MTAFOD	MOTION & AFFDVT FOR ORD OF DEFAULT		
9	12-12-86	ANCC	ANSWER & COUNTER CLAIM ALL		
10	12-16-86	SBDT	SUBPOENA DUCES TECUM		
11	12-16-86	NTOEX	NOTICE OF ORAL EXAM		
12	12-16-86	ANI	ANSWER TO INTERROGATORIES/S LEMKE		
13	12-16-86	ANI	ANSWER TO INTERROGATORIES/L LEMKE		
-	12-19-86	MINUTE	CIVIL MOTIONS CAL		
14	12-30-86	SBDT	SUBPOENA DUCES TECUM		
15	12-30-86	NTOEX	NOTICE OF ORAL EXAM		
16	12-30-86	NTOEX	NOTICE OF ORAL EXAM		
17	01-07-87	ANSC	ANSWER TO COUNTERCLAIM		
18	01-20-87	AFSR	AFFIDAVIT OF SERVICE		
19	03-04-87	\$SHRT	SHERIFF'S RETURN	55.00	
20	03-06-87	MTCM	MOTION TO COMPEL DISCOVERY	03-19-87MS	
21	03-06-87	NTMTDK	NOTE FOR MOTION DOCKET		
22	03-16-87	AF	AFFIDAVIT IN OPPOSITION		
-	03-19-87	MINUTE	CIVIL MOTIONS CAL		
-	05-13-87	DEPR	DEPOSITION RECEIVED OF SYBIL LEMKE		
-	05-13-87	DEPR	DEPOSITION RECEIVED OF LARRY LEMKE		
23	06-29-87	PT	PETITION FOR		
24	06-29-87	DRAPGL	ORDER APPOINTING GUARDIAN AD LITEM		
25	06-29-87	PT	PETITION FOR		
26	06-29-87	ORAPGL	ORDER APPOINTING GUARDIAN AD LITEM		
27	08-03-87	NTTSNA	NT FOR TRIAL & STMNT OF NONARBITRA		
		ACTION	PERSONAL INJURY		
		ACTION	15 DAYS		
28	08-04-87	NTASCC	NOTICE OF ASSOCIATION OF COUNSEL		
		ATP02	MESSINA, JOHN		
29	08-28-87	SBDT	SUBPOENA DUCES TECUM		
30	08-28-87	NTOEX	NOTICE OF ORAL EXAM		
30.5	08-28-87	SBDT	SUBPOENA DUCES TECUM		
31	09-01-87	ANI	ANSWER TO INTERROGATORIES/PLA		
32	09-01-87	ANI	ANSWER TO INTERROGATORIES/PLA		
33	09-01-87	ANI	ANSWER TO INTERROGATORIES/PLA		
34	09-01-87	ANI	ANSWER TO INTERROGATORIES/PLA		
35	09-16-87	NTOEX	NOTICE OF OPAL EXAM		
36	09-24-87	ANI	ANSWER TO INTERROGATORIES/PLA		
37	09-24-87	ANI	ANSWER TO INTERROGATORIES/PLA		
38	09-24-87	RSP	RESPONSE TO RQ FOR PRODUCTION		
39	09-24-87	ANI	ANSWER TO INTERROGATORIES/SUPPL/PLA		
40	09-24-87	ANI	ANSWER TO INTERROGATORIES/SUPPL/PLA		
41	09-24-87	ANI	ANSWER TO INTERROGATORIES/PLA		
42	09-24-87	ANI	ANSWER TO INTERROGATORIES/PLA		
43	09-24-87	ANI	ANSWER TO INTERROGATORIES/CHABOT		

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-----APPEARANCE DOCKET-----

SUB#	DATE	CD/CONN	DESCRIPTION	SECONDARY	MICROFILM
44	09-24-87	ANI	ANSWER TO INTERROGATORIES/CHABOT		
45	09-24-87	AN	ANSWER TO RQ FOR PRODUCTION		
46	10-06-87	NTOEX	NOTICE OF ORAL EXAM		
47	11-06-87	DCLR	DECLARATION OF RICHARD ADLER		
48	11-06-87	MT	MOTION FOR CONSOLIDATION		
49	11-06-87	DCLR	DECLARATION & MEMO OF COUNSEL		
50	11-06-87	MT	MOTION	11-16-87	
		ACTION	1:30;PJ;MTN FOR PREASSIGNMT & EARLY		
		ACTION	TRIAL DATE; SPECIAL SETTING		
51	11-06-87	NTMTDK	NOTE FOR MOTION DOCKET		
52	11-06-87	NTMTDK	NOTE FOR MOTION DOCKET	11-16-87	
		ACTION	1:30;PJ;MTN FOR CONSOLIDATION;		
		ACTION	SPECIAL SETTING		
53	11-10-87	NTWDA	NOTICE OF WITHDRAWAL OF ATTORNEY		
		WTD03	BUGNI, MICHAEL W		
54	11-12-87	MTDSM	MOTION TO DISMISS/K REYNOLDS		
55	11-12-87	ORDSM	ORDER OF DISMISSAL VS K REYNOLDS		
		EXP01	EX-PARTE, DEPT		
55.5	11-13-87	NTWDA	NOTICE OF WITHDRAWAL OF ATTORNEY		
		ATD02	BOND, MICHAEL J		
56	11-16-87	ORACT	ORD ASSIGN CASE TO CIVIL TRACK I		
57	11-16-87	MM	MEMORANDUM OPPOS CONSOL/DEF		
58	11-16-87	OB	OBJECTIONS TO ATTY WDRAWAL/PLA		
59	11-17-87	ORDSM	ORDER OF DISMISSAL VS E S HARTLEY		
60	11-17-87	ORWA	ORDER FOR WITHDRWL OF ATTORNEY FOR ALSKOG ET AL		
61	11-24-87	\$AFSR	AFFIDAVIT OF SERVICE	24.00	
62	12-15-87	APR	APPEARANCE FOR DEFTS BARNETT		
		ATD04	HOLLENBECK, RODNEY D		
63	01-27-88	APR	APPEARANCE FOR ALSKOG		
		ATD05	ROSENOW, JACK G		
64	02-02-88	APR	APPEARANCE FOR ALSKOGS		
		ATD05	ROSENOW, JACK G		
65	03-25-88	PREHRG	CR DAVE ERWIN		
		JDG19	JUDGE GARY M LITTLE, DEPT 19		
66	04-04-88	\$AFSR	AFFIDAVIT OF SERVICE	24.00	
-	04-21-88	DEPR	DEPOSITION RECEIVED OF SYBIL N LEMKE		
-	09-12-88	ORACT	ORD REASSIGN CASE TO CIVIL TRACK I		
		JDG25	JUDGE JOHN RILEY, DEPT 25		
67	12-19-88	DCLR	DECLARATION OF DON M GULLIFORD		
68	01-06-89	PREHRG	CR VICTORIA RACCAGNO		
		JDG25	JUDGE JOHN RILEY, DEPT 25		
69	01-13-89	NT	NOTICE OF ORAL EXAM BERORE TRIAL		
70	01-25-89	NTOEX	NOTICE OF ORAL EXAM		
71	01-27-89	NTMTDK	NOTE FOR MOTION DOCKET	02-06-89	
		ACTION	4P/RILEY/MT OPPOSE TO MICHAEL BOND		
		ACTION	REQUEST TO WITHDRAW AS COUNSEL		
72	02-06-89	PREHRG	CR RAELENE SEMAGO		
		JDG25	JUDGE JOHN RILEY, DEPT 25		
73	04-07-89	CNRSE	CONFIDNTL REPORT IN SEALED ENVELOPE		

11-24-91

KING COUNTY SUPERIOR COURT

PAGE 4

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-----APPEARANCE DOCKET-----

SUB#	DATE	CD/CONN	DESCRIPTION	SECONDARY	MICROFILM
74	04-07-89	ORSRF	ORD SEALING RECORD/FILE		
75	04-10-89	ORDSM	ORDER OF DISMISSAL VS ALL		
76	05-22-89	RCP	RECEIPT/BLOCK ACCOUNT		

-----END COPY CASE-----

FILED

1988 JUL 31 PM 2:55

SUPERIOR COURT OF THE STATE OF WASHINGTON
COUNTY OF KING

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

SANDY EHRlich and MICHAEL EHRlich,) wife and husband; LARRY LEMKE,) parent; LARRY LEMKE, Guardian ad) Litem on behalf of SYBIL N. LEMKE,) a minor; KATHRYN REYNOLDS; DEE CHABOT, parent; DEE CHABOT,) Guardian ad Litem on behalf of) SHAWNA MICHELLE CHABOT, MICHAEL) GRANT CHABOT, NICHOLAS STERLING) CHABOT, minors,)

Plaintiffs,

v.

RALPH ALSKOG and ROSEMARY ALSKOG,) husband and wife; ROBERT HOWERTON) and JANE DOE HOWERTON, husband) and wife; E. SCOTT HARTLEY and) JANE DOE HARTLEY; DONALD LEE) BARNETT and BARBARA BARNETT,) husband and wife; COMMUNITY CHAPEL) AND BIBLE TRAINING CENTER, a) Washington Corporation; "JOHN) DOES" 1-4 and "JANE DOES" 1-4,) husbands and wives; FIRST DOE) CORPORATION; and FIRST DOE) PARTNERSHIP,)

Defendants.

86-2-18429 5
NO.

SUMMONS FOR
COMPLAINT FOR PERSONAL
INJURIES AND DAMAGES

TO THE DEFENDANTS ABOVE-NAMED

A lawsuit has been started against you in the above-entitled court by the above-named plaintiff. Plaintiff's claims are stated in the written complaint, a copy of which is served upon you with this summons.

FILED
37-31-1986
2:53 P.M.

KING COUNTY SUPERIOR COURT
M. JANICE MICHELE
KING COUNTY CLERK
SEATTLE, WA.

86-2-18429-5

REG/RECEIPT #	TRAN-CODE	DOCKET-CODE
32-88658	1100	3PFR0
PAID BY: ADLER, GIERSON AND REAL		
TRANSACTION AMOUNT:		578.88

1 In order to defend against this lawsuit, you must
2 respond to the complaint by stating your defense in writing, and
3 serve a copy upon the undersigned attorney for the plaintiff
4 within 20 days after the service of this summons, excluding the
5 date of service, or a default judgment may be entered against
6 you without notice. A default judgment is one where the
7 plaintiff(s) are entitled to what they ask for because you have
8 not responded. If you serve a notice of appearance on the
9 undersigned attorney, you are entitled to notice before a
10 default judgment may be entered.

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

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

20 If you are the parent of a child named as a party in
21 this lawsuit you are receiving notice of this claim pursuant to
22 RCW 4.24.010.

23 If you are the parent of a child named as a party/
24 plaintiff in this lawsuit you must join as a party/plaintiff to
25 the suit within twenty (20) days or your right to recover
26 damages under RCW 4.24.010 will be barred.

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

3 Dated this 31st day of July, 1986.

4 ADLER, GIERSCH & READ,

5 

6 Richard H. Adler
7 Attorney for Plaintiff

8 File Response with:

Serve a Copy of your Response
9 on:

10 Clerk of the Court
11 King County Courthouse
12 3rd and James
13 Seattle, WA 98104

Richard H. Adler
Adler, Giersch & Read
1211 Smith Tower
Seattle, WA 98104

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FILED
JUL 31 PM 2:50
SUPERIOR COURT
KING COUNTY

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

SANDY EHRLICH and MICHAEL EHRLICH,)
wife and husband; LARRY LEMKE,)
parent; LARRY LEMKE, Guardian ad)
Litem on behalf of SYBIL N. LEMKE,)
a minor; KATHRYN REYNOLDS; DEE)
CHABOT, parent; DEE CHABOT,)
Guardian ad Litem on behalf of)
SHAWNA MICHELLE CHABOT, MICHAEL)
GRANT CHABOT, NICHOLAS STERLING)
CHABOT, minors,)

86-2-18429 5
NO.

COMPLAINT FOR PERSONAL
INJURIES AND DAMAGES

Plaintiffs,

v.

RALPH ALSKOG and ROSEMARY ALSKOG,)
husband and wife; ROBERT HOWERTON)
and JANE DOE HOWERTON, husband)
and wife; E. SCOTT HARTLEY and)
JANE DOE HARTLEY; DONALD LEE)
BARNETT and BARBARA BARNETT,)
husband and wife; COMMUNITY CHAPEL)
AND BIBLE TRAINING CENTER, a)
Washington Corporation; "JOHN)
DOES" 1-4 and "JANE DOES" 1-4,)
husbands and wives; FIRST DOE)
CORPORATION; and FIRST DOE)
PARTNERSHIP,)

Defendants.

COME NOW the Plaintiffs, by and through their attorneys
of record, Richard H. Adler of ADLER, GIERSCH & READ, P.S., and
for cause of action against the Defendants state and allege as
follows:

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I. PLAINTIFFS

1.1 The Plaintiffs Sandy Ehrlich and Michael Ehrlich, are wife and husband, and at all times material hereto Plaintiffs were residents of the County of King, State of Washington.

1.2 Plaintiff Larry Lemke, father of Sybil N. Lemke, at all times material hereto was a resident of the County of King, State of Washington.

1.3 Plaintiff Sybil N. Lemke is a minor child, fourteen years of age, who resides with her father, Larry Lemke, in the County of King, State of Washington. Larry Lemke has been duly appointed the Guardian ad Litem of Plaintiff, Sybil N. Lemke, for purposes of this litigation. At all times material hereto, Plaintiff Sybil N. Lemke was a resident of the County of King, State of Washington.

1.4 Plaintiff, Kathryn Reynolds, at all times material hereto was a resident of the County of King, State of Washington.

1.5 Plaintiff, Dee Chabot, mother of Shawna Michelle Chabot, Michael Grant Chabot and Nicholas Sterling Chabot, at all times material hereto was a resident of the County of King, State of Washington.

1.6 Plaintiffs, Shawna Michele Chabot is a minor, eleven years of age; Michael Grant Chabot is a minor, ten years of age; and Nicholas Sterling Chabot is a minor, five years of age; Plaintiffs reside with their mother, Dee Chabot, in the County of King, State of Washington. Dee Chabot has been duly

1 appointed the Guardian ad Litem of Plaintiff, Shawna Michele
2 Chayot, Michael Grant Chabot, and Nicholas Sterling Chabot for
3 purposes of this litigation.

4 II. DEFENDANTS: RALPH AND ROSEMARY ALSKOG

5 2.1 The Defendants, Ralph Alskog and Rosemary Alskog,
6 are husband and wife, and at all times material hereto were
7 residents of the County of King, State of Washington.

8 2.2 Defendant Ralph Alskog is and at all times
9 material hereto was the Assistant to the Vice President of the
10 Defendant, Community Chapel and Bible Training Center.

11 2.3 Defendant Ralph Alskog is and at all times
12 material hereto was one of the deacons of the Defendant,
13 Community Chapel and Bible Training Center.

14 2.4 Defendant Ralph Alskog served as a counselor for
15 the Defendant, Community Chapel and Bible Training Center.

16 2.5 All actions described of Defendants Alskog or
17 either of them were performed on behalf of the marital
18 community.

19 III. DEFENDANTS: ROBERT AND JANE DOE HOWERTON

20 3.1 The Defendants, Robert Howerton and Jane Doe
21 Howerton, are husband and wife, and at all times material hereto
22 were residents of the County of King, State of Washington.
23 Plaintiffs do not know if Defendant Howerton is married, and if
24 married, does not know his spouse's name, but alleges that if he
25 is married, this constitutes a marital community under the laws
26 of the State of Washington. Each of the acts complained of were
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1 done for and on behalf of the community as well as for and on
2 behalf of the individuals.

3 3.2 Defendant Robert Howerton is a member of the
4 congregation of the Defendant, Community Chapel and Bible
5 Training Center.

6 3.3 Defendant Robert Howerton has taught Sunday School
7 for the Defendant, Community Chapel and Bible Training Center.

8 3.4 Defendant Robert Howerton has held himself out as
9 a counselor and served as a counselor for the Defendant,
10 Community Chapel and Bible Training Center.

11 3.5 Defendant Robert Howerton acted as a counselor for
12 Plaintiff Sybil N. Lemke.

13 IV. DEFENDANTS: E. SCOTT AND JANE DOE HARTLEY

14 4.1 The Defendants, E. Scott Hartley and Jane Doe
15 Hartley, are husband and wife, and at all times material hereto
16 were residents of the County of King, State of Washington.

17 4.2 Defendant E. Scott Hartley is and at all times
18 material hereto has been the corporate secretary and senior
19 staff assistant to the vice president of the Defendant,
20 Community Chapel and Bible Training Center.

21 4.3 Defendant E. Scott Hartley is recognized as one of
22 the four individuals on the Board of Senior Elders of the
23 Defendant, Community Chapel and Bible Training Center.

24 4.4 Defendant E. Scott Hartley served as a counselor
25 for the Defendant, Community Chapel and Bible Training Center.

26 4.5 All actions described of these defendants or either
27 of them were performed on behalf of the marital community.
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1 V. DEFENDANTS: DONALD LEE AND BARBARA BARNETT

2 5.1 The Defendants, Donald Lee Barnett and Barbara
3 Barnett, are husband and wife, and at all times material hereto
4 were residents of the County of King, State of Washington.

5 5.2 Defendant Donald Lee Barnett is the head pastor of
6 the Defendant, Community Chapel and Bible Training Center and as
7 such is responsible for the administration and direction of the
8 entire congregation.

9 5.3 Defendant Donald Lee Barnett is also the president
10 of the Defendant, Community Chapel and Bible Training Center.

11 5.4 Defendant Barbara Barnett, at all times material
12 hereto, served as a counselor for the Community Chapel and Bible
13 Training Center.

14 5.5 All actions described of these defendants or
15 either of them were performed on behalf of the marital
16 community.

17 VI. DEFENDANT: COMMUNITY CHAPEL AND BIBLE TRAINING CENTER

18 6.1 Defendant Community Chapel and Bible Training
19 Center is a corporation licensed to do business and doing
20 business in the State of Washington, having its principle place
21 of business at 18635 Eighth Avenue South, Seattle, Washington.

22 VII. DEFENDANTS: JOHN AND JANE DOES

23 7.1 John and Jane Does 1-4 are residents of the State
24 of Washington. All actions described of these defendants or
25 either of them were performed on behalf of the marital
26 community.

1 VIII. DEFENDANTS: FIRST DOE CORPORATION AND PARTNERSHIP

2 8.1 The Defendants First Doe Corporation and First Doe
3 Partnership are business entities doing business or controlled
4 by the Defendant, Community Chapel and Bible Training Center.
5 Plaintiffs pray leave to amend this complaint for personal
6 injuries and damages and to insert herein their true names when
7 they become known.

8 IX. JURISDICTION

9 9.1 All acts hereinafter alleged occurred within the
10 County of King, State of Washington, and this court has
11 jurisdiction over the subject matter herein and the parties
12 hereto.

13 X. AGENTS, AGENCY AND RESPONDEAT SUPERIOR

14 10.1 At all times material hereto, the Defendants,
15 Ralph Alskog, Rosemary Alskog, Robert Howerton, Jane Doe
16 Howerton, E. Scott Hartley, Jane Doe Hartley, Donald Lee
17 Barnett, Barbara Barnett, "John Does" 1-4 and "Jane Does" 1-4,
18 were principles, agents, employees and representatives of the
19 Community Chapel and Bible Training Center and all actions
20 complained of herein were performed in the scope of their
21 representation, employment and/or agency for the Defendant,
22 Community Chapel and Bible Training Center.

23 10.2 At all times material hereto, the Defendants,
24 First Doe Corporation and First Doe Partnership, were agents,
25 employees and/or representatives of the Defendant, Community
26 Chapel and Bible Training Center and all actions complained of
27 herein were performed in the course of their representation,
28

1 employment and/or agency for the Defendant, Community Chapel and
2 Bible Training Center.

3 XI. BASIS

4 11.1 Sometime during the year of 1967, the Defendant,
5 Community Chapel and Bible Training Center was organized under
6 the laws of the State of Washington as a corporation, practicing
7 fundamentalist pentacostal beliefs. Beginning in 1984 or 1985,
8 Defendant, Community Chapel and Bible Training Center, by and
9 through its pastor and president, Defendant Donald Lee Barnett,
10 encouraged and/or required members of the congregation to form
11 intimate attachments with members of the opposite sex without
12 regard to the member's spouse as part of the regular services at
13 the Community Chapel and Bible Training Center. Said intimate
14 attachments were called "spiritual connections." "Spiritual
15 connections" involve dancing together, embracing, holding hands,
16 hypnotically gazing into each other's eyes, kissing, and/or
17 sexual contact.

18 11.2 Plaintiffs were members of the Defendant the
19 Community Chapel and Bible Training Center religious
20 organization.

21 11.3 Defendant the Community Chapel and Bible Training
22 Center, by and through its pastor, Defendant Donald Lee Barnett,
23 knew or should have known that these intimate attachments and
24 "spiritual connections" would result in seductions, family
25 disharmony, marital instability, separation and/or dissolution
26 of marriages, sexual involvement and advances of adults with
27 children, loss of consortium, destruction of the parent-child
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1 relationship, loss of guidance, support, love and companionship
2 for children.

3 11.4 Defendant, Community Chapel and Bible Training
4 Center, by and through its pastor and president, Defendant
5 Donald Lee Barnett, knew or should have known that its officers,
6 agents, employees, representatives, counselors, and members of
7 the congregation would follow his direction and/or example.

8 XII.

9 12.1 Plaintiffs, Sandy Ehrlich and Michael Ehrlich,
10 regularly attended services at the Defendant, Community Chapel
11 and Bible Training Center for over ten years. As members of the
12 congregation, Plaintiffs attended numerous functions, and were
13 active participants in the congregation. Plaintiff Michael
14 Ehrlich was a bible school teacher employed by the Defendant,
15 Community Chapel and Bible Training Center. Plaintiff Michael
16 Ehrlich held a position as one of the ministerial elders of the
17 Defendant, Community Chapel and Bible Training Center. The
18 Plaintiffs, Sandy Ehrlich and Michael Ehrlich, tithed a portion
19 of their income to the Defendant, Community Chapel and Bible
20 Training Center to help sustain it. The Plaintiffs often
21 volunteered their time to the Defendant, Community Chapel and
22 Bible Training Center. The Plaintiffs' entire life revolved
23 around the activities of the Defendant, Community Chapel and
24 Bible Training Center.

25 12.2 On several occasions, Defendant Ralph Alskog,
26 under the guise of providing ministerial services and counseling
27 as well as serving as Plaintiff Sandy Ehrlich's "spiritual
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1 connection," manipulated, exploited, coerced, influenced and
2 pressured her into having sexual contact with him. Defendant
3 Ralph Alskog professed to be driven by God and represented to
4 Plaintiff Sandy Ehrlich that his conduct was sanctioned by God.

5 12.3 For a period of approximately one year, Defendant
6 Ralph Alskog continued to seek out Plaintiff Sandy Ehrlich,
7 under the guise of being her "spiritual connection," and
8 providing her with ministerial counsel and guidance, continued
9 to sexually assault her, by fondling her private parts,
10 undressing her, kissing her with his tongue, masturbating on her
11 stomach, touching and embracing her against her will.

12 12.4 On numerous occasions Defendant Ralph Alskog,
13 under the guise of providing ministerial services and counseling
14 and serving as the spiritual connection for Sandy Ehrlich,
15 became aware of her vulnerability. As a result of manipulation,
16 exploitation, domination, use of authority and position, and
17 acting under the guise of providing ministerial counseling and
18 serving as a spiritual connection, Plaintiff Sandy Ehrlich was
19 coerced and pressured and unduly influenced into having a
20 spiritual connection and sexual contact with Defendant Ralph
21 Alskog.

22 12.5 Defendant, Community Chapel and Bible Training
23 Center, by and through its pastor and president, Defendant
24 Donald Lee Barnett, and his wife, Barbara Barnett, knew or
25 should have known that Defendant Ralph Alskog was involved in
26 the assault, sexual contact, seduction and exploitation of
27 Plaintiff Sandy Ehrlich. Defendant, Community Chapel and Bible
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1 Training Center, by and through its pastor and president,
2 Defendant Donald Lee Barnett, negligently supervised Defendant
3 Ralph Alskog by not terminating the relationship between Ralph
4 Alskog and Sandy Ehrlich. Defendant, Community Chapel and Bible
5 Training Center, by and through its pastor and president, Donald
6 Lee Barnett, and his wife, Barbara Barnett, knew or should have
7 known that the Defendant Ralph Alskog was causing marital
8 difficulties, family disharmony, marital separation, loss of
9 consortium, between Plaintiffs Sandy Ehrlich and Michael
10 Ehrlich. Defendant, Community Chapel and Bible Training Center,
11 by and through its pastor and president, Defendant Donald Lee
12 Barnett, acted negligently in not supervising Defendant, Ralph
13 Alskog, and in not taking corrective actions, sanctions,
14 preventative measures in ending the relationship between Ralph
15 Alskog and Sandy Ehrlich.

16 12.6 After a period of time, Plaintiffs Sandy Ehrlich
17 and Michael Ehrlich, separately and together, realized that
18 Defendant Ralph Alskog's conduct was not sanctioned by God and
19 was a ruse concocted by Defendants in order to satisfy
20 deviate sexual needs.

21 12.7 On or about May 11, 1986, both Plaintiffs Sandy
22 Ehrlich and Michael Ehrlich were "disfellowshipped" from the
23 Defendant, Community Chapel and Bible Training Center as a
24 consequence of Sandy Ehrlich's refusal to participate in further
25 sexual activities with Defendant Ralph Alskog and/or questioning
26 the "spiritual connection" doctrine and practices of Defendants.
27
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1 12.8 Each and all Defendants have made disparaging and
2 false statements publicly regarding Sandy Ehrlich and Michael
3 Ehrlich to members of the congregation which tended to injure
4 Plaintiffs' reputation in the community.

5 XIII.

6 13.1 The minor child, Sybil N. Lemke, was a member of
7 the Defendant Community Chapel and Bible Training Center at
8 all times material hereto.

9 13.2 As a result of problems Sybil N. Lemke was having
10 stemming from the marital difficulties of her parents, she was
11 directed to begin counseling with Defendant Robert Howerton.

12 13.3 Defendant Robert Howerton counseled Sybil Lemke
13 when she was thirteen and fourteen years old and used to be one
14 of her Sunday school teachers at the Defendant, Community Chapel
15 and Bible Training Center. Defendant Robert Howerton requested
16 Plaintiff Sybil Lemke to be his "spiritual connection."

17 13.4 On several occasions, Defendant Robert Howerton,
18 under the guise of providing ministerial services and
19 counseling, touched and/or rubbed Plaintiff Sybil Lemke on her
20 thighs and legs.

21 13.5 Sometime between September and Christmas Day of
22 1986, Defendant Robert Howerton took Plaintiff Lemke to Redondo
23 Beach in his car. As the sun set, Defendant Howerton moved his
24 car and parked it in the rear of the parking lot. Defendant
25 Robert Howerton told Plaintiff Sybil Lemke that he loved her and
26 pulled her very close to him and started kissing her. Defendant
27 Howerton put one around her and started carressing her buttocks
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1 with his hand. With the other hand Defendant Howerton rubbed
2 Plaintiff Sybil Lemke's thigh. Defendant Robert Howerton was
3 breathing heavily and forcefully kissing Plaintiff Sybil Lemke
4 on her body. Defendant Robert Howerton professed to be driven
5 by God and represented to Plaintiff Sybil Lemke that his conduct
6 was sanctioned by God and was spiritual.

7 13.6 On numerous occasions, Defendant Robert Howerton,
8 under the guise of providing ministerial services and counseling
9 and serving as Plaintiff Sybil Lemke's spiritual connection,
10 became aware of the vulnerability of Plaintiff Sybil Lemke.
11 Defendant Robert Howerton took advantage of her weakness and
12 need for support and manipulated Plaintiff Sybil Lemke.

13 13.7 As a result of manipulation, exploitation, domina-
14 tion, use of authority and position by Defendants, Plaintiff
15 Sybil Lemke was coerced, pressured and unduly influenced into
16 having a spiritual connection and sexual contact with Defendant
17 Robert Howerton.

18 13.8 Defendant, Community Chapel and Bible Training
19 Center, by and through its pastor and president, Defendant
20 Donald Lee Barnett, knew or should have known that Defendant
21 Robert Howerton was involved in the seduction, sexual contact
22 and spiritual connection with Plaintiff Sybil Lemke, a minor.
23 Defendant, the Community Chapel and Bible Training Center, by
24 and through its pastor and president, acted negligently in not
25 supervising Defendant Robert Howerton and in not taking
26 corrective actions, sanctions, preventative measures in ending
27 the relationship between Robert Howerton and Sybil Lemke.
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1 13.9 Defendant, Community Chapel and Bible Training
2 Center, by and through its pastor and president, Defendant
3 Donald Lee Barnett, knew or should have known that Defendant
4 Robert Howerton was causing the destruction of Larry and Sybil
5 Lemke's parent-child relationship, as well as Sybil Lemke's loss
6 of guidance, support, love and companionship for her father.

7 13.10 After a period of time, Plaintiff Sybil Lemke
8 and Plaintiff Larry Lemke, individually and together, realized
9 that Defendants' conduct was not sanctioned by God and was a
10 ruse concocted by Defendants in order to satisfy deviate sexual
11 needs.

12 13.11 Plaintiff Larry Lemke and Sybil Lemke were
13 "disfellowshipped" from Defendant, Community Chapel and Bible
14 Training Center, as a consequence of their refusal to partici-
15 pate in further sexual activities with Defendants and/or chal-
16 lenging the "spiritual connection" doctrine and practices of
17 Defendants.

18 13.12 Defendants have made disparaging and false
19 statements in public regarding Plaintiffs to members of the
20 congregation which tended to injure Plaintiffs' reputation in
21 the community.

22 XIV.

23 14.1 The Plaintiff, Kathryn Reynolds, regularly
24 attended services at the Defendant, Community Chapel and Bible
25 Training Center. As a member of the congregation, Plaintiff
26 Reynolds attended numerous functions of the church, and was an
27 active participant in the congregation. Plaintiff's life
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1 revolved around the activities of the Defendant, Community
2 Chapel and Bible Training Center.

3 14.2 On several occasions, Defendant E. Scott
4 Hartley, under the guise of providing ministerial services and
5 counseling as well as attempting to have a spiritual connection
6 with Plaintiff Reynolds, sexually assaulted her by placing his
7 hands on her breast, and other parts of her body, and forcibly
8 kissing her and embracing her against her will.

9 14.3 On several occasions, Defendant E. Scott
10 Hartley, under the guise of providing ministerial services and
11 counseling as well as attempting to be Plaintiff Reynolds'
12 "spiritual connection," became aware of her vulnerability.
13 Defendant E. Scott Hartley took advantage of her weakness and
14 need for support and manipulated Plaintiff Reynolds.

15 14.4 As a result of manipulation, exploitation,
16 domination, use of authority and position by Defendants,
17 Plaintiff Reynolds was coerced and/or forced into a "spiritual
18 connection" and/or sexual contact with Defendant E. Scott
19 Hartley.

20 14.5 Defendant, the Community Chapel and Bible
21 Training Center, by and through its pastor and president, Donald
22 Lee Barnett, knew or should have known that Defendant E. Scott
23 Hartley was involved in the seduction, sexual contact and
24 attempted spiritual connection with Plaintiff Reynolds.
25 Defendant, Community Chapel and Bible Training Center, by and
26 through its pastor and president, Defendant Donald Lee Barnett,
27 acted negligently in not supervising Defendant, E. Scott Hartley
28

1 and in not taking corrective actions, sanctions, preventative
2 measures in ending the relationship between Defendant E. Scott
3 Hartley and Plaintiff Reynolds.

4 14.6 After a period of time, Plaintiff Reynolds
5 realized that Defendants' conduct was not sanctioned by God and
6 was a ruse concocted by Defendants in order to satisfy deviant
7 sexual needs.

8 14.7 Plaintiff Reynolds was "disfellowshipped"
9 from the Community Chapel and Bible Training Center, as a
10 consequence of her refusal to participate in further sexual
11 contact with Defendant E. Scott Hartley and/or her questioning
12 the "spiritual connection" doctrines and practices of
13 Defendants.

14 14.8 Defendants have made disparaging and false
15 statements publicly regarding Plaintiff Reynolds to members of
16 the congregation which tended to injure Plaintiff's reputation
17 in the community.

18 XV.

19 15.1 The minor children, Shawna Michelle Chabot,
20 Michael Grant Chabot, and Nicholas Sterling Chabot, were members
21 of the Defendant, Community Chapel and Bible Training Center at
22 all times material hereto.

23 15.2 Dee Chabot and her three minor children
24 regularly attended services at the Defendant Community Chapel
25 and Bible Training Center. Dee Chabot has attended such
26 services for approximately fifteen years. Dee Chabot was a
27 member of the congregation and attended numerous functions and
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1 was an active participant in church functions. Plaintiff Chabot
2 was married at Defendant, Community Chapel and Bible Training
3 Center and attended the Bible College on a part-time basis.
4 Plaintiffs, Shawna Michele Chabot and Michael Grant Chabot,
5 attended school at Defendant, Community Chapel and Bible
6 Training Center. Dee Chabot tithed a portion of her income to
7 Defendant, Community Chapel and Bible Training Center, to help
8 sustain it. Plaintiff Chabot volunteered her time to Defendant,
9 Community Chapel and Bible Training Center. Plaintiff Chabot's
10 life and her children's lives revolved around the activities of
11 the Defendant, Community Chapel and Bible Training Center.

12 15.3 Plaintiff Chabot's husband, Grant Brian
13 Chabot, has entered into more than one "spiritual connection"
14 with women members of the church congregation. Plaintiff
15 Chabot, on more than one occasion, sought counsel from members
16 of the Defendant, Community Chapel and Bible Training Center,
17 seeking help to restore her marriage, prevent the break-up of
18 her marriage, and, to put an end to the family disharmony caused
19 by "spiritual connections," to end the loss of consortium she
20 was suffering, to prevent and end the destruction of the parent-
21 child relationships, to prevent and end the loss of companion-
22 ship, love, support and guidance suffered by her children, and
23 to prevent and end the pressures and threats made to her
24 children to enter into "dancing" and/or "spiritual connections"
25 with other children while attending Christian school at
26 Defendant, Community Chapel and Bible Training Center.

1 Plaintiff Chabot was counseled that she had to "release" her
2 husband to other female members of the congregation and allow
3 him to experience "spiritual connections" with said female
4 members of the congregation. Plaintiff Chabot was told by Defen-
5 dants that her failure to accept the "spiritual connections,"
6 the "move of God" and to release her husband meant she was
7 possessed by demons and demonic spirits.

8 15.4 As a result of manipulation, exploitation,
9 domination, use of authority and position by Defendants,
10 Plaintiff Chabot and her children were coerced, pressured and
11 unduly influenced into "dancing" and seeking "spiritual
12 connections."

13 15.5 Defendant, Community Chapel and Bible
14 Training Center, by and through its pastor and president,
15 Defendant Donald Lee Barnett, knew or should have known that
16 Plaintiff's husband was involved in spiritual connections and
17 having sexual contact with other spouses of the congregation,
18 causing family disharmony, marital instability and destruction
19 of the parent-child relationships, and loss of companionship,
20 love, guidance and support for the children.

21 15.6 Defendant, the Community Chapel and Bible
22 Training Center, by and through its pastor and president,
23 Defendant Donald Lee Barnett, acted negligently in not
24 intervening and ending Grant Brian Chabot's spiritual
25 connections with other women and attempting to restore the
26 parent-child relationship of guidance, support and love.
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1 15.7 Plaintiff Dee Chabot was "disfellowshipped"
2 from the Community Chapel and Bible Training Center, as a
3 consequence of her refusal to participate further in "spiritual
4 connections" and/or challenging the "spiritual connections"
5 doctrines and practices of Defendants.

6 15.8 Defendants have made disparaging and false
7 statements to the public regarding Plaintiff Dee Chabot and her
8 children to members of the congregation which tended to injure
9 Plaintiffs' reputation in the community and further erode the
10 parent-child relationship.

11 XVI. DAMAGES

12 16.1 Plaintiffs incorporate by reference as if set
13 forth in full each and every allegation as set forth in
14 paragraphs I through XV.

15 16.2 As a direct and proximate result of the
16 intentional, reckless, and/or negligent wrongful acts and
17 omissions of the Defendants, and each of them, Plaintiffs have
18 suffered serious and painful injuries to their person, as well
19 as psychological and mental pain and suffering. By reason of
20 the foregoing, Plaintiffs sustained general damages according to
21 proof.

22 16.3 As a direct and proximate result of the
23 intentional, reckless, and/or negligent wrongful acts and
24 omissions of the Defendants, and each of them, Plaintiff was
25 required to and did incur reasonable and necessary expenses in
26 connection with the treatment of said personal injuries. By
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1 reason of the foregoing, Plaintiff sustained special damages
2 according to proof.

3 16.4 As a direct and proximate result of the
4 intentional, reckless, and/or negligent wrongful acts and
5 omissions of the Defendants, and each of them, Plaintiff will be
6 required to and incur in the future reasonable and necessary
7 expenses in connection with the treatment of said personal
8 injuries. By reason of the foregoing, Plaintiff will sustain
9 additional special damages according to proof.

10 16.5 As a direct and proximate result of the
11 intentional, reckless, and/or negligent wrongful acts and
12 omissions of the Defendants, and each of them, Plaintiff has
13 suffered a loss of earnings to date in an amount which is
14 presently unknown but which will be proven at the time of trial.

15 16.6 As a direct and proximate result of the
16 intentional, reckless, and/or negligent wrongful acts and
17 omissions of the Defendants, and each of them, Plaintiff is
18 entitled to actual damages, damages for continuing pain and
19 suffering, and attorney fees and costs under the laws of the
20 United States of America and the State of Washington.

21 XVII.

22 FIRST CAUSE OF ACTION: OUTRAGE

23 17.1 Plaintiffs hereby incorporate by reference
24 each and every allegation as set forth in paragraphs I through
25 XVI.
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1 17.2 The acts of each of the Defendants as stated
2 above are so extreme, outrageous and go beyond all bounds of
3 decency.

4 17.3 The conduct of each of the above-named
5 Defendants was so extreme and outrageous that it caused the
6 Plaintiffs to suffer severe emotional distress.

7 17.4 The conduct of Defendants was perpetrated so
8 as to intentionally inflict severe emotional distress upon
9 Plaintiffs, with knowledge that such distress was certain or
10 substantially certain to result from such outrageous conduct.

11 17.5 Defendants' conduct was perpetrated with
12 reckless and deliberate disregard of a high degree of
13 probability that severe emotional distress would result to
14 Plaintiffs.

15 17.6 The conduct of Defendants was deliberate,
16 willful, malicious, and calculated to inflict severe emotional
17 distress on Plaintiffs.

18 17.7 As a direct and proximate result of
19 Defendants' outrageous conduct, Plaintiff suffered severe
20 emotional distress, were greatly humiliated, shamed,
21 embarrassed, defamed, and endured great pain and suffering.

22 XVIII.

23 SECOND CAUSE OF ACTION: COUNSELOR MALPRACTICE

24 18.1 Plaintiffs incorporate by reference each and
25 every allegation as set forth in paragraphs I through XVII.

26 18.2 Defendant, Community Chapel and Bible
27 Training Center, by and through its pastor and president,
28

1 Defendant Donald Lee Barnett, and other Defendants, did not
2 exercise the degree of care, skill, diligence and knowledge
3 commonly possessed and exercised by a reasonable, careful and
4 prudent counselor in this jurisdiction by manipulating
5 Plaintiffs into having a spiritual connection and/or sexual
6 contact with Defendants. Defendant, the Community Chapel and
7 Bible Training Center, by and through its pastor and president,
8 Defendant Donald Lee Barnett, and other Defendants, acted
9 intentionally, recklessly, and/or negligently in its conduct
10 and/or omissions and this constituted the tort of counselor
11 malpractice.

12 18.3 Defendant Ralph Alskog did not exercise the
13 degree of care, skill, diligence and knowledge commonly
14 possessed and exercised by a reasonable, careful and prudent
15 counselor in this jurisdiction by manipulating Plaintiff Sandy
16 Ehrlich into having a "spiritual connection" and/or sexual
17 contact. Defendant Ralph Alskog acted intentionally,
18 recklessly, and/or negligently in his acts and/or omissions and
19 this constituted the tort of counselor malpractice.

20 18.4 Defendant Robert Howerton did not exercise
21 the degree of care, skill, diligence and knowledge commonly
22 possessed and exercised by a reasonable, careful and prudent
23 counselor in this jurisdiction by manipulating a minor,
24 Plaintiff Sybil Lemke, into a "spiritual connection" and/or
25 sexual contact. Defendant Robert Howerton did intentionally,
26 recklessly, and/or negligently commit acts and/or omissions
27 which constituted the tort of counselor malpractice.
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1 18.5 Defendant E. Scott Hartley did not exercise
2 the degree of care, skill, diligence and knowledge commonly
3 possessed and exercised by a reasonable, careful and prudent
4 counselor in this jurisdiction by manipulating Plaintiff Kathryn
5 Reynolds into a spiritual connection and/or sexual contact.
6 Defendant E. Scott Hartley did intentionally, recklessly, and/or
7 negligently commit acts and/or omissions which constituted the
8 tort of counselor malpractice.

9 18.6 Defendants, the Community Chapel and Bible
10 Training Center, by and through its pastor and president,
11 Defendant Donald Lee Barnett, along with all other Defendants,
12 did not exercise the degree of care, skill, diligence and
13 knowledge commonly possessed and exercised by a reasonable,
14 careful and prudent counselor in this jurisdiction by telling
15 Plaintiff Dee Chabot that she should "release" her husband to
16 other member(s) of the congregation; by telling Plaintiff Dee
17 Chabot that her failure to "release" her husband to having
18 spiritual connection with another member of the congregation
19 meant she was possessed by demonic spirits, and by failing to
20 intervene and help restore marital harmony, parent-child
21 relationships and the loss of love, guidance, companionship and
22 support for her children. These Defendants did intentionally,
23 recklessly, and/or negligently commit acts and/or omissions
24 which constituted the tort of counselor malpractice.

25 18.7 As a direct and proximate result of
26 Defendants' malpractice, each Plaintiff has sustained severe
27 pain and suffering.
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XIX.

THIRD CAUSE OF ACTION: NEGLIGENT COUNSELING

19.1 Plaintiff incorporates by reference each and every allegation as set forth in paragraphs I through XVIII.

19.2 Defendants held themselves out to Plaintiffs as being capable of performing family counseling, marital counseling and spiritual counseling, which requires the skill of a person competent to counsel the Plaintiffs in their respective needs.

19.3 Defendants were negligent in counseling Plaintiffs in that Defendants failed to exercise or possess that degree of skill, care, and learning ordinarily exercised or possessed by the average qualified counselor, taking into account the existing state of knowledge and practice in the field of clergy, marital counseling, and other counseling professions. Defendants negligently violated the duty of care as a counselor by either having sexual contact with Plaintiffs or entering into "spiritual connections" with Plaintiffs or failing to assist Plaintiffs in restoring marital harmony, family harmony, preventing loss of consortium between spouses, putting an end to the destruction of the parent-child relationship and ending the loss of guidance, love, support and companionship suffered by minors-Plaintiffs.

19.4 As a direct and proximate result of Defendants' negligent counseling, each Plaintiff sustained severe pain and suffering.

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XX.

FOURTH CAUSE OF ACTION:

PASTORAL AND MINISTERIAL MALPRACTICE

20.1 Plaintiffs incorporate by reference each and every allegation as set forth in paragraphs I through XIX.

20.2 Defendant, Community Chapel and Bible Training Center, by and through its pastor and president, Defendant Donald Lee Barnett, intentionally, recklessly, and/or negligently failed to exercise that degree of care, skill, diligence and knowledge commonly possessed and exercised by a reasonable, careful and prudent pastor/minister in this jurisdiction. This intentional, reckless, negligent act and/or omission constitutes the tort of pastoral/ministerial malpractice.

20.3 Defendants intentionally, recklessly, and/or negligently failed to exercise that degree of care, skill, diligence and knowledge commonly possessed and exercised by a reasonable, careful and prudent minister in this jurisdiction. This intentional, reckless, negligent act and/or omission constitutes the tort of pastoral/ministerial malpractice.

20.4 As a direct and proximate result of Defendants' negligent counseling, each Plaintiff sustained severe pain and suffering.

XXI.

FIFTH CAUSE OF ACTION; SEXUAL ASSAULT AND BATTERY

21.1 Plaintiff Sandy Ehrlich incorporates by reference each and every allegation as set forth in paragraphs I

1 through XX. The offensive sexual contact and touching by
2 Defendant, Ralph Alskog, against the will and body of Plaintiff,
3 Sandy Ehrlich, resulted in personal injuries to her and
4 constitutes constitutes the torts of assault, battery and false
5 imprisonment.

6 21.2 Plaintiff Sybil Lemke incorporates by
7 reference each and every allegation as set forth in paragraphs I
8 through XX. The offensive sexual contact and touching by Defen-
9 dant, Robert Howerton, against the will and body of Plaintiff,
10 Sybil Lemke, resulted in personal injuries to her and consti-
11 tuted the torts of assault, battery and false imprisonment.

12 21.3 Plaintiff Kathryn Reynolds incorporates by
13 reference each and every allegation as set forth in paragraphs I
14 through XX. The offensive sexual contact and touching by Defen-
15 dant, E. Scott Hartley, against the will and body of Plaintiff,
16 Kathryn Reynolds, resulted in personal injuries to her and
17 constituted the torts of assault, battery and false
18 imprisonment.

19 XXII.

20 SIXTH CAUSE OF ACTION: DEFAMATION

21 22.1 Plaintiffs incorporate by reference each and
22 every allegation set forth in paragraphs I through XXI.

23 22.2 As a direct and proximate result of acts
24 and/or omissions of Defendants in making disparaging and false
25 statements publicly regarding respective Plaintiffs, each and
26 every Plaintiff's reputation was damaged and constitutes the
27 tort of defamation.
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1 XXIII.

2 SEVENTH CAUSE OF ACTION: LOSS OF CONSORTIUM

3 23.1 Plaintiffs Sandy and Michael Ehrlich
4 incorporate by reference each and every allegation as set forth
5 in paragraphs I through XXII.

6 23.2 As a direct and proximate result of the acts
7 and/or omissions of Defendants, Plaintiff Michael Ehrlich has
8 suffered a loss of consortium, including without limitation
9 thereto, the loss of love, affections, care, services,
10 companionship and society of his wife, Sandy Ehrlich.

11 23.3 As a direct and proximate result of the acts
12 and/or omissions of Defendants, Plaintiff Sandy Ehrlich has
13 suffered a loss of consortium, including without limitation
14 thereto, the loss of love, affections, care, services,
15 companionship and society of her husband, Michael Ehrlich.

16 XXIV

17 EIGHTH CAUSE OF ACTION:

18 DESTRUCTION OF PARENT-CHILD RELATIONSHIP

19 24.1 Plaintiffs Larry Lemke and Dee Chabot
20 incorporate by reference each and every allegation as set forth
21 in paragraphs I through XXIII.

22 24.2 As a direct and proximate result of the acts
23 and/or omissions of Defendants, Plaintiffs, Larry Lemke and Dee
24 Chabot, suffered the loss of love and companionship and injury
25 to and destruction of the parent-child relationship.
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1 XXV.

2 NINTH CAUSE OF ACTION:

3 CHILDREN'S LOSS OF CONSORTIUM

4 25.1 Plaintiffs Sybil Lemke, Shawna Michele
5 Chabot, Michael Grant Chabot, and Nicholas Sterling Chabot,
6 minors, incorporate by reference each and every allegation
7 contained in paragraphs I through XXIV.

8 25.2 As a direct and proximate result of the acts
9 and/or omissions of Defendants, Plaintiffs Sybil Lemke, Shawna
10 Michele Chabot, Michael Grant Chabot, and Nicholas Sterling
11 Chabot, minors, suffered the loss of love, care, companionship,
12 and guidance of their respective Plaintiff-parent.

13 XXVI.

14 TENTH CAUSE OF ACTION: WRONGFUL DISFELLOWSHIPMENT

15 26.1 Plaintiffs incorporate by reference each and
16 every allegation contained in paragraphs I through XXV.

17 26.2 Defendant, Community Chapel and Bible
18 Training Center, by and through its pastor and president, Donald
19 Lee Barnett, had knowledge of Defendants' conduct towards
20 Plaintiffs and failed to take corrective actions, sanctions,
21 preventative measures, or in any way to prevent Plaintiffs from
22 being disfellowshipped.

23 26.3 Plaintiffs' questioning and/or challenging
24 the "spiritual connections" doctrine and practices of Defendant,
25 Community Chapel and Bible Training Center, by and through its
26 pastor and president, Defendant Donald Lee Barnett, led to their
27

1 disfellowshipment from Defendant, Community Chapel and Bible
2 Training Center.

3 26.4 As a direct and proximate result of being
4 "disfellowshipped" from Defendant, Community Chapel and Bible
5 Training Center, Plaintiffs were ostracized from their peers,
6 barred from attending church services, members of the
7 congregation were directed not to have further contact with
8 respective Plaintiffs, and endured severe pain and suffering.

9 26.5 As a further direct and proximate result of
10 Plaintiffs' wrongful disfellowshipment, each of the Plaintiffs
11 have been shunned by members of the Community Chapel and Bible
12 Training Center, lost their jobs, have been greatly humiliated,
13 lost their friends, shamed, embarrassed and endured great
14 suffering and remain nervous and distraught.

15 XXVII.

16 ELEVENTH CAUSE OF ACTION: SEDUCTION OF CHILD

17 27.1 Plaintiffs, Larry Lemke and Sybil Lemke,
18 incorporate by reference each and every allegation contained in
19 paragraphs I-XXVI.

20 27.2 As a direct and proximate result of the offensive
21 sexual contact and touching by Defendant, Ralph Alskog, against
22 the will and body of Plaintiff, Sybil Lemke, she suffered
23 personal injuries and this constitutes the tort of seduction of
24 a child.

1 WHEREFORE each and every Plaintiff and together pray
2 for judgment against the Defendants as follows:

- 3 1. For general damages already incurred and future
4 general damages in an amount unknown but which
5 will be proved at the time of trial;
6 2. For medical expenses incurred and for future
7 medical expenses and other costs, in an amount
8 unknown which will be proved at the time of trial.
9 3. For loss of wages and earnings which will be
10 proved at the time of trial;
11 4. For costs and disbursements;
12 5. For prejudgment interest;
13 6. For reasonable attorney fees;
14 7. For injunctive relief;
15 8. For such other relief as this court may deem just
16 and proper in this cause.

17 WHEREFORE Plaintiffs Michael and Sandy Ehrlich further
18 pray for judgment against the Defendants as follows:

- 19 10. For loss of consortium;

20 WHEREFORE Plaintiffs Larry Lemke and Dee Chabot further
21 pray for judgment against the Defendants as follows:

- 22 11. For loss of parent-child relationship;

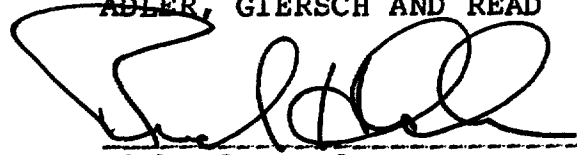
23 WHEREFORE Plaintiffs Sybil Lemke, Shawna Michele
24 Chabot, Michael Grant Chabot and Nicholas Sterling Chabot,
25 minors, further pray for judgment against the Defendants as
26 follows:
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12. For loss of parental consortium, love, support,
guidance and companionship.

DATED this 31st day of July, 1986.

ADLER, GIERSCH AND READ



Richard H. Adler
Attorney for Plaintiffs

AUG 18 1986
ADLER, ... & HEAD, P.S.

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

SANDY EHRLICH and MICHAEL EHRLICH, wife and husband; LARRY LEMKE, parent; LARRY LEMKE, Guardian ad Litem on behalf of SYBIL N. LEMKE, a minor; KATHRYN REYNOLDS; DEE CHABOT, parent; DEE CHABOT, Guardian ad Litem on behalf of SHAWNA MICHELLE CHABOT, MICHAEL GRANT CHABOT, NICHOLAS STERLING CHABOT, minors,

Plaintiffs,

-vs-

RALPH ALSKOG and ROSEMARY ALSKOG, husband and wife; ROBERT HOWERTON and JANE DOE HOWERTON, husband and wife; E. SCOTT HARTLEY and JANE DOE HARTLEY; DONALD LEE BARNETT and BARBARA BARNETT, husband and wife; COMMUNITY CHAPEL AND BIBLE TRAINING CENTER, a Washington Corporation; et al.,

Defendants.

AUG 18 PM 4 28

NO. 86-2-18429-5
SEATTLE, WA

NOTICE OF APPEARANCE ON BEHALF OF DEFENDANTS ALSKOG; HOWERTON; HARTLEY; BARNETT; COMMUNITY CHAPEL AND BIBLE TRAINING CENTER

TO: PLAINTIFFS, and

TO: RICHARD H. ADLER, Attorney for Plaintiffs:

PLEASE TAKE NOTICE that RALPH ALSKOG, ET UX.; ROBERT HOWERTON, ET UX.; E. SCOTT HARTLEY, ET UX.; DONALD LEE BARNETT, ET UX., COMMUNITY CHAPEL AND BIBLE TRAINING CENTER, defendants, without waiving objection

as to improper service or jurisdiction, enter their appearance by their undersigned attorneys, and service of all pleadings, notices, documents or other papers, exclusive of process, may be had upon said defendants by serving the undersigned attorneys at their address below stated.

DATED this 15th day of August, 1986.

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

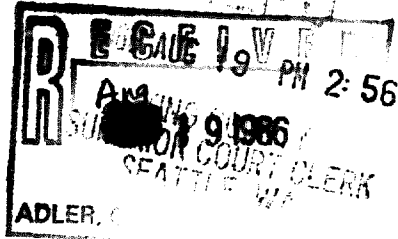
By David L. Martin
David L. Martin

Of Attorneys for All Defendants, except for John Does 1-4; Jane Does 1-4, First Doe Corporation, First Doe Partnership

LEE, SMART, COOK, MARTIN & PATTERSON, P.S., INC.
ATTORNEYS AT LAW
800 WASHINGTON BUILDING
1325 FOURTH AVENUE
SEATTLE, WASHINGTON 98101
(206) 624-7600

Notice of Appearance

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

SANDY EHRLICH and MICHAEL)
EHRLICH, wife and husband;)
LARRY LEMKE, parent; LARRY)
LEMKE, Guardian ad Litem on)
behalf of SYBIL N. LEMKE, a)
minor; KATHRYN REYNOLDS; DEE)
CHABOT, parent; DEE CHABOT,)
Guardian ad Litem on behalf)
of SHAWNA MICHELLE CHABOT,)
MICHAEL GRANT CHABOT, NICHOLAS)
STERLING CHABOT, minors,)

No. 86-2-18429-5
NOTICE OF APPEARANCE

Plaintiffs,

vs.

RALPH ALSKOG and ROSEMARY)
ALSKOG, husband and wife;)
ROBERT HOWERTON and JANE DOE)
HOWERTON, husband and wife;)
E. SCOTT HARTLEY and JANE DOE)
HARTLEY; DONALD LEE BARNETT)
and BARBARA BARNETT, husband)
and wife; COMMUNITY CHAPEL)
AND BIBLE TRAINING CENTER,)
a Washington Corporation;)
"JOHN DOES" 1-4 and "JANE)
DOES" 1-4, husbands and wives;)
FIRST DOE CORPORATION; and)
FIRST DOE PARTNERSHIP,)

Defendants.

TO THE Plaintiffs above named, and
TO Adler, Giersch & Read and Richard Adler, Attorneys of Record:

NOTICE OF APPEARANCE - 1

MOREN, LAGESCHULTE & CORNELL, P.S.
ATTORNEYS AT LAW
ROOSEVELT-PINHURST BUILDING
11320 ROOSEVELT ST. WAY N.E.
SEATTLE, WASHINGTON 98125
12067 365-5500

ORIGINAL

3

1 YOU AND EACH OF YOU WILL PLEASE TAKE NOTICE that RALPH ALSKOG
2 and ROSEMARY ALSKOG, husband and wife, ROBERT HOWERTON and JANE
3 DOE HOWERTON, husband and wife, E. SCOTT HARTLEY and JANE DOE
4 HARTLEY, husband and wife, DONALD LEE BARNETT and BARBARA
5 BARNETT, husband and wife, COMMUNITY CHAPEL AND BIBLE TRAINING
6 CENTER, "JOHN DOES" 1-4, "JANE DOES" 1-4, FIRST DOE CORPORATION
7 and FIRST DOE PARTNERSHIP hereby appear in the above entitled
8 cause by the undersigned associated Attorneys and request that
9 all further papers and pleadings herein, except original process,
10 be served upon the undersigned associated Attorneys at their
11 addresses below stated.

12 LEE, SMART, COOK, MARTIN &
13 PATTERSON, P.S.

14 By: Michael J. Bond
15 MICHAEL J. BOND
16 Attorneys for Defendants
17 800 Washington Bldg.
18 Seattle, WA 98101
19 (206) 624-7990

MOREN, LAGESCHULTE & CORNELL, P.S.

20 By: Michael W. Bugni
21 MICHAEL W. BUGNI
22 Attorneys for Defendants
23 11320 Roosevelt Way N.E.
24 Seattle, Washington 98133
25 Phone: (206) 365-5500



SUPERIOR COURT OF WASHINGTON
COUNTY OF KING

Comm Chapel

vs.

Plaintiff(s)

Defendant(s)

FILED
NOV 18 PM 2:58
NOV 18 2:58 PM '86
SUPERIOR COURT
COUNTY OF KING
2-2-86429-5

ORDER AUTHORIZING REMOVAL OF COURT FILE

IT IS ORDERED that:

Name:

PAT CHART

Address:

13727 NE 11th St.
Bellevue WA 98005

Telephone No.:

206 644 9771

is authorized to remove from the Clerk's Office the file in the above entitled matter for a period of 2 days.

Dated:

11/17/86

994-2560
DISPLAY BEEPER
TYPE IN YOUR NUMBER
AND PUSH in Parent Sign
at end of
your number
[Signature]
Judge/Court Commissioner/
Approving Authority

Presented by:

[Signature]

COURT COMMISSIONER PRO TEM

Rec'd 11/17/86

[Signature]

EXPOI

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RECEIVED

NOV 24 1986

In the Superior Court of the State of Washington,

NOV 25 1986

MOREN,
LAGESCHULTE & CORNELL, P.S.

In and For the County of KING

ADLER, GIBSON

001

SANDY EHRLICH and MICHAEL EHRLICH,
et al.,

No. 86-2-18429-5

Plaintiff

NOTICE OF ORAL EXAMINATION

v.

RALPH ALSKOG, et ux., et al

Defendant

FILED BEFORE TRIAL

IN COUNTY CLERKS OFFICE
A.M. DEC - 3 1986 P.M.

PIERCE COUNTY WASHINGTON
TED RUFF, County Clerk

To: All Parties of Record By DEPUTY

RECORDED
12-1-86

and to: Their Respective Attorneys

YOU, AND EACH OF YOU, WILL PLEASE TAKE NOTICE that the testimony of
LARRY LEMKE, the plaintiff above named will be
taken on Oral Examination Before Trial at the instance and request of the defendants in the
above entitled and numbered action, before Ernest H. Yamaguchi, Notary Public, or some other
Notary Public at 800 Washington Building, Fourth & Union Street (Conf. Room #2)
Seattle, Washington, on Tuesday, the 10th day of December,
1986, commencing at the hour of 9:30 o'clock, A.M., on that day; the said Oral Examination
of said witness at said time and place to be subject to continuance or adjournment from time to time or
place to place until completed.

This testimony upon oral examination will be taken on the ground and for the reason the said
person is a party to or a witness in the above entitled action, and will give evidence material to
the establishment of the defendants' case.

DATED this 21st day of November, 1986

Michael J. Bond
MICHAEL J. BOND
Attorneys for Howerton

Office and Post Office Address:

800 Washington Building
Seattle, Washington.

624-7990

ERNEST H. YAMAGUCHI
COURT REPORTER
408 CENTRAL BUILDING
SEATTLE, WASHINGTON

6/1

RECEIVED

NOV 24 1986

In the Superior Court of the State of Washington,

RECEIVED
NOV 25 1986
KING

MOREN,
LAGESCHULTE & CORNELL, P.S.

In and For the County of

OR

SANDY EHRLICH and MICHAEL EHRLICH,
et al.,

No. 86-2-18429-5

Plaintiff

NOTICE OF ORAL EXAMINATION
BEFORE TRIAL

v.

RALPH ALSKOG, et ux., et al

Defendant

FILED
IN COUNTY CLERK'S OFFICE
A.M. DEC-3 1986 P.M.
PIERCE COUNTY, WASHINGTON
TED RUTT, County Clerk
DEPUTY

To: All Parties of Record

and to: Their Respective Attorneys

YOU, AND EACH OF YOU, WILL PLEASE TAKE NOTICE that the testimony of
SYBIL LEMKE, the plaintiff above named will be
taken on Oral Examination Before Trial at the instance and request of the defendants in the
above entitled and numbered action, before Ernest H. Yamaguchi, Notary Public, or some other
Notary Public at 800 Washington Building, Fourth & Union Street (Conf. Room #2)
Seattle, Washington, on Tuesday, the 9th day of December,
1986, commencing at the hour of 9:30 o'clock, A.M., on that day; the said Oral Examination
of said witness at said time and place to be subject to continuance or adjournment from time to time or
place to place until completed.

This testimony upon oral examination will be taken on the ground and for the reason the said
person is a party to or a witness in the above entitled action, and will give evidence material to
the establishment of the defendants' case.

DATED this 21st day of November, 1986.

Michael J. Bond
MICHAEL J. BOND
Attorneys for Howerton

Office and Post Office Address:
800 Washington Building
Seattle, Washington.
624-7990

ERNEST H. YAMAGUCHI
COURT REPORTER
408 CENTRAL BUILDING
SEATTLE, WASHINGTON

In the Superior Court of the State of Washington,

In and For the County of KING

ORIGINAL

SANDY EHRLICH and MICHAEL EHRLICH, et al.,

KING COUNTY SUPERIOR COURT Plaintiff

v.

RALPH ALSKOG, et ux., et al.,

Defendant

No. 86-2-18429-5

AMENDED NOTICE OF ORAL EXAMINATION

BEFORE TRIAL

(Previously scheduled for December 9, 1986)

To: All Parties of Record

and to: Their Respective Attorneys

YOU, AND EACH OF YOU, WILL PLEASE TAKE NOTICE that the testimony of SYBIL LEMKE, the Plaintiff above named will be taken on Oral Examination Before Trial at the instance and request of the defendants in the above entitled and numbered action, before Ernest H. Yamaguchi, Notary Public, or some other Notary Public at Roosevelt-Pinehurst Building, 11320 Roosevelt Way N.E., Seattle, Washington, on Friday, the 19th day of December 19 86, commencing at the hour of 1:00 o'clock, P.M., on that day; the said Oral Examination of said witness at said time and place to be subject to continuance or adjournment from time to time or place to place until completed.

This testimony upon oral examination will be taken on the ground and for the reason the said person is a party to or a witness in the above entitled action, and will give evidence material to the establishment of the defendants' case.

DATED this 8th day of December, 19 86.

Michael J. Bond

MICHAEL J. BOND

STATE OF WASHINGTON Defendants AFFIDAVIT COUNTY OF KING Attorneys for OF MAILING

Office and Post Office Address:

800 Washington Building Seattle, Washington.

The undersigned, being first duly sworn, on oath, states: That on this day I deposited in the mails of the United States of America a properly stamped and addressed envelope directed to the attorneys of record of all parties, containing a copy of the document to which this affidavit is attached.

Subscribed and sworn to before me this 8th day of

YAMAGUCHI & ASSOCIATES

Court Reporters 408 Central Building Seattle, WA 98104 206-622-6875

My appointment expires 10-15-90

5.5

In the Superior Court of the State of Washington,

In and For the County of KING

SANDY EHRLICH and MICHAEL EHRLICH, et al.,
Plaintiff

v.
RALPH ALSKOG, et ux., et al.,
Defendant

AMENDED No. 86-2-18429-5
NOTICE OF ORAL EXAMINATION

BEFORE TRIAL
(Previously scheduled for
December 10, 1986)

FILED
DEC 4 1986
AM 11:52
ORIGINAL

To: All Parties of Record

and to: Their Respective Attorneys

YOU, AND EACH OF YOU, WILL PLEASE TAKE NOTICE that the testimony of LARRY LEMKE, the Plaintiff above named will be taken on Oral Examination Before Trial at the instance and request of the defendants in the above entitled and numbered action, before Ernest H. Yamaguchi, Notary Public, or some other Notary Public at Roosevelt-Pinehurst Building, 11320 Roosevelt Way N.E., Seattle, Washington, on Friday, the 19th day of December 19 86, commencing at the hour of 3:00 o'clock, P.M., on that day; the said Oral Examination of said witness at said time and place to be subject to continuance or adjournment from time to time or place to place until completed.

This testimony upon oral examination will be taken on the ground and for the reason the said person is a party to or a witness in the above entitled action, and will give evidence material to the establishment of the defendants' case.

DATED this 8th day of December, 19 86.

Michael J. Bond
MICHAEL J. BOND
STATE OF WASHINGTON
COUNTY OF KING
Attorneys for Defendants
AFFIDAVIT OF MAILING

Office and Post Office Address:
800 Washington Building
Seattle, Washington.

The undersigned, being first duly sworn, on oath, states: That on this day I deposited in the mails of the United States of America a properly stamped and addressed envelope directed to the attorneys of record of all parties, containing a copy of the document to which this affidavit is attached.

Ernest H. Yamaguchi
Subscribed and sworn to before me this 8th day of

YAMAGUCHI & ASSOCIATES
Court Reporters
408 Central Building
Seattle, WA 98104
206-622-6875

December 19 86
Notary Public in and for the State of Washington, Seattle
My appointment expires 10-15-90

In the Superior Court of the State of Washington,

In and For the County of KING

SANDY EHRLICH and MICHAEL EHRLICH, et al.,

KING COUNTY SUPERIOR COURT v. SEATTLE

RALPH ALSKOG, et ux., et al.,

Plaintiff Defendant

No. 86-2-18429-5

NOTICE OF ORAL EXAMINATION BEFORE TRIAL

The undersigned, a Notary Public, do hereby, on oath, state: That on this day I deposited in the mails of the United States of America a properly stamped and addressed envelope directed to the attorneys of record of all parties, containing a copy of the document to which this affidavit is attached.

Notar

Sharon J. ...

Subscribed and sworn to before me this 8th day of

December 1986

Notary Public in and for the State of Washington, Seattle

My appointment expires 10-15-90

To: All Parties of Record

and to: Their Respective Attorneys

YOU, AND EACH OF YOU, WILL PLEASE TAKE NOTICE that the testimony of Kathryn Reynolds, the Plaintiff above named will be taken on Oral Examination Before Trial at the instance and request of the defendants in the above entitled and numbered action, before Ernest H. Yamaguchi, Notary Public, or some other Notary Public at Roosevelt-Pinehurst Building, 11320 Roosevelt Way N.E., Seattle, Washington, on Friday, the 19th day of December 1986, commencing at the hour of 4:00 o'clock, P.M., on that day; the said Oral Examination of said witness at said time and place to be subject to continuance or adjournment from time to time or place to place until completed.

This testimony upon oral examination will be taken on the ground and for the reason the said person is a party to or a witness in the above entitled action, and will give evidence material to the establishment of the defendants' case.

DATED this 8th day of December, 1986.

Michael J. Bond

MICHAEL J. BOND

Attorneys for Defendants

Office and Post Office Address:

800 Washington Building Seattle, Washington.

YAMAGUCHI & ASSOCIATES Court Reporters 408 Central Building Seattle, WA 98104 206-622-6875

ORIGINAL

RECEIVED

DEC 11 1986

FILED

DEC 11 1986 MOREN, LAGESCHULTE & CORP



SUPERIOR COURT OF WASHINGTON
COUNTY OF KING

SANDY EHRLICH, et al.,
Plaintiffs
v.
RALPH ALSKOG et al.,
Defendants

NO. 86-2-18429-5

NOTE FOR CIVIL MOTION CALENDAR
(Clerk's Action Required)

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

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 Civil Motion Calendar.

DATE OF HEARING: Friday / 12-19-86
(Day of Week) (Calendar Date)

TIME OF HEARING: [X] 9:30 a.m. [] 1:30 p.m.
[] Summary Judgments [] Supplemental Proceedings
[X] Civil Motions

PLACE OF HEARING: E942

NATURE OF MOTION: Motion for Default

DATED: 12/10/86

Typed Name: Richard H. Adler

OF: Adler, Giersch & Read, P.S.

Attorney For: Plaintiffs

Phone: 682-4267

OTHER PARTIES REQUIRING NOTICE:
Fill In & Check Box If Backside Is Used []

Name: Michael F. Bond Name: Michael W. Bugni

Address: 800 Washington Bldg. Address: 11320 Roosevelt Way N.E.

Seattle, WA 98101 Seattle, WA 98133

Phone: 624-7990 Phone: 365-5500

Attorney For: Defendants Attorney For: Defendants

NOTE FOR CIVIL MOTION CALENDAR

LAW OFFICES OF
ADLER, GIERSCHE, AND READ
1211 SMITH TOWER
SEATTLE, WA 98104
(206) 682-4267

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AEES
12/84



SUPERIOR COURT OF WASHINGTON
COUNTY OF KING

FILED
DEC 11 PM 6:20

SANDY EHRLICH, et al.,
Plaintiffs
v.
RALPH ALSKOG et al.,
Defendants

NO. 86-2-18429-5

NOTE FOR CIVIL MOTION CALENDAR
(Clerk's Action Required)

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

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 Civil Motion Calendar.

DATE OF HEARING: Friday / 12-19-86
(Day of Week) (Calendar Date)

TIME OF HEARING: 9:30 a.m. [] 1:30 p.m.
[] Summary Judgments [] Supplemental Proceedings
 Civil Motions

PLACE OF HEARING: E942

NATURE OF MOTION: Motion for Default

DATED: 12/10/86

Typed Name: Richard H. Adler

OF: Adler, Giersch & Read, P.S.

Attorney For: Plaintiffs

Phone: 682-4267

OTHER PARTIES REQUIRING NOTICE:

Fill In & Check Box If Backside Is Used []

Name: Michael F. Bond Name: Michael W. Bugni

Address: 800 Washington Bldg. Address: 11320 Roosevelt Way N.E.

Seattle, WA 98101 Seattle, WA 98133

Phone: 624-7990 Phone: 365-5500

Attorney For: Defendants Attorney For: Defendants

NOTE FOR CIVIL MOTION CALENDAR

LAW OFFICES OF
ADLER, GIERSCH, AND READ
1211 SMITH TOWER
SEATTLE, WA 98104
(206) 682-4267

AEES
12/84

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FILED
DEC 11 PM 10:20
KING COUNTY
SUPERIOR COURT

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

SANDY EHRLICH, et al.,
Plaintiffs,
v.
RALPH ALSKOG, et al.,
Defendants.

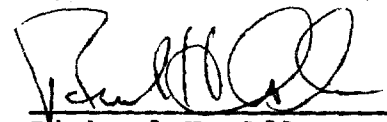
NO. 86-2-18429-5
MOTION AND DECLARATION
FOR DEFAULT

COME NOW the Plaintiffs in the above-entitled case and
move the Court for an Order of Default in this action.

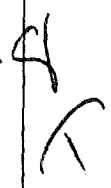
THIS MOTION is based upon the files and records herein,
and the attached declaration of Richard H. Adler, attorney for
Plaintiff.

DATED this 10th day of December, 1986.

ADLER, GIERSCH AND READ



Richard H. Adler
Attorney for Plaintiff



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DECLARATION

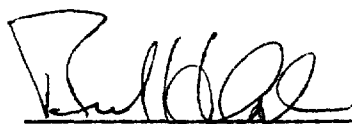
Richard H. Adler declares and says:

I am the attorney of record for the Plaintiff in the above-entitled cause. The Summons and Complaint for Personal Injury was filed with the King County Superior Court Clerk's Office on July 31, 1986. The Defendants were personally served on July 31, 1986. An Affidavit of Service is on file with the clerk's office. Defendants' answer was due 20 days later on August 20, 1986, pursuant to CR 15(a).

Declarant received a Notice of Appearance from Defendants' counsel on August 18, 1986 and August 19, 1986. To my knowledge, no answer has been filed and the Defendants are in default.

I DECLARE UNDER PENALTY OF PERJURY UNDER THE LAWS OF THE STATE OF WASHINGTON THAT THE FOREGOING IS TRUE AND CORRECT.

DATED at Seattle, Washington this 10th day of December, 1986.



Richard H. Adler
Attorney for Plaintiff(s)

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RECEIVED
DEC 12 1986
DEC 12 1986

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

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SANDY EHRLICH and MICHAEL)
EHRLICH, wife and husband;)
LARRY LEMKE, parent; LARRY)
LEMKE, Guardian ad Litem on)
behalf of SYBIL N. LEMKE, a)
minor; KATHRYN REYNOLDS; DEE)
CHABOT, parent; DEE CHABOT,)
Guardian ad Litem on behalf)
of SHAWNA MICHELLE CHABOT,)
MICHAEL GRANT CHABOT, NICHOLAS)
STERLING CHABOT, minors,)

No. 86-2-18429-5

ANSWER AND COUNTERCLAIM

Plaintiffs,

vs.

RALPH ALSKOG and ROSEMARY)
ALSKOG, husband and wife;)
ROBERT HOWERTON and JANE DOE)
HOWERTON, husband and wife;)
E. SCOTT HARTLEY and JANE DOE)
HARTLEY; DONALD LEE BARNETT)
and BARBARA BARNETT, husband)
and wife; COMMUNITY CHAPEL)
AND BIBLE TRAINING CENTER,)
a Washington Corporation;)
"JOHN DOES" 1-4 and "JANE)
DOES" 1-4, husbands and wives;)
FIRST DOE CORPORATION; and)
FIRST DOE PARTNERSHIP,)

Defendants.

COME NOW the defendants by and through their attorneys of
record, Michael J. Bond of Lee, Smart, Cook, Martin & Patterson,
P.S., and Michael W. Bugni of Moren, Lageschulte & Cornell, P.S.,
and for answer to plaintiffs' Complaint for Personal Injuries and
Damages in the above-captioned matter, admit, deny and allege as
follows:

ANSWER - 1

ORIGINAL

MOREN, LAGESCHULTE & CORNELL, P.S.
ATTORNEYS AT LAW
ROOSEVELT-PINEHURST BUILDING
11320 ROOSEVELT WAY N.E.
SEATTLE, WASHINGTON 98125
12061 365-5800

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I.

1.1 Defendants admit the allegations contained in paragraph 1.1 of plaintiffs' Complaint.

1.2 Defendants admit the allegations contained in paragraph 1.2 of plaintiffs' Complaint.

1.3 Defendants admit the allegations contained in paragraph 1.3 of plaintiffs' Complaint, although defendants lack any evidence that Larry Lemke has been duly appointed Guardian ad Litem of plaintiff, Sybil N. Lemke, and therefore deny this allegation.

1.4 Defendants admit the allegations contained in paragraph 1.4 of plaintiffs' Complaint.

1.5 Defendants admit the allegations contained in paragraph 1.5 of plaintiffs' Complaint.

1.6 Defendants admit the allegations contained in paragraph 1.6 of plaintiffs' Complaint although defendants lack any evidence that Dee Chabot has been duly appointed Guardian ad Litem of plaintiffs, Shawna Michelle Chabot, Michael Grant Chabot and Nicholas Sterling Chabot, and therefore deny this allegation.

II.

2.1 Defendants admit the allegations contained in paragraph 2.1 of plaintiffs' Complaint.

2.2 Defendants admit the allegations contained in paragraph 2.2 of plaintiffs' Complaint.

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IV.

4.1 Defendants admit the allegations contained in paragraph 4.1 of plaintiffs' Complaint. Defendant E. Scott Hartley's wife is named Bonnie Hartley.

4.2 Defendants admit the allegations contained in paragraph 4.2 of plaintiffs' Complaint.

4.3 Defendants admit the allegations contained in paragraph 4.3 of plaintiffs' Complaint.

4.4 Defendants admit the allegations contained in paragraph 4.4 of plaintiffs' Complaint.

4.5 Defendants deny that the alleged actions of E. Scott Hartley, as described in plaintiff's Complaint, took place, and defendants further deny the allegations contained in paragraph 4.5 of plaintiffs' Complaint.

V.

5.1 Defendants admit the allegations contained in paragraph 5.1 of plaintiffs' Complaint.

5.2 Defendants admit the allegations contained in paragraph 5.2 of plaintiffs' Complaint.

5.3 Defendants admit the allegations contained in paragraph 5.3 of plaintiffs' Complaint.

5.4 Defendants admit the allegations contained in paragraph 5.4 of plaintiffs' Complaint.

5.5 Defendants deny that the alleged actions of Donald Lee Barnett, as described in plaintiff's Complaint, took place, and

1 defendants further deny the allegations contained in paragraph
2 5.5 of plaintiffs' Complaint.

3 VI.

4 6.1 Defendants admit the allegations contained in
5 paragraph 6.1 of plaintiffs' Complaint.

6 VII.

7 7.1 Defendants deny that the alleged actions of John and
8 Jane Does 1-4, as described in plaintiff's Complaint, took place.
9 Defendants lack sufficient information upon which to form a
10 belief as to the truth or falsity of the allegations contained in
11 paragraph 7.1 of plaintiff's Complaint and therefore deny the
12 same.

13 VIII.

14 8.1 Defendants deny the allegations contained in paragraph
15 8.1 of plaintiffs' Complaint.

16 IX.

17 9.1 Defendants deny the allegations contained in paragraph
18 9.1 of plaintiffs' Complaint.

19 X.

20 10.1 Defendants deny the allegations contained in paragraph
21 10.1 of plaintiff's Complaint.

22 10.2 Defendants deny the allegations contained in paragraph
23 10.2 of plaintiffs' Complaint.
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XI.

11.1 Defendants admit the allegations contained in the first sentence of paragraph 11.1 of plaintiffs' Complaint. Defendants deny the remaining allegations contained in paragraph 11.1 of plaintiffs' Complaint because they are an inaccurate, incorrect and/or misleading characterization of defendants' teachings.

11.2 Defendants deny the allegations contained in paragraph 11.2 of plaintiffs' Complaint. The defendant corporation is a non-member corporation.

11.3 Defendants deny the allegations contained in paragraph 11.3 of plaintiffs' Complaint.

11.4 Defendants admit the allegations contained in paragraph 11.4 of plaintiffs' Complaint.

XII.

12.1 Defendants admit the allegations contained in the first four sentences of paragraphs 12.1 of plaintiffs' Complaint, with the qualifications set forth in paragraph 11.2 of this Answer. Regarding the remainder of the allegations contained in paragraph 12.1 of plaintiffs' Complaint, defendants lack sufficient information upon which to form a belief as to the truth or falsity of these allegations and therefore deny the same.

12.2 Defendants deny the allegations contained in paragraph 12.2 of plaintiffs' Complaint.

1 12.3 Defendants deny the allegations contained in paragraph
2 12.3 of plaintiffs' Complaint.

3 12.4 Defendants deny the allegations contained in paragraph
4 12.4 of plaintiffs' Complaint.

5 12.5 Defendants deny the allegations contained in paragraph
6 12.5 of plaintiffs' Complaint.

7 12.6 Defendants deny the allegations contained in paragraph
8 12.6 of plaintiffs' Complaint.

9 12.7 Defendants admit that plaintiffs Sandy Ehrlich and
10 Michael Ehrlich were disfellowshipped from the defendant,
11 Community Chapel and Bible Training Center, on or about May 11,
12 1986, but defendants deny each and every other allegation
13 contained in paragraph 12.7 of plaintiffs' Complaint.

14 12.8 Defendants deny the allegations contained in paragraph
15 12.8 of plaintiffs' Complaint.

16 XIII.

17 13.1 Defendants reallege paragraph 11.2 of this Answer and
18 deny the allegations contained in paragraph 13.1 of plaintiffs'
19 Complaint.

20 13.2 Defendants deny the allegations contained in paragraph
21 13.2 of plaintiffs' Complaint.

22 13.3 Defendants deny the allegations contained in paragraph
23 13.3 of plaintiffs' Complaint, except that defendants admit that
24 Robert Howerton used to be one of Sybil Lemke's Sunday School
25

1 teachers at the defendant, Community Chapel and Bible Training
2 Center.

3 13.4 Defendants deny the allegations contained in paragraph
4 13.4 of plaintiffs' Complaint.

5 13.5 Defendants deny the allegations contained in paragraph
6 13.5 of plaintiffs' Complaint, except that defendants admit that
7 Robert Howerton and Sybil Lemke once drove to Redondo Beach in
8 Robert Howerton's car.

9 13.6 Defendants deny the allegations contained in paragraph
10 13.6 of plaintiffs' Complaint.

11 13.7 Defendants deny the allegations contained in paragraph
12 13.7 of plaintiffs' Complaint.

13 13.8 Defendants deny the allegations contained in paragraph
14 13.8 of plaintiffs' Complaint.

15 13.9 Defendants deny the allegations contained in paragraph
16 13.9 of plaintiffs' Complaint.

17 13.10 Defendants deny the allegations contained in paragraph
18 13.10 of plaintiffs' Complaint.

19 13.11 Defendants admit that plaintiff Larry Lemke was
20 disfellowshipped from the defendant, Community Chapel and Bible
21 Training Center, but defendants deny each and every other
22 allegation contained in paragraph 13.11 of plaintiffs' Complaint.

23 13.12 Defendants deny the allegations contained in paragraph
24 13.12 of plaintiffs' Complaint.
25

XIV.

1
2 14.1 Defendants reallege paragraph 11.2 of this Answer and
3 deny the allegations contained in the first two sentences of
4 paragraph 14.1 of plaintiffs' Complaint. Defendants lack
5 sufficient information upon which to form a belief as to the
6 truth or falsity of the allegations contained in the third
7 sentence of paragraph 14.1 of plaintiffs' Complaint and therefore
8 deny the same.

9 14.2 Defendants deny the allegations contained in paragraph
10 14.2 of plaintiffs' Complaint.

11 14.3 Defendants deny the allegations contained in paragraph
12 14.3 of plaintiffs' Complaint.

13 14.4 Defendants deny the allegations contained in paragraph
14 14.4 of plaintiffs' Complaint.

15 14.5 Defendants deny the allegations contained in paragraph
16 14.5 of plaintiffs' Complaint.

17 14.6 Defendants deny the allegations contained in paragraph
18 14.6 of plaintiffs' Complaint.

19 14.7 Defendants admit that plaintiff Kathryn Reynolds was
20 disfellowshipped from the defendant, Community Chapel and Bible
21 Training Center, but defendants deny each and every other
22 allegation contained in paragraph 14.7 of plaintiffs' Complaint.

23 14.8 Defendants deny the allegations contained in paragraph
24 14.8 of plaintiffs' Complaint.
25

XV.

1
2 15.1 Defendants reallege paragraph 11.2 of this Answer and
3 deny the allegations contained in paragraph 15.1 of plaintiffs'
4 Complaint.

5 15.2 Defendants admit the allegations contained in the
6 first four sentences of paragraph 15.2 of plaintiffs' Complaint,
7 except that defendants allege that Dee Chabot's attendance at
8 Community Chapel was somewhat sporadic with alternating periods
9 of non-attendance, the same being true of her three minor
10 children. Defendants lack sufficient information upon which to
11 form a believe as to the truth or falsity of the remaining
12 allegations contained in paragraph 15.2 of plaintiffs' Complaint
13 and therefore deny the same.

14 15.3 Defendants admit that plaintiff Chabot sought
15 counseling to help restore her marriage and to put an end to
16 family disharmony but defendants deny the remaining allegations
17 contained in paragraph 15.3 of plaintiffs' Complaint.

18 15.4 Defendants deny the allegations contained in paragraph
19 15.4 of plaintiffs' Complaint.

20 15.5 Defendants deny the allegations contained in paragraph
21 15.5 of plaintiffs' Complaint.

22 15.6 Defendants deny the allegations contained in paragraph
23 15.6 of plaintiffs' Complaint.

24 15.7 Defendants admit that plaintiff Dee Chabot was
25 disfellowshipped from the defendant, Community Chapel and Bible

1 Training Center, but defendants deny each and every other
2 allegation contained in paragraph 15.7 of plaintiffs' Complaint.

3 15.8 Defendants deny the allegations contained in paragraph
4 15.8 of plaintiffs' Complaint.

5 XVI.

6 16.1 Defendants incorporate by reference as if set forth in
7 full each and every answer as set forth in paragraphs 1 through
8 15 herein.

9 16.2 Defendants deny the allegations contained in paragraph
10 16.2 of plaintiffs' Complaint.

11 16.3 Defendants deny the allegations contained in paragraph
12 16.3 of plaintiffs' Complaint.

13 16.4 Defendants deny the allegations contained in paragraph
14 16.4 of plaintiffs' Complaint.

15 16.5 Defendants deny the allegations contained in paragraph
16 16.5 of plaintiffs' Complaint.

17 16.6 Defendants deny the allegations contained in paragraph
18 16.6 of plaintiffs' Complaint.

19 XVII.

20 17.1 Defendants incorporate by reference as if set forth in
21 full each and every answer as set forth in paragraphs 1 through
22 16 herein.

23 17.2 Defendants deny the allegations contained in paragraph
24 17.2 of plaintiffs' Complaint.
25

1 18.7 Defendants deny the allegations contained in paragraph
2 18.7 of plaintiffs' Complaint.

3 XIX.

4 19.1 Defendants incorporate by reference as if set forth in
5 full each and every answer as set forth in paragraphs 1 through
6 18 herein.

7 19.2 Defendants lack sufficient information upon which to
8 form a belief as to the truth or falsity of the allegations
9 contained in paragraph 19.2 of plaintiffs' Complaint and
10 therefore deny the same.

11 19.3 Defendants deny the allegations contained in paragraph
12 19.3 of plaintiffs' Complaint.

13 19.4 Defendants deny the allegations contained in paragraph
14 19.4 of plaintiffs' Complaint.

15 XX.

16 20.1 Defendants incorporate by reference as if set forth in
17 full each and every answer as set forth in paragraphs 1 through
18 19 herein.

19 20.2 Defendants deny the allegations contained in paragraph
20 20.2 of plaintiffs' Complaint.

21 20.3 Defendants deny the allegations contained in paragraph
22 20.3 of plaintiffs' Complaint.

23 20.4 Defendants deny the allegations contained in paragraph
24 20.4 of plaintiffs' Complaint.
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XXI.

21.1 Defendants incorporate by reference as if set forth in full each and every answer as set forth in paragraphs 1 through 20 herein. Defendants further deny the allegations contained in paragraph 21.1 of plaintiffs' Complaint.

21.2 Defendants incorporate by reference as if set forth in full each and every answer as set forth in paragraphs 1 through 20 herein. Defendants further deny the allegations contained in paragraph 21.2 of plaintiffs' Complaint.

21.3 Defendants incorporate by reference as if set forth in full each and every answer as set forth in paragraphs 1 through 20 herein. Defendants further deny the allegations contained in paragraph 21.3 of plaintiffs' Complaint.

XXII.

22.1 Defendants incorporate by reference as if set forth in full each and every answer as set forth in paragraphs 1 through 21 herein.

22.2 Defendants deny the allegations contained in paragraph 22.2 of plaintiffs' Complaint.

XXIII.

23.1 Defendants incorporate by reference as if set forth in full each and every answer as set forth in paragraphs 1 through 22 herein.

23.2 Defendants deny the allegations contained in paragraph 23.2 of plaintiffs' Complaint.

1 Reynolds and Dee Chabot were barred from attending church
2 services at Community Chapel and Bible Training Center.

3 26.5 Defendants deny the allegations contained in paragraph
4 26.5 of plaintiffs' Complaint.

5 XXVII.

6 27.1 Defendants incorporate by reference as if set forth in
7 full each and every answer as set forth in paragraphs 1 through
8 26 herein.

9 27.2 Defendants deny the allegations contained in paragraph
10 27.2 of plaintiffs' Complaint.

11
12 AND BY WAY OF AFFIRMATIVE DEFENSE, defendants allege as
13 follows:

14 XXVIII.

15 LACK OF SUBJECT MATTER JURISDICTION

16 With respect to plaintiffs' first, second, third, fourth,
17 sixth, seventh, eighth, ninth and tenth causes of action, the
18 Court lacks jurisdiction over the subject matter inasmuch as the
19 essence of plaintiffs' Complaint pertains to private church
20 matters protected from judicial intervention by the First
21 Amendment to the Constitution of the United States and the
22 Constitution of the State of Washington, Article 1, Section 11,
23 Amended 34.
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XXIX.

FAILURE TO STATE A CLAIM

With respect to plaintiffs' first, second, third, fourth, seventh, eighth, ninth, tenth and eleventh causes of action, the plaintiffs' Complaint fails to state a claim upon which relief may be granted.

XXX.

COMPARATIVE AND CONTRIBUTORY NEGLIGENCE

Plaintiffs' injuries and damages, if any, were proximately caused by the contributory and/or comparative negligence of the plaintiffs.

XXXI.

CONTRIBUTORY GROSS NEGLIGENCE
AND WANTON AND WILFUL MISCONDUCT

Plaintiffs' injuries and damages, if any, were proximately caused by the gross negligence and/or wanton and wilful misconduct of plaintiffs in acting with gross negligence and intentionally and/or recklessly acting in disregard of the consequences.

XXXII.

ASSUMPTION OF RISK

Plaintiffs' injuries and damages, if any, are not actionable because plaintiffs assumed the risk of harm by their actions, including but not limited to, voluntary, knowing and express consent to the situation which caused their harm, if any.

1 XXXIII.

2 LICENSE

3 Insofar as plaintiffs have alleged sexual assault and battery
4 in their fifth cause of action, which acts defendants deny,
5 defendants further allege that any and all physical contact
6 forming the basis of plaintiffs' fifth cause of action, if any,
7 was initiated and/or consented to by the relevant plaintiffs.

8 XXXIV.

9 DEFAMATION DEFENSES

10 Defendants allege that any public statements regarding any
11 plaintiffs which defendants may have made were legally justified
12 on the basis of truth, fair comment and/or privilege.

13 XXXV.

14 INCONSEQUENTIAL DISFELLOWSHIP

15 The disfellowship, though not actionable, of plaintiffs Sandy
16 Ehrlich, Michael Ehrlich, Larry Lemke, Kathryn Reynolds and Dee
17 Chabot, was of no consequence inasmuch as each plaintiff had
18 already resigned, quit, and/or discontinued their involvement
19 with Community Chapel and Bible Training Center by the time they
20 were disfellowshipped from the church.

21 XXXVI.

22 JUSTIFICATION

23 Regarding plaintiffs' tenth cause of action, defendants had
24 just cause for their actions.
25

1 XXXVII.

2 UNCLEAN HANDS

3 Inasmuch as plaintiffs seek injunctive relief, plaintiffs
4 have come before the court with "unclean hands" and should
5 therefore be denied equity.
6

7 COUNTERCLAIM FOR FRIVOLOUS LAWSUIT

8 AND BY WAY OF COUNTERCLAIM against plaintiffs and each of
9 them, individually and, in the case of plaintiffs Sandy Ehrlich
10 and Michael Erhlich, as a marital community, the defendants and
11 each of them allege as follows:

12 XXXVIII.

13 Plaintiffs' action is frivolous and has been advanced without
14 reasonable cause, requiring the defendants to incur substantial
15 attorney's fees and costs in defending this action. Under RCW
16 4.85.185 and because this action lacks merit and has not been
17 brought in good faith, the defendants and each of them are
18 entitled to judgment for their reasonable expenses, including
19 attorney fees and costs, incurred in defending the present
20 action.

21 XXXIX.

22 Defendants may further be entitled to attorney's fees and
23 costs under RCW 4.84.250 and further plead this statute as an
24 additional theory for recovering their attorneys' fees and costs
25 incurred herein.

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WHEREFORE, having fully answered the plaintiffs' Complaint, having asserted various affirmative defenses, and having asserted a counterclaim for frivolous action, the defendants pray for the following relief.

1. That plaintiffs' Complaint be dismissed with prejudice and without costs, disbursements or attorney's fees;

2. That defendants and each of them be awarded judgment in their favor as against each and every plaintiff, individually, and the marital community of Sandy Ehrlich and Michael Ehrlich, for their reasonable expenses, including attorney's fees, costs and disbursements incurred herein, to be established upon post-trial motion, under RCW 4.84.185 and/or RCW 4.84.250;

3. That the Court grant such other and further relief as the Court may deem to be just and equitable in the premises.

DATED this _____ day of _____, 1986.

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

By Michael J. Bond
MICHAEL J. BOND
Attorney for Defendants

MOREN, LAGESCHULTE & CORNELL, P.S.

By Michael W. Bugni
MICHAEL W. BUGNI
Attorney for Defendants

In the Superior Court of the State of Washington,
In and For the County of KING

DEC 16 6 1986
KING COUNTY
SUPERIOR COURT

ORIGINAL

SANDY EHRLICH and MICHAEL EHRLICH,
et al.,

Plaintiffs,

v.

RALPH ALSKOG, et ux.,
et al.,

Defendants.

No. 86-2-18429-5

SUBPOENA DUCES TECUM

THE STATE OF WASHINGTON, TO: Records Custodian, Sexual Assault Center,
Harborview Medical Center
GREETINGS: 325 Ninth Ave.

Seattle, WA 98104

YOU ARE HEREBY COMMANDED to be and appear at the offices of

LEE, SMART, COOK, MARTIN & PATTERSON, P.S., INC., 800 Washington Building

4th & Union Street, Seattle, Washington, on Wednesday, the 24th day of

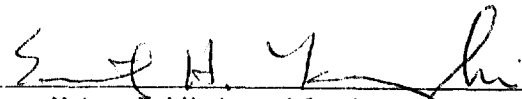
December, 1986, commencing at the hour of 1:00 o'clock P. M. on said
day, then and there to testify as a witness in behalf of the defendants

in the above-entitled cause, and to remain in attendance upon the undersigned or any other Notary
Public until discharged. AND YOU ARE FURTHER COMMANDED to bring with you at said time and
place the following instruments, papers, and documents, to-wit:

All records, files, notes, charts, admission sheets, discharge sheets, laboratory
test reports, x-rays, and any and all medical records in your possession,
including notes, pertaining to the care and treatment of SYBIL LEMKE

HEREIN FAIL NOT AT YOUR PERIL.

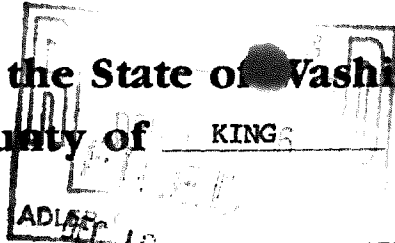
WITNESS my hand and official seal this 15th day of December, 1986


Notary Public in and for the State of Washington,
residing at Seattle.



YAMAGUCHI & ASSOCIATES
Court Reporters
408 Central Building
Seattle, WA 98104
206-622-6875

In the Superior Court of the State of Washington,
In and For the County of KING



ORIGINAL

SANDY EHRLICH and MICHAEL EHRLICH,
et al.,

Plaintiffs,

v.

RALPH ALSKOG, et ux.,
et al.,

Defendants.

No. 86-2-18429-5

SUBPOENA DUCES TECUM

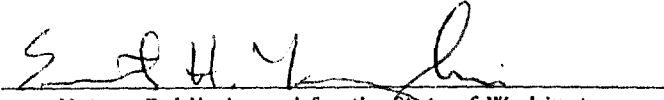
THE STATE OF WASHINGTON, TO: Records Custodian of David Penner, Ph.D.
12844 Military Road S.
GREETINGS: Seattle, WA 98168

YOU ARE HEREBY COMMANDED to be and appear at the offices of
LEE, SMART, COOK, MARTIN & PATTERSON, P.S., INC., 800 Washington Building
4th & Union Street, Seattle, Washington, on Wednesday, the 24th day of
December, 1986, commencing at the hour of 1:30 o'clock P. M. on said
day, then and there to testify as a witness in behalf of the defendants
in the above-entitled cause, and to remain in attendance upon the undersigned or any other Notary
Public until discharged. AND YOU ARE FURTHER COMMANDED to bring with you at said time and
place the following instruments, papers, and documents, to-wit:

All records, files, notes, charts, admission sheets, discharge sheets,
laboratory test reports, x-rays, and any and all medical records in your
possession, including notes, pertaining to the care and treatment of SYBIL
LEMKE.

HEREIN FAIL NOT AT YOUR PERIL.

WITNESS my hand and official seal this 15th day of December, 19 86.


Notary Public in and for the State of Washington,
residing at Seattle.

YAMAGUCHI & ASSOCIATES
Court Reporters
408 Central Building
Seattle, WA 98104
206-622-6875

In the Superior Court of the State of Washington,
In and For the County of KING

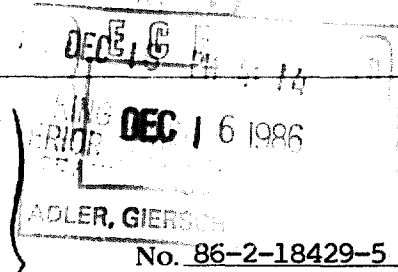
SANDY EHRLICH and MICHAEL EHRLICH,
et al.,

Plaintiffs,

v.

RALPH ALSKOG, et ux.,
et al.,

Defendants.



SUBPOENA DUCES TECUM

THE STATE OF WASHINGTON, TO: Records Custodian of Arthur Wassmer, Ph.D.

GREETINGS:

10827 N.E. 68th
Suite E

Kirkland, WA 98033

YOU ARE HEREBY COMMANDED to be and appear at the offices of

LEE, SMART, COOK, MARTIN & PATTERSON, P.S., INC., 800 Washington Building

4th & Union Street, Seattle, Washington, on Wednesday, the 24th day of

December, 1986, commencing at the hour of 2:00 o'clock P M. on said

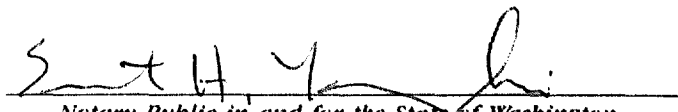
day, then and there to testify as a witness in behalf of the defendants

in the above-entitled cause, and to remain in attendance upon the undersigned or any other Notary Public until discharged. AND YOU ARE FURTHER COMMANDED to bring with you at said time and place the following instruments, papers, and documents, to-wit:

All records, files, notes, charts, admission sheets, discharge sheets, laboratory test reports, x-rays, and any and all medical records in your possession, including notes, pertaining to the care and treatment of SYBIL LEMKE.

HEREIN FAIL NOT AT YOUR PERIL.

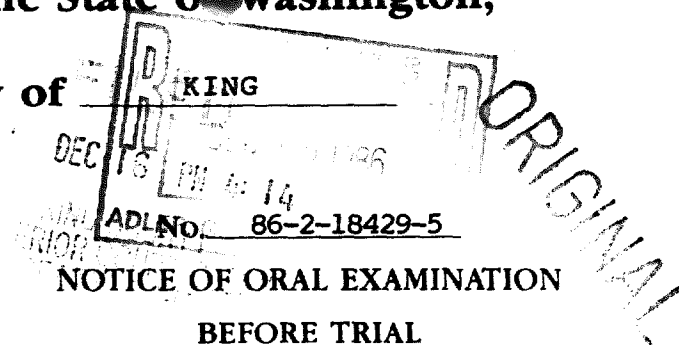
WITNESS my hand and official seal this 15th day of December, 1986


Notary Public in and for the State of Washington,
residing at Seattle.

YAMAGUCHI & ASSOCIATES
Court Reporters
408 Central Building
Seattle, WA 98104
206-622-6875

In the Superior Court of the State of Washington,

In and For the County of King



SANDY EHRLICH and MICHAEL EHRLICH,
et al.,

v. Plaintiff

RALPH ALSKOG, et ux.,
et al.,

Defendant

NOTICE OF ORAL EXAMINATION
BEFORE TRIAL

To: All Parties of Record

and to: Their Respective Counsel

YOU, AND EACH OF YOU, WILL PLEASE TAKE NOTICE that the testimony of
Records Custodian of David Penner, Ph.D. ~~XX~~ ^{above named} will be
taken on Oral Examination Before Trial at the instance and request of the defendants in the
above entitled and numbered action, before Ernest H. Yamaguchi, Notary Public, or some other
Notary Public at 800 Washington Building, 4th & Union Street,
Seattle, Washington, on Wednesday, the 24th day of December
19 86, commencing at the hour of 1:30 o'clock, P. M., on that day; the said Oral Examination
of said witness at said time and place to be subject to continuance or adjournment from time to time
or place to place until completed.

This testimony upon oral examination will be taken on the ground and for the reason the said person
is a party to or a witness in the above entitled action, and will give evidence material to the establishment
of the defendants' case.

DATED this 15th day of December, 19 86.

Michael J. Bond
MICHAEL J. BOND

Attorneys for Defendants

Office and Post Office Address:

800 Washington Building
Seattle, Washington.

624-7990

YAMAGUCHI & ASSOCIATES
Court Reporters
408 Central Building
Seattle, WA 98104
206-622-6875

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

SANDY EHRLICH and MICHAEL
EHRLICH, wife and husband;
LARRY LEMKE, parent; LARRY
LEMKE, Guardian ad Litem on
behalf of SYBIL N. LEMKE, a
minor; KATHRYN REYNOLDS; DEE
CHABOT, parent; DEE CHABOT,
Guardian ad Litem on behalf
of SHAWNA MICHELLE CHABOT,
MICHAEL GRANT CHABOT, NICHOLAS
STERLING CHABOT, minors,

Plaintiffs,

v.

RALPH ALSKOG and ROSEMARY
ALSKOG, husband and wife;
ROBERT HOWERTON and JANE DOE
HOWERTON, husband and wife;
E. SCOTT HARTLEY and JANE DOE
HARTLEY; DONALD LEE BARNETT
and BARBARA BARNETT, husband
and wife; COMMUNITY CHAPEL
AND BIBLE TRAINING CENTER,
a Washington corporation;
"JOHN DOES" 1-4 and "JANE
DOES" 1-4, husbands and wives;
FIRST DOE CORPORATION; and
FIRST DOE PARTNERSHIP,

Defendants.

NO. 86-2-18429-5

INTERROGATORIES AND REQUEST
FOR PRODUCTION DIRECTED TO
PLAINTIFF LARRY LEMKE AS
GUARDIAN AD LITEM FOR SYBIL
N. LEMKE
AND ANSWERS THERETO

TO: LARRY LEMKE, as guardian ad litem for Sybil N. Lemke,
Plaintiff; and

TO: RICHARD H. ADLER, his attorney

INTERROGS & REQ FOR PRODUCTION TO
PLTF LARRY LEMKE - 1

LEE, SMART, COOK, MARTIN & PATTERSON, P.S., INC.
ATTORNEYS AT LAW
800 WASHINGTON BUILDING
1325 FOURTH AVENUE
SEATTLE, WASHINGTON 98101
(206) 624-7990

1 Pursuant to Rule 33 and 34, Civil Rules for Superior Court,
2 you are requested to supply answers to interrogatories and request
3 for production on the following pages. As required by CR 33 and 34,
4 please enter full and complete answers to each and every part in the
5 blank space provided, inserting additional pages where necessary;
6 verify your answers on the form provided after the last interroga-
7 tory; and serve a complete set of the interrogatories, answers and
8 attachments on the undersigned and file the original with the Clerk
9 of the Court within twenty (20) days of receipt hereof.

10 These interrogatories are continuing and require supple-
11 mental answers upon discovery of additional pertinent information
12 [CR 26(e)]. "She" or "her" means Sybil Lemke.

13 DATED this 22 day of October, 1986.

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

16 By Michael J. Bond
17 Michael J. Bond
Of attorneys for defendants

- 18 1. (a) State her full name and address.
19 (b) Has she ever gone under any other name or
20 different spelling of said name? If so, what
21 name or different spelling?
22 (c) State the date and place of her birth.
(d) State her Social Security number.

23 ANSWER:

- 24 a) Sybil Noel Lemke b) No c) October 18, 1971, Seattle, WA
25 d) 539-98-5027

INTERROGS & REQ FOR PRODUCTION TO
PLTF LARRY LEMKE - 2

LEE, SMART, COOK, MARTIN & PATTERSON, P.S., INC.
ATTORNEYS AT LAW
800 WASHINGTON BUILDING
1325 FOURTH AVENUE
SEATTLE, WASHINGTON 98101
(206) 624-7880

1 2. If she has lived in any other part of the United States,
2 name all such other places and dates.

3 ANSWER: No.

4
5
6 3. List the addresses, with the dates, where she resided
during the past ten years.

7 ANSWER: In addition to her present address she has resided at 424 South 188th,
8 Seattle, WA 98148 from 1976 to 1986.

9
10
11 4. State the month and year she last attended any school,
12 the highest grade or year completed, and the name and
location of each such school.

13 ANSWER: As of November 1986 she is in 9th Grade at Mt. Si High School in
14 Snoqualmie, WA.

15
16
17 5. If she ^{is} ~~are~~ married, please state her spouse's name and
18 the date and place of her marriage. If she has been
19 married more than once, state the names and addresses of
20 previous spouses, if living, and the date and place of
their death or her divorce.

21 ANSWER: She has never been married.

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24 6. State the names, addresses, and ages of her children, if
25 any.

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ANSWER:

No children.

7. List all injuries caused by any accident during her lifetime, stating the place, date and nature.

ANSWER: She had a broken ankle in approximately 1980 in Seattle.

8. Has she ever been hospitalized. If so, list the approximate dates, the reasons for the hospitalization, and the name and address of the hospital.

ANSWER: N/A

1 9. List any and all sicknesses or diseases suffered during
2 her lifetime, the approximate dates thereof and periods
3 of disability (omit minor childhood diseases and illnesses).

4 ANSWER: N/A

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10 10. List the names and addresses of all doctors, psychia-
11 trists, psychologists, osteopaths, chiropractors or
12 healers who have treated her the last ten years pre-
13 ceding the accident, the reason for the treatment, the
nature of the treatment, and the approximate dates
thereof.

14 ANSWER: None.

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22 11. Set forth exactly what injuries she claims she
received as a result of this incident.

23 ANSWER: Severe emotional distress

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12. List the names and addresses of all doctors and/or physical therapists who have treated her from the time of the occurrence alleged in your Complaint, to date.

ANSWER: None

13. List the dates of treatment and/or examination by the doctors and/or physical therapists referred to by her in response to Interrogatory No. 12.

ANSWER: N/A

14. State the nature of the treatment by those doctors and/or physical therapists listed by her in response to Interrogatory No. 12.

ANSWER: N/A

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15. Was she hospitalized as a result of her claimed injuries? If so, state the dates of hospitalization and where hospitalized.

ANSWER: No.

16. Give an itemization of all hospital and medical expense incurred by her which you attribute to the incident alleged in her Complaint.

ANSWER: \$65 charge for one counseling session at Harborview Medical Center, Sexual Assault Center.

17. List any other out-of-pocket expenses not heretofore mentioned that she may claim as a result of this incident.

ANSWER: Future professional counseling costs to be incurred.

1 18. If she has engaged any person or persons to do any work,
2 at home or otherwise, that she is alleging would not
3 have been necessary if it were not for the occurrence
4 and injuries alleged in her Complaint, state the name
5 and address of each such person or persons, the period
6 of each such employment, the general nature of the
7 duties of each such person in each such employment, and
8 the compensation paid to each such person by the
9 plaintiff for such service.

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11
12 ANSWER: N/A

13 19. List any sickness, injury or disease suffered since the
14 time of the accident, giving names and addresses of any
15 and all physicians who have treated her therefor, and
16 the dates of hospitalization, if any.

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19 ANSWER: N/A

20 20. If she has been injured since the time of the incident,
21 set forth the specific details thereof as to how, when,
22 where, and the names and addresses of any other parties
23 known to her who were involved in this accident.

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25 ANSWER: N/A

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21. If, since the date of the incident alleged in her Complaint, she has had occasion to make use of any medication, state, if known, the nature of each such medication, the doctor prescribing same, the period during which each such medication was taken, and the approximate amount of money expended to date for the purchase of each such medication so listed.

ANSWER:

No.

22. State the names and addresses of all of her employers and the nature of her employment over the past ten years, indicating the approximate dates involved.

ANSWER: N/A

1 23. If, during any of the periods of employment mentioned
2 above, she lost time from work due to illness or acci-
dent, list the date, time lost, and the reason therefor.

3 ANSWER:

4 N/A

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9 24. Was she working at the time of this incident? If so,
10 state the name, address, and telephone of her employer,
11 her job title, the nature of her employment, and
approximately how many hours she worked per week.

12 ANSWER:

13 N/A

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18 25. What was her rate of pay during the time which is a
19 subject of this lawsuit?

20 ANSWER:

21 N/A

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24 26. How much time did she lose from work as a result of the
25 events alleged in her complaint.

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ANSWER:

N/A

27. What is her total loss of wages, or income, if any, to date, as a result of this incident?

ANSWER:

N/A

28. If she has been self-employed, state for each period of self-employment the net monthly earnings.

ANSWER:

N/A

29. Has she ever previously made a claim for an injury or been involved in a lawsuit? If so, state the nature of the action, the court or tribunal in which it was filed, the cause number, disposition of the case, and the name, address and telephone number of the attorney who represented her.

ANSWER:

No.

30. Has she ever made a claim for injuries which did not result in a lawsuit? If so, identify each by stating when, where, the nature of the action, the disposition of the case, and the name, address and telephone number of the attorney who represented her.

1 ANSWER:

2 No.

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7 31. Has she ever been convicted of a crime? If so, please
8 state for each such crime the statutory provision vio-
9 lated, the court in which the case was heard, the type
 of disposition of the case, the cause number, and the
 name, address and telephone of the attorney who repre-
 sented her.

10 ANSWER: No.

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17 32. Furnish the names, addresses, occupations, job designa-
18 tions and present location of any person known to her or
19 her attorneys, as having knowledge of relevant facts
 pertaining to the above-entitled cause. This request is
 intended to include all witnesses known to her or her
 attorneys.

20 ANSWER: Objection. The Court of Appeals has determined that this form of
21 question is beyond the proper scope of discovery.

1 33. Has she given any written or oral statements to anyone
2 concerning the accident? If so, state the name and
3 address of the person or persons who took each such
statement or statements.

4 ANSWER: Yes. Lawrence Daly, Detective, Dept. of Public Safety, King County
5 Courthouse, 516 Third Ave., Seattle, WA 98104
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7

8 34. Does she have any photographs of any activity involving
9 the Community Chapel and Bible Training Center?

10 ANSWER: Yes. School pictures.
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17 35. Describe her present physical condition with regard to
18 any residual pain or disability which she believes is
related to the injuries she received.

19 ANSWER: Severe emotional distress.
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24 36. State what her doctors have advised her regarding the
25 necessity of further medical treatment for the injuries
she received.

1 ANSWER: Lucy Berliner strongly advises Sybil to seek further professional
2 psychological/sexual abuse counseling.

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6 37. State what her doctors have advised her regarding the
7 possibility of permanent residual injury.

8 ANSWER:

9 There will be permanent residual injury.

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14 38. If she has applied for Unemployment Compensation since
15 the incident described in her Complaint, state the date
16 of such application.

17 ANSWER: N/A

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21
22 39. Had she had anything of an alcoholic nature to drink
23 within 5 years before the events alleged in her
24 complaint? If so, state what she had to drink, the
25 amount thereof, when and where she consumed such
 alcoholic beverage.

1 ANSWER: N/A
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6 40. Identify each person whom she expects to call as an
7 expert witness at trial, and as to each such person,
 please state the following:

8 (a) Name;

9 (b) Address;

10 (c) Telephone number;

11 (d) Occupation;

12 (e) Job classification;

13 (f) Name of employer;

14 (g) Brief resume of professional and/or educa-
15 tional history and qualifications.

16 ANSWER: To be provided at a later date.
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23 41. Please state the subject matter on which each expert she
24 has listed in answer to the preceding interrogatory is
25 expected to testify.

1 ANSWER: See Answer to Interrogatory No. 40
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6 42. State the substance of the facts and opinions to which
7 each expert in answer to Interrogatory No. 42 is
 expected to testify.

8 ANSWER: See Answer to Interrogatory No. 40.
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14 43. Please state a summary of the grounds for such opinion
15 to which the experts identified in answer to Interroga-
 tory No. 42 are expected to testify.

16 ANSWER:
17 See Answer to Interrogatory No. 40.
18
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22 44. With respect to her allegation in paragraph 13.12 of the
23 complaint that "defendants have made disparaging and
24 false statements in public regarding plaintiffs to
25 members of the congregation", please state in detail the
 contents of each such statement, the identity of the
 speaker, all members of the public who heard the alleged
 statement, the date each statement was made, and the
 location where each such statement was made.

1 ANSWER: Between May and July of 1986, Sybil Lemke's name was published in the
2 Community Chapel Bible and Training Center church bulletin which is an official
3 publication of the church. She was listed in the church bulletin as being considered
4 "special status." This term means that Sybil is a potentially bad influence on
5 other children and the church's way of warning all parents in the congregation that
6 Sybil is sinful, possessed by demonic spirits, or having rebellion problems. Parents
7 of other children in the congregation are supposed to respond by preventing their
8 children from having any social or other contact with Sybil.

9
10 45. Please identify the name, address and dates of atten-
11 dance of every church she attended any type of service,
12 whether it be worship service, counseling, education or
13 social meeting since January 1, 1975.

14 ANSWER:

15 Sybil attended three services weekly from January 1, 1975 to
16 November 1985 on Friday evening, Sunday morning, and Sunday evening.

17
18 46. With respect to her allegation in paragraph 14.2 of the
19 complaint, please state the date of each sexual assault,
20 the location of each sexual assault, the persons present
21 at the time each sexual assault occurred and all persons
22 with knowledge of these alleged sexual assaults.

23 ANSWER: Please obtain this information directly from your client as he has
24 been charged with a criminal offense. The information in the criminal reports which
25 are already in defendant's possession will answer your questions regarding each sexual
26 assault, the location of each sexual assault, the persons present at the time each
27 sexual assault occurred and all persons involved in each sexual assault.

INTERROGS & REQ FOR PRODUCTION TO
PLTF LARRY LEMKE - 17

LEE, SMART, COOK, MARTIN & PATTERSON, P.S., INC.
ATTORNEYS AT LAW
800 WASHINGTON BUILDING
1325 FOURTH AVENUE
SEATTLE, WASHINGTON 98101
(206) 624-7990

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REQUEST FOR PRODUCTION NO. 1: Produce true and correct copies of all of her income tax returns for the past ten years.

RESPONSE: N/A

ANSWERS and RESPONSES to the foregoing INTERROGATORIES and REQUEST FOR PRODUCTION submitted this 19th day of November, 1986.



RICHARD H. ADLER
Of Attorneys for Plaintiffs

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

3 The undersigned (parties to the above-entitled action, or
4 persons authorized to respond on behalf of said parties), being
5 first duly sworn, on oath, depose and say:

6 That they have read the foregoing Interrogatories, Request
7 for Production and the Answers thereto, know the contents thereof,
8 and believe the same to be true.

9
10 Sybil N. Lemke

11
12 _____

13
14 SUBSCRIBED AND SWORN to before me this 19th day of
15 November, 1986.

16
17 Anna A. Engle
18 Notary Public in and for the State of
Washington, residing at Seattle

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FILED

DEC 16 1982

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

SANDY EHRLICH and MICHAEL
EHRLICH, wife and husband;
LARRY LEMKE, parent; LARRY
LEMKE, Guardian ad Litem on
behalf of SYBIL N. LEMKE, a
minor; KATHRYN REYNOLDS; DEE
CHABOT, parent; DEE CHABOT,
Guardian ad Litem on behalf
of SHAWNA MICHELLE CHABOT,
MICHAEL GRANT CHABOT, NICHOLAS
STERLING CHABOT, minors,

Plaintiffs,

v.

RALPH ALSKOG and ROSEMARY
ALSKOG, husband and wife;
ROBERT HOWERTON and JANE DOE
HOWERTON, husband and wife;
E. SCOTT HARTLEY and JANE DOE
HARTLEY; DONALD LEE BARNETT
and BARBARA BARNETT, husband
and wife; COMMUNITY CHAPEL
AND BIBLE TRAINING CENTER,
a Washington corporation;
"JOHN DOES" 1-4 and "JANE
DOES" 1-4, husbands and wives;
FIRST DOE CORPORATION; and
FIRST DOE PARTNERSHIP,

Defendants.

NO. 86-2-18429-5

INTERROGATORIES AND REQUEST
FOR PRODUCTION DIRECTED TO
PLAINTIFF LARRY LEMKE
AND ANSWERS THERETO

TO: LARRY LEMKE, Plaintiff; and

TO: RICHARD H. ADLER, his attorney:

INTERROGS & REQ FOR PRODUCTION TO
PLTF LARRY LEMKE - 1

LEE, SMART, COOK, MARTIN & PATTERSON, P.S., INC.
ATTORNEYS AT LAW
800 WASHINGTON BUILDING
1325 FOURTH AVENUE
SEATTLE, WASHINGTON 98101
(206) 624-7990

1 Pursuant to Rule 33 and 34, Civil Rules for Superior Court,
2 you are requested to supply answers to interrogatories and request
3 for production on the following pages. As required by CR 33 and 34,
4 please enter full and complete answers to each and every part in the
5 blank space provided, inserting additional pages where necessary;
6 verify your answers on the form provided after the last interroga-
7 tory; and serve a complete set of the interrogatories, answers and
8 attachments on the undersigned and file the original with the Clerk
9 of the Court within twenty (20) days of receipt hereof.

10 These interrogatories are continuing and require supple-
11 mental answers upon discovery of additional pertinent information
12 [CR 26(e)].

13 DATED this 22 day of October, 1986.

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

16 By Michael J. Bond
17 Michael J. Bond
Of attorneys for defendants

- 18 1. (a) State your full name and address.
19 (b) Have you ever gone under any other name or
20 different spelling of said name? If so, what
21 name or different spelling?
22 (c) State the date and place of your birth.
(d) State your Social Security number.

23 ANSWER: a) Larry Lemke b) No. c) Seattle, WA, May 12, 1952
24 P.O. Box 98243
Des Moines, WA 98198 d) SSN: D538-56-1071
25

INTERROGS & REQ FOR PRODUCTION TO
PLTF LARRY LEMKE - 2

LEE, SMART, COOK, MARTIN & PATTERSON, P.S., INC.
ATTORNEYS AT LAW
800 WASHINGTON BUILDING
1325 FOURTH AVENUE
SEATTLE, WASHINGTON 98101
(206) 624-7990

1 2. If you have lived in any other part of the United
2 States, name all such other places and dates.

3 ANSWER: No.

4
5
6 3. List the addresses, with the dates, where you have
resided during the past ten years.

7 ANSWER: With the exception of my present address I have lived at
8 424 S. 188th St., Seattle, WA 98148, from 1976 through 1986
9

10
11 4. State the month and year you last attended any school,
12 the highest grade or year completed, and the name and
location of each such school.

13 ANSWER: Community Chapel and Bible College, Sept. 1983 - Sept. 1985
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18 5. If you are married, please state your spouse's name and
19 the date and place of your marriage. If you have been
20 married more than once, state the names and addresses of
previous spouses, if living, and the date and place of
their death or your divorce.

21 ANSWER: Married May 1971 and divorced April 1986. My former spouse's name
is Shannon Lemke .
22
23

24 6. State the names, addresses, and ages of your children,
25 if any.

1 ANSWER: My children are Sybil Lemke, who lives in Redmond, WA and is 15 years
2 old. ~~My~~ other daughter is Sarah Lemke, who lives in Normandy Park. She is 11 years
3 old.
4
5

6 7. List all injuries caused by any accident during your
7 lifetime, stating the place, date and nature.

8 ANSWER: None.
9

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14 8. Have you ever been hospitalized. If so, list the
15 approximate dates, the reasons for the hospitalization,
16 and the name and address of the hospital.

17 ANSWER:
18 No.
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1 9. List any and all sicknesses or diseases suffered during
2 your lifetime, the approximate dates thereof and periods
3 of disability (omit minor childhood diseases and illnesses).

4 ANSWER: N/A

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11 10. List the names and addresses of all doctors, psychia-
12 trists, psychologists, osteopaths, chiropractors or
13 healers who have treated you in the last ten years pre-
ceding the accident, the reason for the treatment, the
nature of the treatment, and the approximate dates
thereof.

14 ANSWER: None.

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22 11. Set forth exactly what injuries you claim you
23 received as a result of this incident.

24 ANSWER: Severe emotional distress.

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12. List the names and addresses of all doctors and/or physical therapists who have treated you from the time of the occurrence alleged in your Complaint, to date.

ANSWER: David Penner, Ph.D., 12844 Military Road S., Seattle, WA 98168 and Arthur Wassmer, Ph.D., 10827 NE 68th, Suite E., Kirkland, WA.

13. List the dates of treatment and/or examination by the doctors and/or physical therapists referred to by you in response to Interrogatory No. 12.

ANSWER: May 1986, June 1986, September 1986, October 1986.

14. State the nature of the treatment by those doctors and/or physical therapists listed by you in response to Interrogatory No. 12.

ANSWER: Psychological counseling

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15. Were you hospitalized as a result of your claimed injuries? If so, state the dates of hospitalization and where hospitalized.

ANSWER: No.

16. Give an itemization of all hospital and medical expense incurred by you which you attribute to the incident alleged in your Complaint.

ANSWER: My sessions with Dr. Penner cost \$75 each; my sessions with Dr. Wassmer cost \$90 each hour. I have lacked the financial resources to continue the counseling which I desperately need.

17. List any other out-of-pocket expenses not heretofore mentioned that you may claim as a result of this incident.

ANSWER: Loss of income

1 18. If you have engaged any person or persons to do any
2 work, at home or otherwise, that you are alleging would
3 not have been necessary if it were not for the occur-
4 rence and injuries alleged in your Complaint, state the
5 name and address of each such person or persons, the
6 period of each such employment, the general nature of
7 the duties of each such person in each such employment,
8 and the compensation paid to each such person by the
9 plaintiff for such service.

10 ANSWER:

11 No.

12 19. List any sickness, injury or disease suffered since the
13 time of the accident, giving names and addresses of any
14 and all physicians who have treated you therefor, and
15 the dates of hospitalization, if any.

16 ANSWER:

17 N/A

18
19
20 20. If you have been injured since the time of the incident,
21 set forth the specific details thereof as to how, when,
22 where, and the names and addresses of any other parties
23 know to you who were involved in this accident.

24 ANSWER:

25 N/A

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21. If, since the date of the incident alleged in your Complaint, you have had occasion to make use of any medication, state, if known, the nature of each such medication, the doctor prescribing same, the period during which each such medication was taken, and the approximate amount of money expended to date for the purchase of each such medication so listed.

ANSWER:
N/A

22. State the names and addresses of all of your employers and the nature of your employment over the past ten years, indicating the approximate dates involved.

ANSWER: I have been employed by Early American Life Insurance. Their home office is located at 2706 Gannon Road, St. Paul, Minnesota, 55116. I have been employed as an insurance agent from approximately September 1983 to the present time. Previously I was employed as an insurance agent from September 1981 to September 1983 for Insurance and Financial Design Center in Bellevue, Washington. Prior to that time I was a truck driver employed from approximately April 1976 through June 1981 for Garrett Freight Lines located at 4501 Sixth Avenue S., Seattle, WA

1 23. If, during any of the periods of employment mentioned
2 above, you lost time from work due to illness or acci-
dent, list the date, time lost, and the reason therefor.

3 ANSWER: Since December 1985 I have been unable to work normally or regularly
4 as an insurance agent because I have been suffering from severe emotional distress.
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9 24. Were you working at the time of this incident? If so,
10 state the name, address, and telephone of your employer,
11 your job title, the nature of your employment, and
approximately how many hours you worked per week.

12 ANSWER: Yes. I was employed by Early American Life Insurance Co. I served
13 as a general agent in insurance sales work. I worked between 50 and 60 hours each
14 week.
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19 25. What was your rate of pay during the time which is a
subject of this lawsuit?

20 ANSWER: I was paid on a commission rate of 85% of the first year premium
21 insurance policies sold. For example, in November 1985, the last month I worked, I
22 had placed \$6000 worth of business.
23

24 26. How much time did you lose from work as a result of the
25 events alleged in your complaint.

1 ANSWER: Since December of 1985 I have been unable to work regularly due
2 to severe emotional distress.

3
4 27. What is your total loss of wages, or income, if any, to
5 date, as a result of this incident?

6 ANSWER: I have lost approximately \$4000 per month since December 1985. At
7 the time of answering these interrogatories, I approximate my loss at 11 months x
8 \$4000 = \$44,000.

9 28. If you have ever been self-employed, state for each
10 period of self-employment the net monthly earnings.

11 ANSWER: \$4000 per month.

12
13 29. Have you ever previously made a claim for an injury or
14 been involved in a lawsuit? If so, state the nature of
15 the action, the court or tribunal in which it was filed,
16 the cause number, disposition of the case, and the name,
17 address and telephone number of the attorney who repre-
18 sented you.

19 ANSWER:

20 No.

21
22 30. Have you ever made a claim for injuries which did not
23 result in a lawsuit? If so, identify each by stating
24 when, where, the nature of the action, the disposition
25 of the case, and the name, address and telephone number
of the attorney who represented you.

INTERROGS & REQ FOR PRODUCTION TO
PLTF LARRY LEMKE - 11

LEE, SMART, COOK, MARTIN & PATTERSON, P.S., INC.
ATTORNEYS AT LAW
600 WASHINGTON BUILDING
1325 FOURTH AVENUE
SEATTLE, WASHINGTON 98101
(206) 624-7990

1 ANSWER: No.
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7 31. Have you ever been convicted of a crime? If so, please
8 state for each such crime the statutory provision vio-
9 lated, the court in which the case was heard, the type
 of disposition of the case, the cause number, and the
 name, address and telephone of the attorney who repre-
 sented you.

10 ANSWER: No.
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17 32. Furnish the names, addresses, occupations, job designa-
18 tions and present location of any person known to you or
19 your attorneys, as having knowledge of relevant facts
 pertaining to the above-entitled cause. This request is
 intended to include all witnesses known to you or your
 attorneys.

20 ANSWER: Objection: this question is beyond the scope of proper discovery per
21 the Court of Appeals ruling.
22

1 33. Have you given any written or oral statements to anyone
2 concerning the incident? If so, state the name and
3 address of the person or persons who took each such
statement or statements.

4 ANSWER: Objection: vague and overbroad -- to the terms "concerning the
5 incident."
6
7

8 34. Do you have any photographs of any activity involving
the Community Chapel and Bible Training Center?

9 ANSWER: No.
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17 35. Describe your present physical condition with regard to
18 any residual pain or disability which you believe is
related to the injuries you received.

19 ANSWER: Severe emotional distress.
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22

23 36. State what your doctors have advised you regarding the
24 necessity of further medical treatment for the injuries
25 you received.

1 ANSWER: Dr. Penner and Dr. Wassmer have advised me of the need for further
2 psychological counseling.

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6 37. State what your doctors have advised you regarding the
7 possibility of permanent residual injury.

8 ANSWER:

9 There will be permanent residual injury.

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14 38. If you have applied for Unemployment Compensation since
15 the incident described in your Complaint, state the date
of such application.

16 ANSWER:

17 N/A

18
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21
22 39. Had you had anything of an alcoholic nature to drink
23 within 5 years before the events alleged in your
24 complaint? If so, state what you had to drink, the
25 amount thereof, when and where you consumed such
alcoholic beverage.

1 ANSWER: Objection: form of the question and relevancy. I do not see the
2 relevance of this question nor can I see how this question could lead to discoverable
3 or relevant information. Without waiving this objection, the answer is no.
4
5

6 40. Identify each person whom you expect to call as an
7 expert witness at trial, and as to each such person,
8 please state the following:

9 (a) Name;

10 (b) Address;

11 (c) Telephone number;

12 (d) Occupation;

13 (e) Job classification;

14 (f) Name of employer;

15 (g) Brief resume of professional and/or educa-
16 tional history and qualifications.

17 ANSWER: To be provided at a later date.
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23 41. Please state the subject matter on which each expert you
24 have listed in answer to the preceding interrogatory is
25 expected to testify.

1 ANSWER: See Answer to Interrogatory No. 40.
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6 42. State the substance of the facts and opinions to which
7 each expert in answer to Interrogatory No. 42 is
8 expected to testify.

9 ANSWER: See Answer to Interrogatory No. 40.
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14 43. Please state a summary of the grounds for such opinion
15 to which the experts identified in answer to Interroga-
16 tory No. 42 are expected to testify.

17 ANSWER: See Answer to Interrogatory No. 40.
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21 44. With respect to your allegation in paragraph 13.12 of
22 the complaint that "defendants have made disparaging and
23 false statements in public regarding plaintiffs to
24 members of the congregation", please state in detail the
25 contents of each such statement, the identity of the
 speaker, all members of the public who heard the alleged
 statement, the date each statement was made, and the
 location where each such statement was made.

1 ANSWER: Sometime between November of 1985 and December of 1985, my name was
2 printed in the Community Chapel Bible and Training Center church bulletin as having
3 been "disfellowshipped" from the church. This bulletin is distributed to all
4 members of the church. This bulletin is an official publication of the church.
5 Being "disfellowshipped" means that I refuse to forsake sin, was possessed by
6 demonic spirits, and/or was in rebellion to church authority.

7
8 45. Please identify the name, address and dates of atten-
9 dance of every church you have attended any type of
10 service, whether it be worship service, counseling,
11 education or social meeting since January 1, 1975.

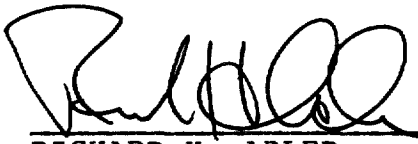
12 ANSWER: I attended three services weekly from January 1, 1975 to November 1985:
13 Friday evenings, Sunday morning, and Sunday evening. I attended these services at
14 Community Chapel and Bible Training Center at 19010 First Avenue South, Seattle, WA
15 98148. I was also enrolled in the Community Chapel and Bible Training Center's
16 Bible College from 1983 to 1985.

17
18 REQUEST FOR PRODUCTION NO. 1: Produce true and correct
19 copies of all of your income tax returns for the past ten
20 years.

21 RESPONSE: I only have my statements for 1984 and 1985 which are attached. I
22 do not have previous statements.

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ANSWERS and RESPONSES to the foregoing INTERROGATORIES and
REQUEST FOR PRODUCTION submitted this 19th day of November,
1986.



RICHARD H. ADLER
Of Attorneys for Plaintiffs

1 STATE OF WASHINGTON)
2 COUNTY OF King) ss.

3 The undersigned (parties to the above-entitled action, or
4 persons authorized to respond on behalf of said parties), being
5 first duly sworn, on oath, depose and say:

6 That they have read the foregoing Interrogatories, Request
7 for Production and the Answers thereto, know the contents thereof,
8 and believe the same to be true.

9 *Larry Lemke*
10 _____
11 _____
12 _____

13
14 SUBSCRIBED AND SWORN to before me this 19th day of
15 November, 1986.

16 *Anna A Engle*
17 _____
18 Notary Public in and for the State of
19 Washington, residing at Seattle
20 _____
21 _____
22 _____
23 _____
24 _____
25 _____

In the Superior Court of the State of Washington,
In and For the County of KING

FILED
1986 DEC 30 PM 1:21
KING COUNTY
SUPERIOR COURT
SEATTLE

RECEIVED

DEC 29 1986

SANDY EHRLICH and MICHAEL EHRLICH
et al.,

Plaintiffs,

v.

RALPH ALSKOG, et ux.,
et al.,

Defendants.

MOREN,
LAGESCHULTE & CORNELL, P.S.

No. 86-2-18429-5

SUBPOENA DUCES TECUM

THE STATE OF WASHINGTON, TO: Records Custodian of Arthur Wassmer, Ph.D.

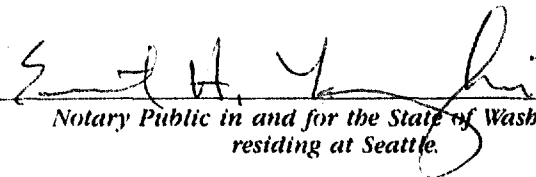
GREETINGS: 10827 N.E. 68th, Suite E
Kirkland, WA 98033

YOU ARE HEREBY COMMANDED to be and appear at the offices of
LEE, SMART, COOK, MARTIN & PATTERSON, P.S., INC., 800 Washington Building,
4th & Union Street, Seattle, Washington, on Tuesday, the 6th day of
January, 19 87, commencing at the hour of 4:00 o'clock P. M. on said
day, then and there to testify as a witness in behalf of the defendants
in the above-entitled cause, and to remain in attendance upon the undersigned or any other Notary
Public until discharged. AND YOU ARE FURTHER COMMANDED to bring with you at said time and
place the following instruments, papers, and documents, to-wit:

All records, files, notes, charts, admission sheets, discharge
sheets, laboratory test reports, x-rays, and any and all medical
records in your possession, including notes, pertaining to the
care and treatment of LARRY LEMKE.

HEREIN FAIL NOT AT YOUR PERIL.

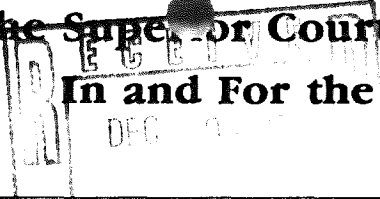
WITNESS my hand and official seal this 23rd day of December, 19 86


Notary Public in and for the State of Washington,
residing at Seattle.

YAMAGUCHI & ASSOCIATES
Court Reporters
408 Central Building
Seattle, WA 98104
206-622-6875

Handwritten initials

In the Superior Court of the State of Washington,
In and For the County of KING



FILED RECEIVED
DEC 30 PM 1:22 DEC 29 1986

SANDY EHRLICH and MICHAEL EHRLICH,
et al.,

Plaintiffs,

v.

RALPH ALSKOG, et ux.,
et al.,

Defendants.

KING COUNTY MOREN,
SUPERIOR COURT LAGESCHULTE & CORNELL, P.S.,
SEATTLE, WA

No. 86-2-18429-5

SUBPOENA DUCES TECUM

THE STATE OF WASHINGTON, TO: Records Custodian of David Penner, Ph.D.

GREETINGS:

12844 Military Road S.
Seattle, WA 98168

YOU ARE HEREBY COMMANDED to be and appear at the offices of
LEE, SMART, COOK, MARTIN & PATTERSON, P.S., INC., 800 Washington Building,

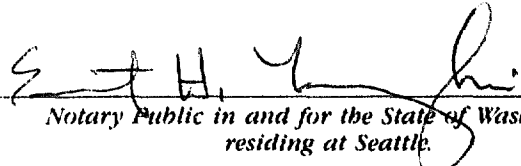
Fourth & Union Street _____, Seattle, Washington, on Tuesday, the 6th day of
January, 1987, commencing at the hour of 4:30 o'clock P. M. on said

day, then and there to testify as a witness in behalf of the defendants
in the above-entitled cause, and to remain in attendance upon the undersigned or any other Notary
Public until discharged. AND YOU ARE FURTHER COMMANDED to bring with you at said time and
place the following instruments, papers, and documents, to-wit:

All records, files, notes, charts, admission sheets, discharge
sheets, laboratory test reports, x-rays, and any and all medical
records in your possession, including notes, pertaining to the
care and treatment of LARRY LEMKE.

HEREIN FAIL NOT AT YOUR PERIL.

WITNESS my hand and official seal this 23rd day of December, 1986


Notary Public in and for the State of Washington,
residing at Seattle.

YAMAGUCHI & ASSOCIATES
Court Reporters
408 Central Building
Seattle, WA 98104
206-622-6875

In the Superior Court of the State of Washington
In and For the County of KING

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DEC 29 1986

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KING COUNTY
SUPERIOR COURT CLERK
Plaintiff

MOREN,
LAGESCHULTE & CORNELL, P.S.

No. 86-2-18429-5

SANDY EHRLICH and MICHAEL EHRLICH,
et al.,

v.

RALPH ALSKOG, et ux.,
et al.,

Defendant

NOTICE OF ORAL EXAMINATION
BEFORE TRIAL

To: All Parties of Record

and to: Their Respective Counsel

YOU, AND EACH OF YOU, WILL PLEASE TAKE NOTICE that the testimony of
Records Custodian of Arthur Wassmer, Ph.D., ~~the above named~~ will be
taken on Oral Examination Before Trial at the instance and request of the defendants in the
above entitled and numbered action, before Ernest H. Yamaguchi, Notary Public, or some other
Notary Public at 800 Washington Building, 4th & Union Street
Seattle, Washington, on Tuesday, the 6th day of January,
19 87, commencing at the hour of 4:00 o'clock, P.M., on that day; the said Oral Examination
of said witness at said time and place to be subject to continuance or adjournment from time to time
or place to place until completed.

This testimony upon oral examination will be taken on the ground and for the reason the said person
is a party to or a witness in the above entitled action, and will give evidence material to the establishment
of the defendants' case.

DATED this 23rd day of December, 19 86.

Michael J. Bond
MICHAEL J. BOND
Attorneys for Defendants

Office and Post Office Address:
800 Washington Building
Seattle, Washington.

624-7990

YAMAGUCHI & ASSOCIATES
Court Reporters
408 Central Building
Seattle, WA 98104
206-622-6875

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RECEIVED

In the Superior Court of the State of Washington,

DEC 29 1986 In and For the County of KING

MOREN,
LAGESCHULTE & CORNBL, P.S. and MICHAEL EHRLICH,
 et al.,
 Plaintiff

v.

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

No. 86-2-18429-5

AMENDED
NOTICE OF ORAL EXAMINATION
BEFORE TRIAL
 (Previously Scheduled for
 Dec. 19, 1986)

To: All Parties of Record

and to: Their Respective Counsel

FILED
 1986 DEC 30 PM 12:02
 KING COUNTY
 SUPERIOR COURT CLERK
 SEATTLE, WA

YOU, AND EACH OF YOU, WILL PLEASE TAKE NOTICE that the testimony of LARRY LEMKE, the Plaintiff above named will be taken on Oral Examination Before Trial at the instance and request of the defendants in the above entitled and numbered action, before Ernest H. Yamaguchi, Notary Public, or some other Notary Public at Adler, Giersch & Read, 1211 Smith Tower, Seattle, Washington, on Wednesday, the 31st day of December, 19 86, commencing at the hour of 10:00 o'clock, A M., on that day; the said Oral Examination of said witness at said time and place to be subject to continuance or adjournment from time to time or place to place until completed.

This testimony upon oral examination will be taken on the ground and for the reason the said person is a party to or a witness in the above entitled action, and will give evidence material to the establishment of the defendants' case.

DATED this 23rd day of December, 19 86.

Michael J. Bond
 MICHAEL J. BOND
 Attorneys for Defendants

Office and Post Office Address:
800 Washington Building
 Seattle, Washington.

624-7990

YAMAGUCHI & ASSOCIATES
 Court Reporters
 408 Central Building
 Seattle, WA 98104
 206-622-6875

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FILED

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KING COUNTY
SUPERIOR COURT CLERK

JAN 7 1997

DEPARTMENT OF
SOCIAL ADMINISTRATION

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

SANDRA EHRLICH, et al.)
)
 Plaintiffs,)
)
 v.)
)
 RALPH ASKOG, et al.,)
)
 Defendants.)

NO. 86-2-18429-5

PLAINTIFFS' ANSWER TO
DEFENDANTS' ANSWER AND
COUNTERCLAIM

COME NOW the Plaintiffs, by and through their attorney
of record, Richard H. Adler of ADLER, GIERSCH & READ, and for
Plaintiffs' Answer to Defendants' Answer and Counterclaim for
Personal Injuries in the above-captioned matter hereby:

I.

Plaintiffs incorporate by reference each and every
allegation contained in Plaintiffs' Complaint for Personal
Injuries and Damages.

II.

Plaintiffs' deny the allegations contained in paragraph
XXXVIII of Defendants' counterclaim.

III.

Plaintiffs' deny the allegations contained in paragraph
XXXIX of Defendants' counterclaim.

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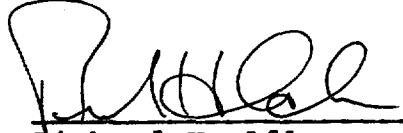
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WHEREFORE Plaintiffs request the following relief:

1. For all relief requested in Plaintiffs' Complaint for Personal Injuries and Damages;
2. For dismissal of Defendants' Answer and Counterclaim with prejudice.

DATED this 2nd day of January, 1987.

ADLER, GIERSCH AND READ, P.S.



Richard H. Adler
Attorney for Plaintiff



1987 MAR -6 PM 4:07
King County

Department of Public Safety

RETURN OF SERVICE

STATE OF WASHINGTON)	CAUSE #	<u>86 2 18429 5</u>
) ss.	DEPARTMENT OF PUBLIC SAFETY	
COUNTY OF KING)	PROCESS	<u>Summons & Complaint</u>
Ehrlich, Sandy, et vir , et al		
vs	DATE RECEIVED	<u>7-31-86</u>
Alskog, Ralph et ux, et al	DATE SERVED	<u>7-31-86 3:50 PM</u>
	DATE OF RETURN	<u>8-7-86</u>
	NAMED PARTY	<u>Ralph Alskog</u>

Douglas Reynolds says that I am a citizen of the United States and a resident of the State of Washington, over the age of eighteen years, not a party to, nor interested in any way in this action, and competent to be a witness therein. I am a duly appointed, qualified Deputy Sheriff of the DEPARTMENT OF PUBLIC SAFETY, King County, State of Washington, and was such Deputy Sheriff at all times herein mentioned. Under the statutes of the State of Washington, a Deputy Sheriff possesses the power to perform certain duties prescribed by law to be performed by the Sheriff, including serving or executing according to law all process, writs, precepts, and orders issued or made by lawful authority and to him directed.

() I received the above named process and personally served said process on the named party _____, on the date above specified, a true copy (or)
 (x) After diligent search and inquiry I was unable to find Ralph Alskog named party, so I served a person of suitable age and discretion, ~~then resident at the same address as the named party~~ delivering such copy to and leaving it with Jack A. Hicks, V. P. & Gen Mgr, assured officer that subject would be given papers
 () Upon _____ by delivering

(name of corporation)
 such true copy, personally and in person to _____
 who is a/the _____ thereof.
 at 18635 8th Ave. So., King County, State of Washington.

SHERIFF-DIRECTOR Vern Brown
 Department of Public Safety

SHERIFF'S FEES

by <u>D Reynolds</u>	Service	\$ <u>11.00</u>
King County Deputy Sheriff	Return	_____
	Mileage	_____
	Total	\$ <u>11.00</u>



King County
1987 MAR -6 PM 4:07
Department of Public Safety
KING COUNTY
SHERIFF-COUNTY CLERK
RETURN OF SERVICE

STATE OF WASHINGTON)
) ss.
COUNTY OF KING)

EHRlich, SANDY, ET IVR ET AL

CAUSE # 86 2 18429 5
DEPARTMENT OF PUBLIC SAFETY

PROCESS Summons & Complaint

DATE RECEIVED 7-31-86
DATE SERVED 7-31-86 3:50 Pm
DATE OF RETURN 8-7-86
NAMED PARTY E. Scott Harley

VS

ALSKOG, RALPH, ET UX, ET AL

Sgt. Rupert Lettich says that I am a citizen of the United States and a resident of the State of Washington, over the age of eighteen years, not a party to, nor interested in any way in this action, and competent to be a witness therein. I am a duly appointed, qualified Deputy Sheriff of the DEPARTMENT OF PUBLIC SAFETY, King County, State of Washington, and was such Deputy Sheriff at all times herein mentioned. Under the statutes of the State of Washington, a Deputy Sheriff possesses the power to perform certain duties prescribed by law to be performed by the Sheriff, including serving or executing according to law all process, writs, precepts, and orders issued or made by lawful authority and to him directed.

() I received the above named process and personally served said process on the named party _____, on the date above specified, a true copy (or)
(xx) After diligent search and inquiry I was unable to find E. Scott Harley named party, so I served a person of suitable age and discretion, ~~the xxxxxxxxxx~~ by delivering such copy to and leaving it with Jack A. Hicks, V. P. & Gen Mgr., assured officer that ~~subject~~ would be given papers
() Upon _____ by delivering

(name of corporation)
such true copy, personally and in person to _____
who is a/the _____ thereof.

at 18635 8th Ave. So., King County, State of Washington.

[Signature]
SHERIFF-DIRECTOR
Department of Public Safety

SHERIFF'S FEES

Service	\$ <u>11.00</u>
Return	_____
Mileage	_____
Total	\$ <u>11.00</u>

by [Signature]
King County Deputy Sheriff



194882
RL MS

King County
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Department of Public Safety
KING COUNTY
SUPERIOR COURT CLERK
RETURN OF SERVICE

STATE OF WASHINGTON)
) ss.
COUNTY OF KING)

EHRlich, SANDY, ET IVR ET AL

VS

ALSKOG, RALPH, ET UX, ET AL

CAUSE # 86 2 18429 5
DEPARTMENT OF PUBLIC SAFETY

PROCESS Summons & Complaint

DATE RECEIVED 7-31-86
DATE SERVED 7-31-86 3:50 Pm
DATE OF RETURN 8-7-86
NAMED PARTY E. Scott Harley

Sgt. Rupert Lettich says that I am a citizen of the United States and a resident of the State of Washington, over the age of eighteen years, not a party to, nor interested in any way in this action, and competent to be a witness therein. I am a duly appointed, qualified Deputy Sheriff of the DEPARTMENT OF PUBLIC SAFETY, King County, State of Washington, and was such Deputy Sheriff at all times herein mentioned. Under the statutes of the State of Washington, a Deputy Sheriff possesses the power to perform certain duties prescribed by law to be performed by the Sheriff, including serving or executing according to law all process, writs, precepts, and orders issued or made by lawful authority and to him directed.

() I received the above named process and personally served said process on the named party _____, on the date above specified, a true copy (or)
(xx) After diligent search and inquiry I was unable to find E. Scott Harley named party, so I served a person of suitable age and discretion, ~~the xxxxxxxxxx~~ Jack A. Hicks, V. P. & Gen Mgr. by delivering such copy to and leaving it with Jack A. Hicks, V. P. & Gen Mgr. assured officer that subject would be given papers
() Upon _____ by delivering _____ (name of corporation) such true copy, personally and in person to _____ who is a/the _____ thereof.

at 18635 8th Ave. So., King County, State of Washington.

Vern [Signature]
SHERIFF-DIRECTOR
Department of Public Safety

by Sgt. Rupert Lettich
King County Deputy Sheriff

SHERIFF'S FEES

Service	\$ <u>11.00</u>
Return	_____
Mileage	_____
Total	\$ <u>11.00</u>

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MOREN,
LAGESCHULTE & CORNELL, P.S.

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

SANDY EHRLICH and MICHAEL EHRLICH,
wife and husband; et al.,

No. 86-2-18429-5

Plaintiffs,

v.

MOTION TO COMPEL DISCOVERY

RALPH ALSKOG and ROSEMARY ALSKOG,
husband and wife; et al.,

Defendants.

I. RELIEF REQUESTED

Defendants move this court for an order compelling plaintiffs to respond to interrogatories propounded by defendants.

II. STATEMENT OF FACTS

Plaintiff Kathryn Reynolds was served with Interrogatories and Request for Production on October 22, 1986; plaintiffs Sandy Ehrlich, Michael Ehrlich, Dee Chabot, Dee Chabot as Guardian ad Litem for Shawna Michelle Chabot, Dee Chabot as Guardian ad Litem for Nicholas Sterling Chabot, and Dee Chabot as Guardian ad Litem for Michael Grant Chabot were served with Interrogatories and Request for Production on November 25, 1986. Despite requests, plaintiffs have failed to respond to the interrogatories.

III. STATEMENT OF ISSUES

Whether the court should compel plaintiffs to respond to

MOT/COMPEL - 1

LEE, SMART, COOK, MARTIN & PATTERSON, P.S., INC.
ATTORNEYS AT LAW
800 WASHINGTON BUILDING
1325 FOURTH AVENUE
SEATTLE, WASHINGTON 98101
(206) 624-7990

20

1 discovery.

2 Whether the court should award costs and attorney's fees in
3 bringing this motion.

4 IV. EVIDENCE RELIED UPON

5 The moving party relies on the subjoined affidavit of
6 Michael J. Bond.

7 V. AUTHORITY

8 Defendants rely on Civil Rules 26, 33 and 37.

9 VI. PROPOSED ORDER

10 A proposed form of order accompanies this motion.

11 DATED this 4 day of March, 1987.

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

14 By Michael J. Bond
15 MICHAEL J. BOND of Attorneys
for Defendants

16 STATE OF WASHINGTON)
17) ss.
18 COUNTY OF KING)

19 MICHAEL J. BOND, being first duly sworn, upon oath deposes
20 and says:

21 Plaintiff Kathryn Reynolds was served with Interrogatories
22 and Request for Production on October 22, 1986; plaintiffs Sandy
23 Ehrlich, Michael Ehrlich, Dee Chabot, Dee Chabot as Guardian ad Litem
24 for Shawna Michelle Chabot, Dee Chabot as Guardian ad Litem for
25 Nicholas Sterling Chabot, and Dee Chabot as Guardian ad Litem for

MOT/COMPEL - 2

LEE, SMART, COOK, MARTIN & PATTERSON, P.S., INC.
ATTORNEYS AT LAW
800 WASHINGTON BUILDING
1925 FOURTH AVENUE
SEATTLE, WASHINGTON 98101
(206) 624-7880

1 Michael Grant Chabot were served with Interrogatories and Request for
2 Production on November 25, 1986. To date, I have received no answers
3 from plaintiffs to the interrogatories propounded to them.

4 The reasonable attorney's fees incurred in preparing this
5 motion and appearing for argument are \$250.00.

6 FURTHER YOUR AFFIANT SAYETH NAUGHT.

7 Michael J. Bond
8 MICHAEL J. BOND

9 SUBSCRIBED and SWORN to before me this 4th day of
10 March, 1987.

11 Judi L. Wright
12 NOTARY PUBLIC in and for the
13 State of Washington.
14 My Appointment Expires: 10/31/89

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

SANDY EHRLICH and MICHAEL EHRLICH,)
wife and husband; et al.,)

No. 86-2-18429-5

Plaintiffs,)

v.)

ORDER TO COMPEL DISCOVERY

RALPH ALSKOG and ROSEMARY ALSKOG,)
husband and wife; et al.,)

Defendants.)

THIS MATTER having come on regularly for hearing before the undersigned on the Motion to Compel Discovery by the defendants herein;

Defendants being represented by Michael J. Bond of Lee, Smart, Cook, Martin & Patterson, P.S., Inc., the plaintiffs being represented by Richard H. Adler of Adler, Giersch & Read;

The court having reviewed the motion and affidavit of Michael J. Bond,

having heard argument of counsel and being otherwise duly informed in the premises, the court does hereby

ORDER, ADJUDGE AND DECREE as follows:

That plaintiff Kathryn Reynolds shall answer the interrogatories propounded on October 22, 1986 within five (5) days

1 of the date of entry of this order; that plaintiffs Sandy Ehrlich,
2 Michael Ehrlich, Dee Chabot, Dee Chabot as Guardian ad Litem for
3 Shawna Michelle Chabot, Dee Chabot as Guardian ad Litem for Nicholas
4 Sterling Chabot, and Dee Chabot as Guardian ad Litem for Michael
5 Grant Chabot shall answer the interrogatories propounded on November
6 25, 1986 within five (5) days of the date of entry of this order.

7 Defendants shall be awarded costs in the amount of \$250.00.

8
9

JUDGE/COURT COMMISSIONER

10 Presented by:

11 LEE, SMART, COOK, MARTIN & PATTERSON

12

MICHAEL J. BOND, of Attorneys for
13 Defendants

14 Copy Received, Approved as to Form,
15 Notice of Presentation Waived:

16 ADLER, GIERSCH & READ

17

Richard H. Adler, of Attorneys for
18 Plaintiffs

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25 ORDER - 2

LEE, SMART, COOK, MARTIN & PATTERSON, P.S., INC.
ATTORNEYS AT LAW
800 WASHINGTON BUILDING
1925 FOURTH AVENUE
SEATTLE, WASHINGTON 98101
(206) 624-7980

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MOREN,
LAGESCHULTE & CORNELL, P.S.



SUPERIOR COURT OF
COUNTY OF KING

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ADLER, GIB...

SANDY EHRLICH and MICHAEL EHRLICH,
wife and husband, et al
v. Plaintiffs,
RALPH ALSKOG and ROSEMARY ALSKOG,
husband and wife, et al., Defendants.

NO. 86-2-18429-5

NOTE FOR CIVIL MOTION CALENDAR
(Clerk's Action Required)

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

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 Civil Motion Calendar.

DATE OF HEARING: Thursday / March 19, 1987
(Day of Week) (Calendar Date)

TIME OF HEARING: [X] 9:30 a.m. [] 1:30 p.m.
[] Summary Judgments [] Supplemental Proceedings
[X] Civil Motions

PLACE OF HEARING: KING COUNTY SUPERIOR COURT

NATURE OF MOTION: MOTION TO COMPEL DISCOVERY

DATED: March 4, 1987

Michael J. Bond

Typed Name: MICHAEL J. BOND

OF: LEE, SMART, COOK, MARTIN & PATTERSON

Attorney For: Defendants

OTHER PARTIES REQUIRING NOTICE: Phone: 624-7990

Fill In & Check Box If Backside Is Used []

Name: Richard H. Adler Name:

Address: 1211 Smith Tower Address:

Seattle, WA 98104

Phone: 682-4267 Phone:

Attorney For: Plaintiffs Attorney For:

LEE, SMART, COOK, MARTIN & PATTERSON, P.S., INC.
ATTORNEYS AT LAW
800 WASHINGTON BUILDING
1925 FOURTH AVENUE
SEATTLE, WASHINGTON 98101
(206) 624-7990

NOTE FOR CIVIL MOTION CALENDAR

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KING COUNTY
SUPERIOR COURT

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

SANDRA EHRLICH, et al.)
)
 Plaintiffs,)
)
 v.)
)
 RALPH ALSKOG, et al.,)
)
 Defendants.)

NO. 86-2-18429-5
DECLARATION OF RICHARD H. ADLER IN OPPOSITION TO MOTION TO COMPEL DISCOVERY

RICHARD H. ADLER declares and says:

I am competent and willing to testify to the following facts and circumstances.

I am the attorney for the above-named plaintiffs. The attached Motion to Compel Discovery was received March 5, 1987.

According to King County Local Rule 37(e) "the court will not entertain any motion or objection with respect to Rules 26 through 37 of the Rules of Civil Procedure, unless it affirmatively appears that counsel have met and conferred with respect thereto. Counsel for the moving or objecting party shall arrange such a conference (emphasis added). Please see attached.

22

DECLARATION IN OPPOSITION TO MOTION TO COMPEL - Page 1

LAW OFFICES OF
ADLER, GIERSCH, AND READ, P.S.
211 SMITH TOWER
SEATTLE, WA 98104
(206) 682-4267

1 Declarant has not received any notice of, nor has he
2 participated in, any LR 37(e) conference with defense counsel.

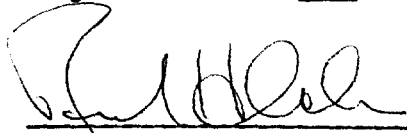
3 Defendants' Motion to Compel Discovery does not comply
4 with LR 37(f) which states: At the time of noting motion or
5 objection, counsel for moving or objecting party shall serve and
6 file a certificate of compliance with this rule and enumerate
7 therein the matters remaining for disposition by the Court
8 (emphasis added). See attached.

9 Defendants' Certificate of Compliance was not received
10 with the Motion to Compel Discovery documents delivered
11 March 5, 1987.

12 Due to the lack of an LR 37(e) conference and of an LR
13 37(f) Certificate of Compliance, the Defendants have not
14 complied with the Local Rules of the Superior Court for King
15 County. Therefore plaintiffs respectively request that
16 defendants' Motion to Compel Discovery be stricken and
17 terms/costs be awarded in the amount of \$250.00.

18 I DECLARE UNDER PENALTY OF PERJURY UNDER THE LAWS OF
19 THE STATE OF WASHINGTON THAT THE FOREGOING IS TRUE AND CORRECT.

20 DATED at Seattle, Washington this 13th day of March,
21 1987.

22 
23 _____
24 RICHARD H. ADLER
25 Attorney for Plaintiffs
26
27
28

DECLARATION IN OPPOSITION
TO MOTION TO COMPEL - Page 2

LAW OFFICES OF
ADLER, GIERSCH, AND READ, P.S.
1211 SMITH TOWER
SEATTLE, WA 98104
(206) 682-4267

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KING COUNTY
SUPERIOR COURT CLERK
SEATTLE, WA

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

In re the Matter of the)
Guardianship of)
)
SHAWNA MICHELLE CHABOT, a Minor,)
MICHAEL GRANT CHABOT, a Minor, and))
NICHOLAS STERLING CHABOT, a Minor)
)

86-2-18429 5
NO.

PETITION FOR APPOINTMENT
OF GUARDIAN AD LITEM

COMES NOW Dee Chabot and moves this court for an order appointing Dee Chabot as Guardian ad Litem for her children, Shawna Michelle Chabot, Michael Grant Chabot, and Nicholas Sterling Chabot, pursuant to RCW 4.08.050. Shawna Michelle Chabot, born 1-14-75; Michael Grant Chabot, born 2-4-76; and Nicholas Sterling Chabot, born 2-13-81, are the minor children of Dee and Grant Chabot. Said minor children reside with their mother in King County, Washington. Said minor children have a cause of action arising out of torts of outrage, counselor malpractice, negligent counseling, pastoral and ministerial malpractice, defamation, loss of parent-child relationship, wrongful disfellowshipment; the minor children's mother, Dee Chabot, is a fit and proper person to represent their interests in the litigation or settlement of said cause of action. Said minor children are not represented by any other guardians and

23
169

1 have never previously been named as a party or witness in any
2 other legal proceedings.

3 DATED: July 31, 1986

4 Dee Chabot
5 Dee Chabot

6 I DECLARE UNDER PENALTY OF PERJURY UNDER THE LAWS OF
7 THE STATE OF WASHINGTON THAT THE FOREGOING IS TRUE AND CORRECT
8 TO THE BEST OF MY KNOWLEDGE AND ABILITY.

9 DATED at Seattle, Washington this 31 day of July,
10 1986.

11 Dee Chabot
12 Dee Chabot

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1987 JUN 29 AM 11:56

KING COUNTY
SUPERIOR COURT CLERK
SEATTLE, WA

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

In re the Matter of the)
Guardianship of)
SHAWNA MICHELLE CHABOT, a Minor,)
MICHAEL GRANT CHABOT, a Minor, and)
NICHOLAS STERLING CHABOT, a Minor)

86-2-18429
NO. ORDER APPOINTING
GUARDIAN AD LITEM

Based upon the petition of Dee Chabot and the files and records in this matter, the court finds as follows:

1. Shawna Michelle Chabot, Michael Grant Chabot, and Nicholas Sterling Chabot are minor children having an interest in a cause of acting arising from torts of outrage, counselor malpractice, negligent counseling, pastoral and ministerial malpractice, defamation, loss of parent-child relationship, wrongful disfellowshipment.

2. The minors, Shawna Michelle Chabot, Michael Grant Chabot, and Nicholas Sterling Chabot, reside with their mother, Dee Chabot, and the petitioner for appointment of a Guardian ad Litem, Dee Chabot, is qualified to represent the minors as Guardian ad Litem.

Based upon the foregoing, it is hereby ordered as follows:

[Handwritten signature]

1 1. That Dee Chabot is appointed as Guardian ad Litem
2 to represent Shawna Michelle Chabot, Michael Grant Chabot, and
3 Nicholas Sterling, minors.

4 2. Said Guardian ad Litem is authorized to represent
5 Shawna Michelle Chabot, Michael Grant Chabot, and Nicholas
6 Sterling with reference to the alleged cause of action for torts
7 of outrage, counselor malpractice, negligent counseling,
8 pastoral and ministerial malpractice, defamation, loss of
9 parent-child relationship, wrongful disfellowshipment.


10 3. The Guardian ad Litem shall report to the court
11 for approval to settle or receive compensation for services
12 rendered with regard to the claim.

13 DATED: JUL 31 1986

14 
15 Judge/Court Commissioner

16 Presented by:

17 ADLER, GIERSCHE AND READ

18 
19 RICHARD H. ADLER
20 Attorney at Law

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FILED

1987 JUN 29 AM 11:56

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

86-2-18429 5

In re the Matter of the
Guardianship of)

NO. 86-2-18429

SYBIL LEMKE, a Minor)

PETITION FOR APPOINTMENT
OF GUARDIAN AD LITEM

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COMES NOW Larry Lemke and moves this court for an order appointing Larry Lemke as Guardian ad Litem for his daughter, Sybil Lemke, pursuant to RCW 4.08.050. Sybil Lemke is the daughter of Larry Lemke, and is a minor, 14 years of age (date of birth: 10-18-71). Sybil Lemke resides with her father in King County, Washington. Said minor child has a cause of action arising out of torts of outrage, counselor malpractice, negligent counseling, pastoral and ministerial malpractice, defamation, loss of parent-child relationship, wrongful disfellowshipment; the minor's father, Larry Lemke, is a fit and proper person to represent her interests in the litigation or settlement of said cause of action. Said minor is not represented by any other guardians and has never previously been named as a party or witness in any other legal proceedings.

DATED: 7-31-86

Larry Lemke
Larry Lemke

I DECLARE UNDER PENALTY OF PERJURY UNDER THE LAWS OF THE STATE OF WASHINGTON THAT THE FOREGOING IS TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE AND ABILITY.

DATED at Seattle, Washington this 31 day of July, 1986.

Larry Lemke
Larry Lemke

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FILED

1987 JUN 29 AM 11: 57

KING COUNTY
SUPERIOR COURT CLERK
SEATTLE, WA

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

In re the Matter of the
Guardianship of

SYBIL LEMKE, a Minor

NO.

ORDER APPOINTING
GUARDIAN AD LITEM

86-2-18429 R

Based upon the petition of Larry Lemke and the files
and records in this matter, the court finds as follows:

1. Sybil Lemke is a minor having an interest in a
cause of acting arising from alleged sexual conduct by Robert
Howardton and is not represented by a guardian.

2. The minor, Sybil Lemke, resides with her father,
Larry Lemke, and the petitioner for appointment of a Guardian ad
Litem, Larry Lemke, is qualified to represent the minor as
Guardian ad Litem.

Based upon the foregoing, it is hereby ordered as
follows:

1. That Larry Lemke is appointed as Guardian ad Litem
to represent Sybil Lemke, a minor.

2. Said Guardian ad Litem is authorized to represent
Sybil Lemke with reference to the alleged cause of action for
sexual contact and abuse suffered by the minor.

ORDER APPOINTING GUARDIAN
AD LITEM - Page 1

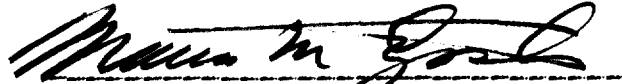
LAW OFFICES OF
ADLER, GIERSCH, AND READ
211 SMITH TOWER
SEATTLE, WA 98104
(206) 622-4267

92

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1 3. The Guardian ad Litem shall report to the court
2 for approval to settle or receive compensation for services
3 rendered with regard to the claim.

4 DATED: JUL 31 1986

5 
6 Judge/Court Commissioner

7 Presented by:

8 ADLER, GIERSCH AND READ
9 

10 RICHARD H. ADLER
11 Attorney at Law
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SUPERIOR COURT OF WASHINGTON
COUNTY OF

1987 AUG -3 PM 4:17

KING COUNTY
SUPERIOR COURT CLERK
SEATTLE, WA

MOREN,
LAWRENCE & CORNELL, P.S.

NO. 86-2-18429-5

SANDY EHRLICH, et al.,
Plaintiffs,

v.

RALPH ALSKOG, et al.,
Defendants.

STATEMENT OF ARBITRABILITY
AND NOTE FOR TRIAL SETTING
(Clerk's Action Required)

TO: The Clerk of the Court and to all Lawyers listed on reverse side:

I. STATEMENT OF ARBITRABILITY [LMAR 2.1(a)]

1.1 [] This case is subject to arbitration because the sole relief sought is a money judgment, and it involves no claim in excess of \$25,000.00 exclusive of lawyer's fees, interest and costs. [MAR 1.2]

1.2 [] The undersigned contends that its claim exceeds \$25,000.00, but for purposes of arbitration waives any claim in excess of \$25,000.00.

1.3 [X] This case is NOT subject to mandatory arbitration because:

- (a) [X] Plaintiff's claim exceeds \$25,000.00.
- (b) [] Plaintiff seeks relief other than a money judgment.
- (c) [] Defendant's counter or cross claim exceeds \$25,000.00.
- (d) [] Defendant's counter or cross claim seeks relief other than a money judgment.
- (e) [] Case is an appeal from a lower court.

II. NOTE FOR CIVIL TRIAL DOCKET [LR 40]

(Case will not be set for trial unless Statement is filled in above.)

2.1 Nature of Case: Personal Injury

2.2 Estimated Length of Trial in Hours: _____ Days: 15

2.3 Readiness: The undersigned lawyer certifies this case to be an issue in that all pleadings are on file and no affirmative pleadings are unanswered.

DATED: July 8, 1987

Signed [Signature]

Important: Type Names and Addresses of all other Lawyers on reverse side.

W.S.B.A.* _____

Typed Name Richard H. Adler

Lawyer for Plaintiffs

Serve all parties; file with CALENDAR CONTROL, E-609, King County Courthouse, MA1(7/85)

STATEMENT OF ARBITRABILITY & NOTE
SCOMIS: NTTSA\NTTSNA

LAW OFFICES OF
ADLER, GIERSCH, AND READ
1621 Smith Tower
SEATTLE WA 98104
(206) 682-4267

[Handwritten initials]

Michael Bond
800 Washington Bldg.
Seattle, Washington 98101

Phone No.: 624-7990

Michael Bugni
Attorney at Law
11320 Roosevelt NE
Seattle, Washington 98125

Phone No.: 365-5500

FILED

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KING COUNTY
SUPERIOR COURT CLERK
SEATTLE, WA

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

SANDY EHRlich <u>et al.</u>)	
)	NO. 86-2-18429-5
Plaintiff,)	
v.)	NOTICE OF ASSOCIATION
)	OF COUNSEL
RALPH ALSKOG <u>et al.</u>)	
)	
Defendants.)	

TO: The Clerk of the King County Superior Court


AND TO: Michael Bond, 800 Washington Building, Seattle, Washington, 98101, Attorney for Defendants

AND TO: Michael Bugni, 11320 Roosevelt Way NE, Seattle, Washington, 98125, Attorney for Defendants

PLEASE TAKE NOTICE that the firm of Messina Duffy have associated with Adler, Giersch and Read, P.S., as counsel for Plaintiff's. All further documents and pleadings should be directed to both Plaintiff's counsel.

DATED this 31 day of July, 1987.

MESSINA DUFFY



JOHN MESSINA
4002 Tacoma Mall Blvd., Suite 200
Tacoma, Washington 98409
(206) 472-6000

NOTICE OF ASSOCIATION
OF COUNSEL
(ehrlsalh/d:1)

LAW OFFICES OF
ADLER, GIERSCH AND READ, P.S.
1621 SMITH TOWER
SEATTLE, WA 98104
(206) 682-4267

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RECEIVED

AUG 27 1987

In the Superior Court of the State of Washington

AUG 28 1987

In and For the County of KING

CLERK, GIERSCH, ...

FILED 1987 AUG 28 PM 4:15

MOREN, LAGESCHULTE & CORNELL, P.S.

YAMAGUCHI & ASSOC COPY RECEIVED

DATE 1/21

ORIGINAL

SANDY EHRLICH and MICHAEL EHRLICH wife and husband; et al.,

Plaintiffs

v.

RALPH ALSKOG and ROSEMARY ALSKOG, husband and wife; et al.,

Defendants.

KING COUNTY SUPERIOR COURT CLERK SEATTLE, WA

No. 86-2-18429-5

SUBPOENA DUCES TECUM

THE STATE OF WASHINGTON, TO: The Records Custodian for

GREETINGS: THOMAS E. HULSE, III, M.D.

YOU ARE HEREBY COMMANDED to be and appear at the offices of Thomas E. Hulse, III, M.D., 15211 Eighth Avenue South

Seattle, Washington, on Wednesday, the 16th day of September, 1987, commencing at the hour of 9:30 o'clock A.M. on said day, then and there to testify as a witness in behalf of the defendants

in the above-entitled cause, and to remain in attendance upon the undersigned or any other Notary Public until discharged. AND YOU ARE FURTHER COMMANDED to bring with you at said time and place the following instruments, papers, and documents, to-wit:

All records, files, notes charts, admission sheets, discharge sheets, laboratory test reports, x-rays, and any and all medical records in the possession of Dr. Hulse, including notes, pertaining to the care, treatment and medications provided to MICHAEL STEVEN EHRLICH.

HEREIN FAIL NOT AT YOUR PERIL.

WITNESS my hand and official seal this day of 19

Signature of Notary Public

Notary Public in and for the State of Washington, residing at Seattle.

Commission Expires 4-5-91

YAMAGUCHI & ASSOCIATES Court Reporters 408 Central Building Seattle, WA 98104 206-622-6875

29 DA

RECEIVED

In the Superior Court of the State of Washington AUG 27 1987

AUG 28 1987

In and For the County of KING

MOREN, LAGESCHULTE & CORNELL, P.S.

PLAINTIFFS: GIERSCHE, SANDY EHRLICH and MICHAEL EHRLICH, et al.,

v.

DEFENDANTS: RALPH ALSKOG, et ux., et al., Defendant

FILED 1987 AUG 28 PM 4:15 86-2-18429-5

NOTICE OF ORAL EXAMINATION BEFORE TRIAL KING COUNTY SUPERIOR COURT CLERK SEATTLE, WA.

YAMAGUCHI & ASSOC. COPY RECEIVED DATE 8/28

To: All Parties of Record

and to: Their Respective Counsel

YOU, AND EACH OF YOU, WILL PLEASE TAKE NOTICE that the testimony of the Records Custodian of Thomas E. Hulse, III, M.D., ~~the xxxxxxxxxxxxxxxxxxxxxxxxxx above named~~ will be taken on Oral Examination Before Trial at the instance and request of the defendants in the above entitled and numbered action, before Ernest H. Yamaguchi, Notary Public, or some other Notary Public at 15211 Eighth Avenue South, Seattle, Washington, on Wednesday, the 16th day of September 1987, commencing at the hour of 9:30 o'clock, A.M., on that day; the said Oral Examination of said witness at said time and place to be subject to continuance or adjournment from time to time or place to place until completed.

This testimony upon oral examination will be taken on the ground and for the reason the said person is a party to or a witness in the above entitled action, and will give evidence material to the establishment of the defendants' case.

DATED this 26th day of August, 1987.

Michael J. Bond MICHAEL J. BOND Attorneys for Defendants

Office and Post Office Address:

800 Washington Building Seattle, Washington.

624-7990

YAMAGUCHI & ASSOCIATES Court Reporters 408 Central Building Seattle, WA 98104 206-622-6875

30 DA

In the Superior Court of the State of Washington,

RECEIVED

AUG 27 1987

AUG 28 and For the County of KING

SANDY EHRLICH and MICHAEL EHRLICH,
et al.,

Plaintiff

v.

RALPH ALSKOG, et ux.,
et al.,

Defendant

1987 AUG 28 PM 4: 15

KING COUNTY No. 86-2-18429-5

SUPERIOR COURT CLERK
SEA NOTICE OF ORAL EXAMINATION

BEFORE TRIAL

MOREN,
LAGESCHULTE & CORNELL, P.S.

ORIGINAL

YAMAGUCHI & ASSOCIATES
COPY RECEIVED

DATE 8/28

To: All Parties of Record

and to: Their Respective Counsel

YOU, AND EACH OF YOU, WILL PLEASE TAKE NOTICE that the testimony of the Records Custodian for David R. Penner, Ph.D., ~~the above named~~ will be taken on Oral Examination Before Trial at the instance and request of the defendants in the above entitled and numbered action, before Ernest H. Yamaguchi, Notary Public, or some other Notary Public at 12844 Military Road South Seattle, Washington, on Wednesday, the 16th day of September 19 87, commencing at the hour of 10:30 o'clock, A. M., on that day; the said Oral Examination of said witness at said time and place to be subject to continuance or adjournment from time to time or place to place until completed.

This testimony upon oral examination will be taken on the ground and for the reason the said person is a party to or a witness in the above entitled action, and will give evidence material to the establishment of the defendants' case.

DATED this 26th day of August, 19 87.

Michael J. Bond
MICHAEL J. BOND
Attorneys for Defendants

Office and Post Office Address:

800 Washington Building
Seattle, Washington.

624-7990

YAMAGUCHI & ASSOCIATES
Court Reporters
408 Central Building
Seattle, WA 98104
206-622-6875

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AUG 27 1987

In the Superior Court of the State of Washington,

In and For the County of KING

AUG 28

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MOREN, LAGESCHULTE & CORNELL, P

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KING COUNTY DATE
SUPERIOR COURT CLERK
SEATTLE, WA
No. 86-2-18429-5

ORIGINAL

SANDY EHRLICH and MICHAEL EHRLICH,
wife and husband; et al.,

Plaintiffs,

v.

RALPH ALSKOG and ROSEMARY ALSKOG,
husband and wife; et al.,

Defendants.

SUBPOENA DUCES TECUM

THE STATE OF WASHINGTON, TO: The Records Custodian for

GREETINGS: DAVID R. PENNER, Ph.D.

YOU ARE HEREBY COMMANDED to be and appear at the offices of
David R. Penner, PH.D., 12844 Military Road South,
Seattle, Washington, on Wednesday, the 16th day of
September, 1987, commencing at the hour of 10:30 o'clock A.M. on said
day, then and there to testify as a witness in behalf of the defendants
in the above-entitled cause, and to remain in attendance upon the undersigned or any other Notary
Public until discharged. AND YOU ARE FURTHER COMMANDED to bring with you at said time and
place the following instruments, papers, and documents, to-wit:

All records, files, notes charts, admission sheets, discharge
sheets, laboratory test reports, x-rays, and any and all medical
records in the possession of Dr. Penner, including notes,
pertaining to the care, treatment and medications provided to
SANDRA RAE EHRLICH.

HEREIN FAIL NOT AT YOUR PERIL.

WITNESS my hand and official seal this 26th day of August, 1987

Signature
Notary Public in and for the State of Washington,
residing at Seattle.

Commission Expires 4.5.91

YAMAGUCHI & ASSOCIATES
Court Reporters
408 Central Building
Seattle, WA 98104
206-622-6875

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

SANDY EHRLICH and MICHAEL)
EHRLICH, et al.)
)
) Plaintiffs,)
)
) v.)
)
) RALPH ALSKOG and ROSEMARY)
) ALSKOG,)
)
) Defendants.)
)
)

NO. 86-2-18429-5

SUPPLEMENTAL ANSWERS
TO INTERROGATORIES
AND REQUEST FOR
PRODUCTION DIRECTED
TO PLAINTIFF DEE
CHABOT

ANSWER TO INTERROGATORY NO. 10:

- 1. Seattle Indian Health Board
1122 - 12th S.
Seattle, Washington

I do not recall the approximate dates of visit but I
was there in 1983 for Bronchitis and TB.

- 2. University Hospital
1959 N. Pacific
Seattle, Washington

I was there in January 1975 for the birth of my
daughter Shawna.

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3. Group Health Hospital
700 15th Avenue E.
Seattle, Washington

I was there in February 1981 for the birth of my son
Nicholaus and Michael's birth in February 1976.

4. Marine View Hospital
(now known as: Pacific Medical Center)
1200 12th South
Seattle, Washington

I was there in February 1980 for my first knee surgery.

5. Frederick Davis, M.D.
13100 Military Road S.
Seattle, Washington

I was there approximately in 1981 to 1982 for
consultation regarding my knee.

6. Dr. Collins
Wenatchee, Washington

I do not have his address. I consulted with him
regarding my knee surgery.

ANSWER TO INTERROGATORY NO 11:

As stated in the Complaint for Personal Injuries and Damages.
More specifically, my injuries include break-up of my marriage,
family disharmony, loss of consortium, depression, anxiety,
destruction of parent-child relationship, loss of
companionship/love/guidance/support for the children,

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2 humiliation, defamation, loss of reputation, embarrassment,
3 extreme financial problems and severe emotional distress.

4 ANSWER TO INTERROGETORY NO. 16:

5 I have incurred \$290.00 with David R. Penner, Ph.D of Christa
6 Counseling Services.

7 ANSWER TO INTERROGATORY 18:

8 1. Don Elderidge
9 13238 4th Avenue SW
10 Seattle, Washington 98146

11 Don repaired my drier twice when it broke down. It cost me
12 approximately \$140.00 for him to come out and repair this.
13 Normally, my husband would have repaired it himself. This
14 occurred in approximately in January 1987.

15 2. Leroy Anderson

16 I do not have his current address. He came to my house around
17 January 1987 to install a toilet in one of our bathrooms in the
18 house. This cost me approximately \$60.00. Again, my husband
19 would have done this work.

20 3. Mike Sabourin

21 18727 4th Avenue S.
22 Seattle, Washington 98148

23 Mike fixed a leaky faucet. I paid for parts which came to
24 approximately \$10.00. This occurred approximate two to three
25 months ago.

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ANSWER TO INTERROGATORY NO. 20:

My injuries as stated in the Complaint are on-going. There has been no new or subsequent injuries.

ANSWER TO INTERROGATORY NO. 24:

No.

ANSWER TO INTERROGATORY NO. 32:

See attached list.

ANSWER TO INTERROGATORY NO. 35:

I am unsure of what you mean by "physical condition." However, my injuries are described in my supplemental answer to interrogatory number 11. Those injuries still persist and I am unsure when it will end, if ever.

ANSWER TO INTERROGATORY NO. 37:

David Penner, Ph.D and Dr. Reed David of Christa Counseling Services.

ANSWER TO INTERROGATORY NO. 39:

No. Without waiving this objection.

ANSWER TO INTERROGATORY NO. 44:

On March 30, 1986, the church bulletin went around to the congregation indicating that I had been disfellowshipped. There were several scriptures that were printed as the basis of my being disfellowshipped. These scriptures concern those who are sinful, commit adultery, etc. This bulletin was passed around to all the congregation, so everyone knew about it.

Also, when someone is disfellowshipped, Don Barnett would state it either at the services and/or would publicly announce to the

Answer to Interrogatory No. 32:

George and Diana Alberts
20417 - 10th S.
Seattle, Washington 98148

George - Insurance Agent
Diana - Secretary

Michael and Maureen Sabourin
18727 - 4th Avenue S.
Seattle, Washington 98148

Michael - Boeing (Aeronautical)
Maureen - Housewife

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

Michael - Sales for Cont. Artic
Pede - Housewife

David and Nancy Dobbs
25642 - 46th S.
Kent, Washington 98032

David - Attorney
Nancy - Housewife

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

Tony - Post Office
Debbie - Housewife

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

Bruce - Truck driver
Stella - Housewife

Page Two

Answer to Interrogatory No. 32:

Mike and Sandy Ehrlich
29603 - 18th S.
Federal Way, Washington 98003

Mike - Custodian
Sandy - Housewife

David Penner, Ph.D.
12844 Military Road S.
Seattle, Washington 98168

Psychologist

Detective Larry Daley
Public Safety Building
Seattle, Washington 98104

Detective

Sandy Riley
140 SW 208th
Seattle, Washington 98166

Housewife

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

Dan - Salesman
Carol - Housewife

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

Housewife

Page Three

Answer to Interrogatory No. 32:

Allen and Linda Steinhauer
829 S. 194th
Seattle, Washington 98148

Allen - Boeing
Linda - Housewife

Dan and Pam Barnett
4700 - 173rd Avenue SE
Issaquah, Washington 98027

Dan - Stockbroker
Pam - Housewife

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

Tom - Attorney
Claudia - Dental Assistant

Ramona Barrios
8402 Delridge Way SW, #202
Seattle, Washington 98106

Housewife

Lynn Sutherland
25225 36th Place South
Kent, Washington 98032

Bookkeeper

Pastor George Page
Des Moines Assembly of God

Winnie Burton
236 SW 191st
Seattle, Washington 98166

Housewife

Page Four

Answer to Interrogatory No. 32:

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

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

CASA Caseworker

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congregation not to associate with the disfellowshipped members. I do not know if this was done in my case since I was not allowed to attend services, but based on Don Barnett's past practices, I believe he made that announcement.

STATE OF WASHINGTON)
) ss.
COUNTY OF KING)

The undersigned, being first duly sworn, on oath, deposes and says:

That I have read the foregoing Supplemental Answers to Interrogatories and Request for Production, know the contents thereof, and believe the same to be true.

Dee Chabot
Dee Chabot

SUBSCRIBED AND SWORN to before me this 31st day of August, 1987.

James Olmstead
Notary Public in and for the State of Washington; My Commission Expires: 03-20-89

FILED

1987 SEP -1 AM 11: 54

KING COUNTY
SUPERIOR COURT CLERK
SEATTLE, WA

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

SANDY EHRLICH and MICHAEL)
EHRLICH, husband and wife,)
et al.,)
)
Plaintiffs,)
)
v.)
)
RALPH ALSKOG and ROSEMARY)
ALSKOG, husband and wife, et al.)
)
Defendants.)
)
)

NO. 86-2-18429-5
SUPPLEMENTAL ANSWERS
TO INTERROGATORIES
AND REQUEST FOR
PRODUCTION DIRECTED
TO PLAINTIFF SHAWNA
CHABOT

ANSWER TO INTERROGATORY NO. 8:

1. Dr. Neil Duncanson
14212 Ambaum Blvd. SW
Seattle, Washington 98166

I do not recall when Shawna last saw Dr. Duncanson, but he has been her family doctor. Last visit may have been June, 1986.

2. Dr. Reed Davis, Ph.D.
12844 Military Rd. S.
Seattle, Washington 98168

Shawna has seen Dr. Reed Davis for counseling from December 1986 through February, 1987.

SUPPLEMENTAL ANSWERS TO INTERROGATORIES
- SHAWNA CHABOT
chabsh1b/d1/clh - Page 1

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ANSWER TO INTERROGATORY NO. 9:

Depression, anxiety, hurt, rejection, anger, destruction of parent-child relationship, loss of consortium/love/guidance/support from my parents, severe emotional distress.

ANSWER TO INTERROGATORY NO. 14:

Approximately \$80.00-\$100.00 for counseling with Dr. Reed Davis. Dr. Davis says further counseling is necessary.

ANSWER TO INTERROGATORY NO. 16:

Other than the injuries listed in supplemental interrogatory number 9, I have had no new major subsequent sicknesses, injuries or diseases.

ANSWER TO INTERROGATORY NO. 17:

No new major subsequent injuries.

ANSWER TO INTERROGATORY NO. 23:

1. Dr. Reed Davis; 12844 Military Road S., Seattle, Washington, 98168, oral.
2. Mark Ungar (oral)
King County Courthouse
W321 King County Courthouse
Seattle, Washington 98104

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3. Bob Thorndosen (oral)
KOMO TV
100 - 14th Avenue N.
Seattle, Washington

ANSWER TO INTERROGATORY NO. 33:

Shawna's father, Brian, has repeatedly told Shawna that her mother is possessed by a demon and that it has been her mother's fault for their situation. Brian's explanation comes from church teachings.

STATE OF WASHINGTON)
) ss.
COUNTY OF KING)

The undersigned being first duly sworn, on oath, deposes and says:

That I have read the foregoing Supplemental Answers to Interrogatories and Request for Production, know the contents thereof, and believe the same to be true.

Sue Chabot Guardian for *Shawna Chabot*
Shawna Chabot

SUBSCRIBED AND SWORN to before me this 31st day of August, 1987.

Imera Sue Morrison
Notary Public in and for the State
of Washington; My Commission
Expires: May 21, 1991

SUPPLEMENTAL ANSWERS TO INTERROGATORIES
- SHAWNA CHABOT
chabsh1b/d1/clh - Page 3

FILED

1987 SEP -1 AM 11: 54

KING COUNTY
SUPERIOR COURT CLERK
SEATTLE, WA

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

8	SANDY EHRLICH and MICHAEL EHRLICH,))
	husband and wife, et al.))
9)
	Plaintiffs,))
10)
	v.))
11	RALPH ALSKOG and ROSEMARY))
12	ALSKOG, husband and wife,))
	et al.,))
13)
	Defendants.))
14)

NO. 86-2-18429-5

SUPPLEMENTAL ANSWERS
TO INTERROGATORIES
AND REQUEST FOR
PRODUCTION DIRECTED
TO PLAINTIFF
NICHOLAS CHABOT

ANSWER TO INTERROGATORY NO. 8:

Dr. Duncanson
14212 Ambaum Blvd. SW
Seattle, Washington 98166

Dr. Duncanson is Nicholas' family doctor and his last visit was approximately three months ago for a fever.

ANSWER TO INTERROGATORY NO. 9:

Depression, anxiety, destruction of parent-child relationship, loss of companionship/love/guidance and support from my parents, severe emotional distress, rejection.

SUPPLEMENTAL ANSWERS TO INTERROGATORIES
- NICHOLAS CHABOT
chabnilb/d1/clh - Page 1

33 *mm*

LAW OFFICES OF
ADLER, GIERSCH AND READ, P.S.
1621 SMITH TOWER
SEATTLE, WA 98104
(206) 682-4267

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ANSWER TO INTERROGATORY NO. 14:

No medical/hospital expenses at this point. However, Dr. Reed Davis told Dee that Nicholas needs counseling.

ANSWER TO INTERROGATORY NO. 16:

Other than the injuries listed in supplemental interrogatory number 9, I have had no new major subsequent sicknesses, injuries or diseases.

ANSWER TO INTERROGATORY NO. 17:

Again, no new major subsequent injuries.

INTERROGATORY NO. 23:

1. Michael and Maureen Sabourin (oral)

18727 - 4th Avenue S.

Seattle, Washington 98148

Michael is employed with Boeing. I do not know his occupation.

2. Mark and Pede Grubbs (oral)

I do not have their address, but their phone number is 859-3204. They live in Kent, Washington. Mark is employed with

Continetal Artic, I do not know his occupation.

3. Detective Larry Dailey (oral)

Seattle Police Department

Seattle, Washington

SUPPLEMENTAL ANSWERS TO INTERRGATORIES

- NICHOLAS CHABOT

chabnilb/d1/clh - Page 2

1
2 4. Mark Unger (oral)
3 CASA Worker
4 King County Superior Court
5 W 321 King County Courthouse
6 Seattle, Washington 98104

7 ANSWER TO INTERROGATORY NO. 34:

8 Nicholas' father, Brian, has repeatedly told Nicholas that her
9 mother is possessed by a demon and that it has been her fault
10 for their situation. Brian's explanation comes from church
11 teachings.

12 STATE OF WASHINGTON)
13 COUNTY OF KING) ss.

14 The undersigned being first duly sworn, on oath, deposes and
15 says:

16
17 That I have read the foregoing Supplemental Answers to
18 Interrogatories and Request for Production, know the contents
19 thereof, and believe the same to be true.

20
21 *Nicholas Chabot* Guardian for Nicholas
Nicholas Chabot

22 SUBSCRIBED AND SWORN to before me this 31st day of August,
23 1987.

24
25 *Jamera Sue Morrison*
Notary Public in and for the State
26 of Washington; My Commission
Expires: May 31, 1991

27 SUPPLEMENTAL ANSWERS TO INTERROGATORIES
- NICHOLAS CHABOT
28 chabnilb/dl/clh - Page 3

1 FILED

2 1987 SEP -1 AM 11:54

3 KING COUNTY
4 SUPERIOR COURT CLERK
5 SEATTLE, WA

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

8 SANDY EHRLICH and MICHAEL)
9 EHRLICH, husband and wife)
10 et al,)

11 Plaintiffs,)

12 v.)

13 RALPH ALSKOG and ROSEMARY)
14 ALSKOG, husband and wife,)
15 et al,)

16 Defendants.)

NO. 86-2-18429-5

SUPPLMENTAL ANSWERS
TO INTERROGATORIES
AND REQUEST FOR
PRODUCTION DIRECTED
TO PLAINTIFF MICHAEL
CHABOT

17 ANSWER TO INTERROGATORY NO. 8:

- 18 1. Marine View Hospital
- 19 (a.k.a. Pacific Medical Center)
- 20 1200 12th South
- 21 Seattle, Washington

22 Michael was in the emergency room approximately four to five
23 years ago for a broken nose.

- 24 2. Dr. Neil Duncanson
- 25 14212 Ambaum Blvd. SW
- 26 Seattle, Washington 98166

27 Dr. Duncanson is the family doctor, and Michael has seen him in
28 November or December of 1986, and approximately four months ago

SUPPLEMENTAL ANSWER TO INTERROGATORIES
- MICHAEL CHABOT
chabmilb/d1/clh - Page 1

34 WA
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ADLER, GIERSCH AND READ, P.S.
1621 SMITH TOWER
SEATTLE, WA 98104
(206) 682-4267

1
2 for routine check-up; a rash on his arm and feeling sick to his
3 stomach.

4 3. Dr. Menashe

5 22525 Marine View Drive S.

6 Des Moines, Washington

7 Dr. Menashe is the family dentist and Michael last saw him
8 approximately two to three years ago.

9 4. Dr. Hallow

10 Seattle Indian Health Board

11 1122 - 12th Ave. S.

12 Dr. Hallow delivered Michael and saw him approximately four
13 months ago for the eczema on his arms.

14 ANSWER TO INTERROGATORY NO. 9:

15 Suicidal thoughts, depression, anxiety, hurt, rejection, anger,
16 destruction of parent-child relationship, loss of
17 consortium/love/guidance/support from my parents; severe
18 emotional distress.

19 ANSWER TO INTERROGATORY NO. 14:

20 Counseling costs with Dr. Reed Davis in the amount of \$620.00
21 through July, 1987. Future counseling required according to Dr.
22 Davis.

23 ANSWER TO INTERROGATORY NO. 16:

24 Other than the injuries listed in supplemental interrogatory
25 number 9, I have had no new major subsequent sicknesses,
26 injuries or diseases.

27 SUPPLEMENTAL ANSWER TO INTERROGATORIES

28 - MICHAEL CHABOT

chabmilb/d1/clh - Page 2

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ADLER, GIERSCH AND READ, P.S.
1621 SMITH TOWER
SEATTLE, WA 98104
(206) 682-4267

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ANSWER TO INTERROGATORY NO. 17:

No new major subsequent injuries.

ANSWER TO INTERROGATORY NO. 23:

1. Mark Unger (oral)
King County Courthouse
W321 King County Courthouse
Seattle, Washington 98104
2. Reed Davis, Ph.D (oral)
12844 Military Road South
Seattle, Washington 98168

ANSWER TO INTERROGATORY NO. 34:

Brian, the father, has continually told Michael that his mother has demons and that she is responsible for the situation. He has stated this in front of the other children. It has happened on several occasions when the father has had visitation with the children.

STATE OF WASHINGTON)
) ss.
COUNTY OF KING)

The undersigned, being first duly sworn, on oath, deposes and says:

SUPPLEMENTAL ANSWER TO INTERROGATORIES
- MICHAEL CHABOT
chabmilb/dl/clh - Page 3

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That I have read the foregoing Supplemental Answers to Interrogatories and Request for Production, know the contents thereof, and believe the same to be true.

See Chabot Guardian for
Michael Chabot *Michael Chabot*

SUBSCRIBED AND SWORN to before me this 31st day of August, 1987.

Jamora Sue Morrison
Notary Public in and for the State of Washington; My commission expires: May 21, 1991

RECEIVED

SEP 15 1987 and For the County of KING

SEP 15 1987

SANDY EHRLICH and MICHAEL EHRLICH, et al.,

SEP 16 11:12:13

MOREN, LAGESCHULTE & CORNELL, P.S.

No. 86-2-18429-5

Plaintiff

NOTICE OF ORAL EXAMINATION BEFORE TRIAL

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

Defendant YAMAGUCHI & ASSOC.

DATE 9/16

ORIGINAL

To: All Parties of Record

and to: Their Respective Counsel

YOU, AND EACH OF YOU, WILL PLEASE TAKE NOTICE that the testimony of MICHAEL EHRLICH, the plaintiff above named will be taken on Oral Examination Before Trial at the instance and request of the defendants in the above entitled and numbered action, before Ernest H. Yamaguchi, Notary Public, or some other Notary Public at 1211 Smith Tower Seattle, Washington, on Friday, the 25th day of September 1987, commencing at the hour of 9:30 o'clock, A.M., on that day; the said Oral Examination of said witness at said time and place to be subject to continuance or adjournment from time to time or place to place until completed.

This testimony upon oral examination will be taken on the ground and for the reason the said person is a party to or a witness in the above entitled action, and will give evidence material to the establishment of the defendants' case.

DATED this 10th day of September, 1987.

Michael Bond

MICHAEL J. BOND

Attorneys for Defendants

Office and Post Office Address:

800 Washington Building Seattle, Washington.

624-7990

YAMAGUCHI & ASSOCIATES Court Reporters 408 Central Building Seattle, WA 98104 206-622-6875

35 Handwritten mark

In the Superior Court of the State of Washington,

In and For the County of KING

RECEIVED
SEP 15 1987

RECEIVED
SEP 15 1987

SANDY EHRLICH and MICHAEL EHRLICH,
et al.,
TOLER, GHERSCH, & P.

SEP 16 11:12:18

No. 86-2-18429-~~5~~ AGESCHULTE & CORNELL, MOREN,

Plaintiff vs. NOTICE OF ORAL EXAMINATION

YAMAGUCHI & ASSOC. BEFORE TRIAL

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

Defendant
DATE

YAMAGUCHI & ASSOC.
CORP. RECEIVED
9/16

ORIGINAL

To: All Parties of Record

and to: Their Respective Counsel

YOU, AND EACH OF YOU, WILL PLEASE TAKE NOTICE that the testimony of
SANDY EHRLICH, the plaintiff above named will be
taken on Oral Examination Before Trial at the instance and request of the defendants in the
above entitled and numbered action, before Ernest H. Yamaguchi, Notary Public, or some other
Notary Public at 1211 Smith Tower
Seattle, Washington, on Friday, the 25th day of September
1987, commencing at the hour of 1:00 o'clock, P.M., on that day; the said Oral Examination
of said witness at said time and place to be subject to continuance or adjournment from time to time
or place to place until completed.

This testimony upon oral examination will be taken on the ground and for the reason the said person
is a party to or a witness in the above entitled action, and will give evidence material to the establishment
of the defendants' case.

DATED this 10th day of September, 1987.

Michael Bond
MICHAEL J. BOND
Attorneys for Defendants

Office and Post Office Address:

800 Washington Building
Seattle, Washington.

624-7990

YAMAGUCHI & ASSOCIATES
Court Reporters
408 Central Building
Seattle, WA 98104
206-622-6875

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

SANDY EHRLICH and MICHAEL
EHRLICH, wife and husband;
LARRY LEMKE, parent; LARRY
LEMKE, Guardian ad Litem on
behalf of SYBIL N. LEMKE, a
minor; KATHRYN REYNOLDS; DEE
CHABOT, parent; DEE CHABOT,
Guardian ad Litem on behalf
of SHAWNA MICHELLE CHABOT,
MICHAEL GRANT CHABOT, NICHOLAS
STERLING CHABOT, minors,

Plaintiffs,

v.

RALPH ALSKOG and ROSEMARY
ALSKOG, husband and wife;
ROBERT HOWERTON and JANE DOE
HOWERTON, husband and wife;
E. SCOTT HARTLEY and JANE DOE
HARTLEY; DONALD LEE BARNETT
and BARBARA BARNETT, husband
and wife; COMMUNITY CHAPEL
AND BIBLE TRAINING CENTER,
a Washington corporation;
"JOHN DOES" 1-4 and "JANE
DOES" 1-4, husbands and wives;
FIRST DOE CORPORATION; and
FIRST DOE PARTNERSHIP,

Defendants.

NO. 86-2-18429-5

INTERROGATORIES AND REQUEST
FOR PRODUCTION DIRECTED TO
PLAINTIFF

TO: MICHAEL EHRLICH, Plaintiff; and
TO: RICHARD H. ADLER, his attorney

LEE, SMART, COOK, MARTIN & PATTERSON, P.S., INC.
ATTORNEYS AT LAW
800 WASHINGTON BUILDING
1925 FOURTH AVENUE
SEATTLE, WASHINGTON 98101
(206) 624-7990

36
JH

1 Pursuant to Rule 33 and 34, Civil Rules for Superior Court,
2 you are requested to supply answers to interrogatories and request
3 for production on the following pages. As required by CR 33 and 34,
4 please enter full and complete answers to each and every part in the
5 blank space provided, inserting additional pages where necessary;
6 verify your answers on the form provided after the last interroga-
7 tory; and serve a complete set of the interrogatories, answers and
8 attachments on the undersigned and file the original with the Clerk
9 of the Court within twenty (20) days of receipt hereof.

10 These interrogatories are continuing and require supple-
11 mental answers upon discovery of additional pertinent information
12 [CR 26(e)].

13 DATED this 29 day of October, 1986.

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

16 By Michael J. Bond
17 Michael J. Bond
Of Attorneys for Defendants

- 18 1. (a) State your full name and address.
19 (b) Have you ever gone under any other name or
20 different spelling of said name? If so, what
21 name or different spelling?
22 (c) State the date and place of your birth.
23 (d) State your Social Security number.

24 ANSWER:

25 Michael Steven Ehrlich, 29603-18th Ave.S., Federal Way, WA.
b) Mike
c) November 13, 1951, Grand Island, Nebraska
d) 501-62-5853

INTERROGS & REQ FOR
PRODUCTION TO PLTF - 2

LEE, SMART, COOK, MARTIN & PATTERSON, P.S. INC.
ATTORNEYS AT LAW
800 WASHINGTON BUILDING
1325 FOURTH AVENUE
SEATTLE, WASHINGTON 98101
(206) 624-7890

1 2. If you have lived in any other part of the United
2 States, name all such other places and dates.

3 ANSWER:

3 Scotts Bluff, Nebraska 1953-1954 San Diego, CA. 1963-1970
4 Grand Rapids, MN. 1955-1956 San Francisco, CA. 1971-1972
4 St. Cloud, MN. 1956-1963 Stanford, Montana 1972
5 Mandan, N. Dakota, 1963-1970 Kalispell, Montana 1973-1974
5 Seattle, WA. 1974-present

6 3. List the addresses, with the dates, where you resided
6 during the past ten years.

7 ANSWER: 1977-1982 325 S. 185th, Seattle, WA.
8 1982-present 29603-18th Ave. S., Federal Way, WA. 98003
9
10

11 4. State the month and year you last attended any school,
12 the highest grade or year completed, and the name and
12 location of each such school.

13 ANSWER: 1986- CCBTC, Post-graduate studies in Theology
14
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18 5. If you are married, please state your spouse's name and
18 the date and place of your marriage. If you have been
19 married more than once, state the names and addresses of
19 previous spouses, if living, and the date and place of
20 their death or your divorce.

21 ANSWER: Sandra Rae Ehrlich
21 October 9, 1976
22 CCBTC- 18635-8th Ave.S., Seattle, WA.
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25 6. State the names, addresses, and ages of your children,
if any.

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ANSWER: Evie Lynn - age 6
Allison Joy - age 5 months

7. List all injuries caused by any accident during your lifetime, stating the place, date and nature.

ANSWER:

Objection; vague, ambiguous and burdensome. Definition of "injury" and "accident" needed to correctly complete interrogatory. Without waiving this objection, regarding serious accidents, I was knocked unconscious during a soccer game in elementary school in St. Cloud, Minnesota in 1961, and spent about three days in the hospital with a concussion.

8. Have you ever been hospitalized. If so, list the approximate dates, the reasons for the hospitalization, and the name and address of the hospital.

ANSWER: In addition to my answer to Interrogatory No. 7, 1953-1954, Polio, West Nebraska Hospital, Scotts Bluff, Nebraska

1 9. List any and all sicknesses or diseases suffered during
2 your lifetime, the approximate dates thereof and periods
3 of disability (omit minor childhood diseases and illnesses).

4 ANSWER:

5 **Objection;** vague and ambiguous. Definition of "sickness"
6 and "disease" needed to correctly complete interrogatory. Without
7 waiving this objection regarding serious illnesses, I suffered from
8 Polio in 1953-1954.
9

10 10. List the names and addresses of all doctors, psychia-
11 trists, psychologists, osteopaths, chiropractors or
12 healers who have treated you the last ten years pre-
13 ceding the accident, the reason for the treatment, the
14 nature of the treatment, and the approximate dates
15 thereof.

16 ANSWER:

17 **Objection;** Vague and ambiguous. Definition of " the
18 accident" needed to correctly answer this interrogatory. Without
19 waiving this objection, I say Rodney Laviolette, M.D. for backpain,
20 and he prescribed muscle relaxants in 1979.
21

22 11. Set forth exactly what injuries you claim you received
23 as a result of this incident.

24 ANSWER:

25 **Objection;** vague and ambiguous. Definition of "this
incident" needed to correctly complete interrogatory answer. Without
waiving this objection, please see Plaintiffs complaint for personal
injuries and damages.

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5 12. List the names and addresses of all doctors and/or
6 physical therapists who have treated you from the time
7 of the occurrence alleged in your Complaint, to date.

8 ANSWER: Objection; vague and ambiguous. Definition of "occurrence"
9 needed to answer tjos interrogatory. Without waiving this objection,
10 I have seen Thomas Hulse, M.D., 15211-8th Ave. S., Seattle, Wa.

11
12
13 13. List the dates of treatment and/or examination by the
14 doctors and/or physical therapists referred to by you in
15 response to Interrogatory No. 12.

16 ANSWER: Thomas Hulse, M.D.- August 7, 1986
17
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20 14. State the nature of the treatment by those doctors
21 and/or physical therapists listed by you in response to
22 Interrogatory No. 12.

23 ANSWER: I consulted Dr. Hulse re: insomnia. He prescribed sleep-
24 ing pills.
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15. Were you hospitalized as a result of your claimed injuries? If so, state the dates of hospitalization and where hospitalized.

ANSWER: No.

16. Give an itemization of all hospital and medical expenses incurred by you which you attribute to the incident alleged in your Complaint.

ANSWER: **Objection;** vague and ambiguous. Definition of "the incident" needed to correctly answer this interrogatory. Without waiving this objection, Thomas Hulse, M.D., Aug. 7, 1986, \$35.00. This interrogatory answer will be supplemented as more information becomes available.

17. List any other out-of-pocket expenses not heretofore mentioned that you may claim as a result of this incident.

ANSWER: **Objection;** vague and ambiguous. definition of "this incident" needed to answer this interrogatory. Without waiving this objection, I lost my job. Also, due to the fact that I was not eligible for unemployment due to my ministerial status at CCBTC, our family had to live off of and eventually depleted our savings of \$5000.00. I also spent \$500.00 to return to Minnesota to recuperate from the emotional and physical strain resulting from the events described in Plaintiffs complaint for Personal injury and damages.

1 18. If you have engaged any person or persons to do any
2 work, at home or otherwise, that you are alleging would
3 not have been necessary if it were not for the occur-
4 rence and injuries alleged in your Complaint, state the
5 name and address of each such person or persons, the
6 period of each such employment, the general nature of
7 the duties of each such person in each such employment,
8 and the compensation paid to each such person by the
9 plaintiff for such service.

10
11
12 ANSWER: Objection; vague and ambiguous. Definition of " the
13 occurrence" needed to answer interrogatory. Without waiving this ob-
14 jection, the answer is N/A.

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21 19. List any sickness, injury or disease suffered since the
22 time of the accident, giving names and addresses of any
23 and all physicians who have treated you therefore, and
24 the dates of hospitalization, if any.

25
ANSWER: Objection; vague and ambiguous. Definition of the
"accident" needed to correctly answer interrogatory. Without waiving
this objection, I have suffered from severe psychological trauma and
emotional strain due to the various incidents listed in Plaintiff's
Complaint for Personal Injury and Damages.

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20. If you have been injured since the time of the incident,
set forth the specific details thereof as to how, when,
where, and the names and addresses of any other parties
known to you who were involved in this accident.

ANSWER: See answer to Interrogatory No. 19 above.

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21. If, since the date of the incident alleged in your Complaint, you have had occasion to make use of any medication, state, if known, the nature of each such medication, the doctor prescribing same, the period during which each such medication was taken, and the approximate amount of money expended to date for the purchase of each such medication so listed.

ANSWER:

See answer to Interrogatory numbers 12-14.

22. State the names and addresses of all of your employers and the nature of your employment over the past ten years, indicating the approximate dates involved.

ANSWER:

July 1, 1986- to present- Custodian for Kent School District #415, Kent, WA.
September 1978- May 1986- teacher, CCBTC, Seattle, WA.
October, 1975 to may 1979- janitor, American Building, Seattle, WA.

1 23. If, during any of the periods of employment mentioned
2 above, you lost time from work due to illness or acci-
dent, list the date, time lost, and the reason therefor.

3 ANSWER:

4 **Objection;** overbroad, burdensome, and irrelevant. Without
5 waiving this objection, I do not have a clear recollection of dates.
6 My employer probably has those records.

7
8
9 24. Were you working at the time of this incident? If so,
10 state the name, address, and telephone of your employer,
11 your job title, the nature of your employment, and
approximately how many hours you worked per week.

12 ANSWER: **Objection;** vague and ambiguous. Without waiving this
13 objection, yes, I was working as a minister/teacher at CCBTC, Seattle,
14 WA..My work included developing the Bible curriculim CCBTC used in
preparing students for the ministry, lecturing, research and counseling.
On the average, I worked 55 hours per week. In the summertime I worked
for CCBTC as a groundskeeper.

15
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17
18 25. What was your rate of pay during the time which is a
19 subject of this lawsuit?

20 ANSWER: Approximatly \$2,500.00 a month.

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23
24 26. How much time did you lose from work as a result of the
25 events alleged in your complaint.

1 ANSWER: I was disfellowshipped and therefore my employment was
2 terminated. Also, see answer to Interrogatory to No. 27.

3
4 27. What is your total loss of wages, or income, if any, to
5 date, as a result of this incident?

6 ANSWER: **Objection;** vague and ambiguous. Definition of "incident"
7 needed to correctly answer this interrogatory. Without waiving this
8 objection, approximately \$4,500.00 due to desfellowship from CCBTC
9 and subsequent unemployment .

10 28. If you have been self-employed, state for each period of
11 self-employment the net monthly earnings.

12 ANSWER: N/A

13 29. Have you ever previously made a claim for an injury or
14 been involved in a lawsuit? If so, state the nature of
15 the action, the court or tribunal in which it was filed,
16 the cause number, disposition of the case, and the name,
17 address and telephone number of the attorney who repre-
18 sented you.

19 ANSWER: No

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21
22 30. Have you ever made a claim for injuries which did not
23 result in a lawsuit? If so, identify each by stating
24 when, where, the nature of the action, the disposition
25 of the case, and the name, address and telephone number
of the attorney who represented you.

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ANSWER:

No.

31. Have you ever been convicted of a crime? If so, please state for each such crime the statutory provision violated, the court in which the case was heard, the type of disposition of the case, the cause number, and the name, address and telephone of the attorney who represented you.

ANSWER:

No.

32. Furnish the names, addresses, occupations, job designations and present location of any person known to you or your attorneys, as having knowledge of relevant facts pertaining to the above-entitled cause. This request is intended to include all witnesses known to you or your attorneys.

ANSWER:

Objection; vague and overbroad. Please define term "relevant" and ask more specific questions. Without waiving this objection, the requested information is being acquired and compiled pursuant to discovery process. Although the interrogatory cannot be completed at this early stage of discovery, as discovery proceeds, information will be supplied and continuously supplemented.

1 33. Have you given any written or oral statements to anyone
2 concerning the accident? If so, state the name and
3 address of the person or persons who took each such
statement or statements.

4 ANSWER:

4 David Wilkerson- written
5 Dr. Ron Enroth- taped statement
5 Pastor Floyd- oral
6 Marvin Williams- oral
6 Mike and Maureen Sabourin- oral
7 David and Nancy Dobbs- oral

8 34. Do you have any photographs of any activity involving
9 the Community Chapel and Bible Training Center?

9 ANSWER:

10 No

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16 35. Describe your present physical condition with regard to
17 any residual pain or disability which you believe is
18 related to the injuries you received.

18 ANSWER:

19 See Complaint for Personal Injuries and Damages
20
21
22

23 36. State what your doctors have advised you regarding the
24 necessity of further medical treatment for the injuries
25 you received.

1 ANSWER: To be supplied as information becomes available.
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6 37. State what your doctors have advised you regarding the
7 possibility of permanent residual injury.

8 ANSWER: See answer to Interrogatory No. 36.
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14 38. If you have applied for Unemployment Compensation since
15 the incident described in your Complaint, state the date
 of such application.

16 ANSWER: **Objection;** vague and ambiguous. Definition of "the
17 incident" needed to correctly answer interrogatory. Without waiving
18 this objection I inquired about unemployment and compensation but did
19 not apply because of my ministerial status.
20
21

22 39. Had you had anything of an alcoholic nature to drink
23 within 5 years before the events alleged in your
24 complaint? If so, state what you had to drink, the
25 amount thereof, when and where you consumed such
 alcoholic beverage.

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ANSWER:

Objection; This interrogatory exceeds the permissible bounds of discovery and is designed to harass rather than lead to the discovery of admissible evidence. Notwithstanding objection, no.

40. Identify each person whom you expect to call as an expert witness at trial, and as to each such person, please state the following:

- (a) Name;
- (b) Address;
- (c) Telephone number;
- (d) Occupation;
- (e) Job classification;
- (f) Name of employer;
- (g) Brief resume of professional and/or educational history and qualifications.

ANSWER:

To be provided at later date.

41. Please state the subject matter on which each expert you have listed in answer to the preceding interrogatory is expected to testify.

1 ANSWER: See answer to interrogatory No. 40.
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6 42. State the substance of the facts and opinions to which
7 each expert in answer to Interrogatory No. 42 is
8 expected to testify.

9 ANSWER: See answer to interrogatory No. 40.
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14 43. Please state a summary of the grounds for such opinion
15 to which the experts identified in answer to Interroga-
16 tory No. 42 are expected to testify.

17 ANSWER: See answer to interrogatory No. 40.
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22 44. With respect to your allegation in paragraph 12.8 of
23 the complaint that "defendants have made disparaging and
24 false statements in public regarding plaintiffs to
25 members of the congregation", please state in detail the
 contents of each such statement, the identity of the
 speaker, all members of the public who heard the alleged
 statement, the date each statement was made, and the
 location where each such statement was made.

1 ANSWER: In May 1986, Don Barnett made several negative state-
2 ments about me to various members of CCBTC. He told them that I was in
3 a bad way with the church and I was not attending services. He asked
4 them not to question me or to speak to me. When my wife and I were
5 disfellowshipped from CCBTC, our names were printed in the church
6 bulletin and the congregation was asked not to talk or visit with us.
7 Under the disfellowshipped notice were printed bible verses. These
8 verses did not pertain to us and were libelous to our character.

9 45. Please identify the name, address and dates of atten-
10 dance of every church you attended any type of service,
11 whether it be worship service, counseling, education or
12 social meeting since January 1, 1975.

13 ANSWER: CCBTC, Seattle, WA. 1974-1986.
14 La Prairie Church of God, LaPrairie, MN. Dec. 1985
15 Cornerstone Christian Center, Lacey, WA. May - July 1986
16 Des Moines Assembly of God, Des Moines, WA. June-Aug. 1986
17 N.W. Church, Federal Way, WA. Aug. 1986- present
18 Puyallup First Assembly, Puyallup, WA. Feb. 1987-present

19 REQUEST FOR PRODUCTION NO. 1: Produce true and correct
20 copies of all of your income tax returns for the past
21 ten years.

22 Objection: Burdensome and irrelevant. Without waiving this objection,
23 RESPONSE: please see attached. The missing income tax
24 returns have been ordered and they will be supplemented to you as soon
25 as they arrive.

26 ANSWERS and RESPONSES to the foregoing INTERROGATORIES and
27 REQUEST FOR PRODUCTION submitted this _____ day of _____,
28 19__.

29 _____
30 RICHARD H. ADLER
31 Of Attorneys for Plaintiffs

32 INTERROGS & REQ FOR
33 PRODUCTION TO PLTF - 17

34 LEE, SMART, COOK, MARTIN & PATTERSON, P.S., INC.
35 ATTORNEYS AT LAW
36 800 WASHINGTON BUILDING
37 1325 FOURTH AVENUE
38 SEATTLE, WASHINGTON 98101
39 (206) 624-7990

1 STATE OF WASHINGTON)
2 COUNTY OF) ss.

3 The undersigned (parties to the above-entitled action, or
4 persons authorized to respond on behalf of said parties), being
5 first duly sworn, on oath, depose and say:

6 That they have read the foregoing Interrogatories, Request
7 for Production and the Answers thereto, know the contents thereof,
8 and believe the same to be true.

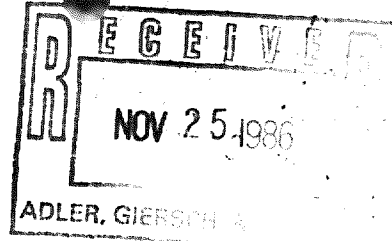
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10 WDL EURLPZ4A6D1 x Jandra Rae Ehrlich
11
12 WDL EHELIMS491QL x Michael Steven Ehrlich

13
14 SUBSCRIBED AND SWORN to before me this 30th day of
15 April, 1987.

16
17 [Signature]
18 Notary Public in and for the State of
19 Washington; My commission expires:
20 FEB 21 1991

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INTERROGS & REQ FOR
PRODUCTION TO PLTF - 18
(DOCINT #1/25 [JPD 7A/16] - 10/25/86)

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800 WASHINGTON BUILDING
1325 FOURTH AVENUE
SEATTLE, WASHINGTON 98101
(206) 624-7990



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

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SANDY EHRLICH and MICHAEL)
EHRLICH, wife and husband;)
LARRY LEMKE, guardian ad litem)
on behalf of SYBIL N. LEMKE, a)
minor; KATHRYN REYNOLDS; DEE)
CHABOT, parent; DEE CHABOT,)
guardian ad litem on behalf of)
SHAWNA MICHELLE CHABOT, MICHAEL)
GRANT CHABOT, NICHOLAS STERLING)
CHABOT, minors,)

Plaintiffs,)

vs.)

RALPH ALSKOG and ROSEMARY)
ALSKOG, husband and wife;)
ROBERT HOWERTON and JANE DOE)
HOWERTON, husband and wife;)
E. SCOTT HARTLEY and JANE DOE)
HARTLEY; DONALD LEE BARNETT and)
BARBARA BARNETT, husband and)
wife; COMMUNITY CHAPEL AND BIBLE)
TRAINING CENTER, a Washington)
corporation; "JOHN DOES" 1-4 and)
"JANE DOES" 1-4, husbands and)
wives; FIRST DOE CORPORATION; and)
FIRST DOE PARTNERSHIP,)

Defendants.)

NO. 86-2-18429-5

INTERROGATORIES AND REQUEST
FOR PRODUCTION DIRECTED TO
PLAINTIFF

TO: SANDY EHRLICH, Plaintiff; and

TO: RICHARD H. ADLER, Attorney for Plaintiff

Pursuant to Rule 33 and 34, Civil Rules for Superior Court,
you are requested to supply answers to interrogatories and request

LEE, SMART, COOK, MARTIN & PATTERSON, P.S., INC.
ATTORNEYS AT LAW
800 WASHINGTON BUILDING
1325 FOURTH AVENUE
SEATTLE, WASHINGTON 98101
(206) 624-7990

INTERROGS & REQ FOR
PRODUCTION TO PLTF - 1

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9H

1 for production on the following pages. As required by CR 33 and 34,
2 please enter full and complete answers to each and every part in the
3 blank space provided, inserting additional pages where necessary;
4 verify your answers on the form provided after the last interroga-
5 tory; and serve a complete set of the interrogatories, answers and
6 attachments on the undersigned and file the original with the Clerk
7 of the Court within twenty (20) days of receipt hereof.

8 These interrogatories are continuing and require supple-
9 mental answers upon discovery of additional pertinent information
10 [CR 26(e)].

11 DATED this 29 day of October, 1986.

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

14 By Michael J. Bond
15 Michael J. Bond
16 Of Attorneys for Defendants

- 17 1. (a) State your full name and address.
18 (b) Have you ever gone under any other name or
19 different spelling of said name? If so, what
20 name or different spelling?
21 (c) State the date and place of your birth.
22 (d) State your Social Security number.

23 ANSWER:

- 23 a) Sandra Rae Ehrlich, 29603- 18th S. Federal Way, WA.
24 b) Sandy Rae Berger
24 c) March 21, 1956, Bismark, N. Dakota
24 d) 502-82-3918

1 2. If you have lived in any other part of the United
2 States, name all such other places and dates.

3 ANSWER: 1956-1974 Mandan, North Dakota
4

5
6 3. List the addresses, with the dates, where you resided
7 during the past ten years.

8 ANSWER:
9 1977-1982- 325 S. 185th, Seattle, WA.
10 1982-present, 29603-18th S., Federal Way, WA.

11 4. State the month and year you last attended any school,
12 the highest grade or year completed, and the name and
13 location of each such school.

14 ANSWER:
15 CCBTC, December 1985, Bachelor of Theology
16

17
18 5. If you are married, please state your spouse's name and
19 the date and place of your marriage. If you have been
20 married more than once, state the names and addresses of
21 previous spouses, if living, and the date and place of
22 their death or your divorce.

23 ANSWER: Michael Steven Ehrlich, October 9, 1976, Seattle, WA.
24

25 6. State the names, addresses, and ages of your children,
if any.

1 ANSWER:

2 Evie Lynn- age 6 years
3 Allison Joy- age 5 months

4 Residing with parents at 29603-18th Ave. S., Federal Way, WA.
5

6 7. List all injuries caused by any accident during your
7 lifetime, stating the place, date and nature.

8 ANSWER: No serious accidents
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14 8. Have you ever been hospitalized. If so, list the
15 approximate dates, the reasons for the hospitalization,
16 and the name and address of the hospital.

17 ANSWER: January 13, 1981- Birth if Evie, Riverton Hospital,
18 12844 Military Rd. S., Seattle,WA.

19 October 24, 1986- Birth of Allison, Riverton Hospital
20 12844 Military Rd S., Seattle,WA.
21
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1 9. List any and all sicknesses or diseases suffered during
2 your lifetime, the approximate dates thereof and periods
3 of disability (omit minor childhood diseases and illnesses).

4 ANSWER: **Objection;** vague, ambiguous, burdensome, and irrelevant.
5 Without waiving this objection, I suffered from various allergies
6 between 1969 - 1974.

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11 10. List the names and addresses of all doctors, psychia-
12 trists, psychologists, osteopaths, chiropractors or
13 healers who have treated you the last ten years pre-
ceding the accident, the reason for the treatment, the
nature of the treatment, and the approximate dates
thereof.

14 ANSWER: **Objection;** vague and ambiguous. Definition of "the
15 accident" needed to correctly complete interrogatory. I saw Frank
16 Fullington, M.D. throughout my pregnancy and birth of my daughter
Ivie.

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22 11. Set forth exactly what injuries you claim you received
23 as a result of this incident.

24 ANSWER: **Objection;** vague and ambiguous. Definition of "this
25 incident" needed to correctly answer this interrogatory. Without
waiving this objection, please see Plaintiffs complaint for Personal
Injuries and Damages.

INTERROGS & REQ FOR
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(206) 624-7990

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12. List the names and addresses of all doctors and/or physical therapists who have treated you from the time of the occurrence alleged in your Complaint, to date.

ANSWER: Objection; vague and ambiguous. Definition of "the occurrence" needed to correctly answer this interrogatory. Without waiving this objection, Jerry Yates, M.D. and William Barbour, M.D. at 2801 S. 128th St., Seattle, WA. and David Penner, Ph.D. 12844 Military Rd. S., Seattle, WA.

13. List the dates of treatment and/or examination by the doctors and/or physical therapists referred to by you in response to Interrogatory No. 12.

ANSWER: Dr. Penner; Dec. 8, 1986, Jan. 7, 1987, Feb. 4, 1987
Dr. Yates; throughout pregnancy of Allison
Dr. Barbour; on and around Oct. 24, 1986

14. State the nature of the treatment by those doctors and/or physical therapists listed by you in response to Interrogatory No. 12.

ANSWER: Dr. Yates, OB/GYN
Dr. Barbour, OB/GYN, delivered Allison
Dr. Penner, counseling

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15. Were you hospitalized as a result of your claimed injuries? If so, state the dates of hospitalization and where hospitalized.

ANSWER:

no

16. Give an itemization of all hospital and medical expenses incurred by you which you attribute to the incident alleged in your Complaint.

ANSWER:

Dr. Penner, Ph.D.

December 8, 1986	\$75.00
January 7, 1987	\$75.00
February 4, 1987	\$75.00

17. List any other out-of-pocket expenses not heretofore mentioned that you may claim as a result of this incident.

ANSWER: Objection; vague and ambiguous. Definition of "this incident" needed to answer this interrogatory. Without waiving this objection I paid \$500.00 for a round trip ticket back home to N. Dakota; Transportation costs; loss of income from my husbands termination at CCBTC; future counseling costs.

1 18. If you have engaged any person or persons to do any
2 work, at home or otherwise, that you are alleging would
3 not have been necessary if it were not for the occur-
4 rence and injuries alleged in your Complaint, state the
5 name and address of each such person or persons, the
6 period of each such employment, the general nature of
7 the duties of each such person in each such employment,
8 and the compensation paid to each such person by the
9 plaintiff for such service.

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12 ANSWER: Objection; vague and ambiguous. Definition of "engaged"
13 and "the occurance" needed to answer this interrogatory. Without
14 waiving this objection, My parents.

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21 19. List any sickness, injury or disease suffered since the
22 time of the accident, giving names and addresses of any
23 and all physicians who have treated you therefore, and
24 the dates of hospitalization, if any.

25 ANSWER: Objection; vague and ambiguous. Definition of "the
accident" needed to correctly answer this interrogatory. With-
out waiving this objection, I have not seen any physicians as a
result of injuries stated in my complaint.

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32 20. If you have been injured since the time of the incident,
33 set forth the specific details thereof as to how, when,
34 where, and the names and addresses of any other parties
35 known to you who were involved in this accident.

ANSWER: Objection; vague and ambiguous. Definition of "the
incident" needed to answer this interrogatory. Without waiving this
objection, please see Plaintiffs complaint for personal injuries and
damages.

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21. If, since the date of the incident alleged in your Complaint, you have had occasion to make use of any medication, state, if known, the nature of each such medication, the doctor prescribing same, the period during which each such medication was taken, and the approximate amount of money expended to date for the purchase of each such medication so listed.

ANSWER: Objection; vague and ambiguous. Definition of "the incident" needed to answer this interrogatory. Without waiving this objection, I have used over-the-counter sleeping pills, to help with insomnia.

22. State the names and addresses of all of your employers and the nature of your employment over the past ten years, indicating the approximate dates involved.

ANSWER: I have been a homemaker and mother for the last 10 years.

1 23. If, during any of the periods of employment mentioned
2 above, you lost time from work due to illness or acci-
dent, list the date, time lost, and the reason therefor.

3 ANSWER:

4 N/A

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9 24. Were you working at the time of this incident? If so,
10 state the name, address, and telephone of your employer,
11 your job title, the nature of your employment, and
approximately how many hours you worked per week.

12 ANSWER:

13 N/A

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18 25. What was your rate of pay during the time which is a
19 subject of this lawsuit?

20 ANSWER:

21 N/A

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24 26. How much time did you lose from work as a result of the
25 events alleged in your complaint.

INTERROGS & REQ FOR
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SEATTLE, WASHINGTON 98101
(206) 624-7880

1 ANSWER: N/A

2
3
4 27. What is your total loss of wages, or income, if any, to
5 date, as a result of this incident?

6 ANSWER: Objection; vague and ambiguous. Definition of "this
7 incident" needed to answer this interrogatory. Without waiving this
8 objection, we lost approximately \$4,000.00 in wage loss from my
9 husbands unemployment from CCBTC.

10 28. If you have been self-employed, state for each period of
11 self-employment the net monthly earnings.

12 ANSWER:

13 N.A

14 29. Have you ever previously made a claim for an injury or
15 been involved in a lawsuit? If so, state the nature of
16 the action, the court or tribunal in which it was filed,
17 the cause number, disposition of the case, and the name,
18 address and telephone number of the attorney who repre-
19 sented you.

20 ANSWER: No.

21
22 30. Have you ever made a claim for injuries which did not
23 result in a lawsuit? If so, identify each by stating
24 when, where, the nature of the action, the disposition
25 of the case, and the name, address and telephone number
 of the attorney who represented you.

1 ANSWER:

2 No

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7 31. Have you ever been convicted of a crime? If so, please
8 state for each such crime the statutory provision vio-
9 lated, the court in which the case was heard, the type
 of disposition of the case, the cause number, and the
 name, address and telephone of the attorney who repre-
 sented you.

10 ANSWER: No

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17 32. Furnish the names, addresses, occupations, job designa-
18 tions and present location of any person known to you or
19 your attorneys, as having knowledge of relevant facts
 pertaining to the above-entitled cause. This request is
 intended to include all witnesses known to you or your
 attorneys.

20 ANSWER: Objection, vague, ambiguous, and burdensome. Please
21 define relevnat facts and ask specific interrogatories. Without
22 waiving this objection, the information is being acquired and comp-
 iled pursuant to discovery process. Information will be supplemented.

1 33. Have you given any written or oral statements to anyone
2 concerning the accident? If so, state the name and
3 address of the person or persons who took each such
statement or statements.

4 ANSWER: Objection; vague and ambiguous. Definition needed of
5 "the accident" to answer this interrogatory. Without waiving this
6 objection, I have talked to people about matters contained in the
7 complaint, but can't recall specifics. Written statements were
8 provided to David Wilkerson in Texas; Ronald Enroth, taped; Seattle
9 Police Department; Pastor Steve Steffy in Federal Way.

10 34. Do you have any photographs of any activity involving
11 the Community Chapel and Bible Training Center?

12 ANSWER:

13 Yes

14 35. Describe your present physical condition with regard to
15 any residual pain or disability which you believe is
16 related to the injuries you received.

17 ANSWER:

18 Please see plaintiffs complaint for personal injuries
19 and damages.

20 36. State what your doctors have advised you regarding the
21 necessity of further medical treatment for the injuries
22 you received.

1 ANSWER: Dr. Yates advised indefinite professional counseling.
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6 37. State what your doctors have advised you regarding the
possibility of permanent residual injury.

7 ANSWER: At present the requested information is being acquired
8 and compiled pursuant to discovery process. As discovery continues
9 information will be supplemented.
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14 38. If you have applied for Unemployment Compensation since
the incident described in your Complaint, state the date
15 of such application.

16 ANSWER: NO.
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22 39. Had you had anything of an alcoholic nature to drink
23 within 5 years before the events alleged in your
complaint? If so, state what you had to drink, the
24 amount thereof, when and where you consumed such
alcoholic beverage.
25

1 ANSWER: Objection. This interrogatory exceeds the permissible
2 bounds of discovery and is designed to harass rather than lead to
3 the discovery of admissible evidence. Notwithstanding this objection
4 the answer is no.

5
6 40. Identify each person whom you expect to call as an
7 expert witness at trial, and as to each such person,
8 please state the following:

9 (a) Name;

10 (b) Address;

11 (c) Telephone number;

12 (d) Occupation;

13 (e) Job classification;

14 (f) Name of employer;

15 (g) Brief resume of professional and/or educa-
16 tional history and qualifications.

17 ANSWER:

18 To be made at a later date.

19
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23 41. Please state the subject matter on which each expert you
24 have listed in answer to the preceding interrogatory is
25 expected to testify.

1 ANSWER:

2 See answer to Interrogatory No. 40

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6 42. State the substance of the facts and opinions to which
7 each expert in answer to Interrogatory No. 42 is
8 expected to testify.

9 ANSWER:

10 See answer to Interrogatory No. 40, 41

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14 43. Please state a summary of the grounds for such opinion
15 to which the experts identified in answer to Interroga-
16 tory No. 42 are expected to testify.

17 ANSWER:

18 See answer to Interrogatory No. 40, 41, 42

19
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21 44. With respect to your allegation in paragraph 12.8 of
22 the complaint that "defendants have made disparaging and
23 false statements in public regarding plaintiffs to
24 members of the congregation", please state in detail the
25 contents of each such statement, the identity of the
 speaker, all members of the public who heard the alleged
 statement, the date each statement was made, and the
 location where each such statement was made.

1 ANSWER: In May, 1986, Donald Barnett of CCBTC made several
2 negative remarks about my husband; please see his answers to
3 Interrogatories. Our names were printed in the CCBTC Bulletin
4 together with certain selective Bible verses which did not apply
5 to us and were disparaging and false. Donald Barnett told the
6 CCBTC congregation not to speak or have fellowship with us.

7
8 45. Please identify the name, address and dates of atten-
9 dance of every church you attended any type of service,
10 whether it be worship service, counseling, education or
11 social meeting since January 1, 1975.

12 ANSWER: CCBTC- 8/74-3/86, Seattle, WA.
13 First United Methodist, North Dakota, 2/86
14 Colonial Bible Church, March 1986
15 Cornerstone Christian Center, May 1986-June 1986- Olympia, Wa.
16 Northwest Church- August 1986- December 1986, Federal Way, WA.
17 Des Moines Assembly of God- Weddings and special meetins, June-
18 August 1986

19
20 46. With respect to your allegation in paragraph 21.1 of the
21 complaint, please state the date of each sexual assault,
22 the location of each sexual assault, the persons present
23 at the time each sexual assault occurred and all persons
24 with knowledge of these alleged sexual assaults.

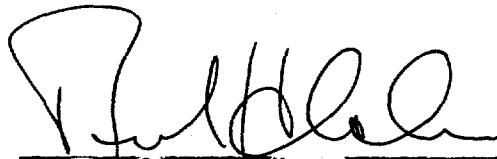
25 ANSWER: The sexual assaults referred to in my complaint occurred
from November 1985 to February 1986. The sexual assaults took place
at Ralph Alskog's CCBTC office, his home and at CCBTC's Educational
Building's storage room.

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REQUEST FOR PRODUCTION NO. 1: Produce true and correct copies of all of your income tax returns for the past ten years.

RESPONSE: Objection; Burdensome and irrelevant. Without waiving this objection, please see attached. The remainder of the tax forms requested have been ordered from the IRS and we will supplement them to you as soon as they are received by our office.

ANSWERS and RESPONSES to the foregoing INTERROGATORIES and REQUEST FOR PRODUCTION submitted this 8th day of MAY, 1987.



Richard Adler
Of Attorneys for Plaintiffs

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STATE OF WASHINGTON)
) ss.
COUNTY OF)

The undersigned (parties to the above-entitled action, or persons authorized to respond on behalf of said parties), being first duly sworn, on oath, depose and say:

That they have read the foregoing Interrogatories, Request for Production and the Answers thereto, know the contents thereof, and believe the same to be true.

WDL EHRLEISRAADI Jandra Rae Ehrlich

WDL EHRLEIMSA9100L WDL: Michael Steven Ehrlich

SUBSCRIBED AND SWORN to before me this 30th day of April, 1987.

[Signature]
Notary Public in and for the State of Washington; My commission expires: FEB 01 1991

7 AUG -4 1986

SEP 24 10 12: 07

SUPERIOR COURT CLERK

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

SANDY EHRLICH and MICHAEL EHRLICH,)
wife and husband; et al.,)

NO. 86-2-18429-5

Plaintiffs,)

v.)

REQUEST FOR PRODUCTION
PROPOUNDED TO PLAINTIFFS
SANDY EHRLICH AND MICHAEL
EHRLICH

RALPH ALSKOG and ROSEMARY ALSKOG,)
husband and wife; et al.,)

Defendants.)

TO: SANDY EHRLICH and MICHAEL EHRLICH, Plaintiffs

AND TO: RICHARD H. ADLER, their Attorney

Pursuant to Civil Rule 34, please take notice that defendants request that plaintiffs Sandy and Michael Ehrlich produce for examination and inspection, within twenty (20) days after receipt of this request at the offices of said plaintiffs' attorneys, the following items:

REQUEST FOR PRODUCTION NO. 1:

All documents in your possession containing any evidence which relates in any way to the claims asserted in your Complaint for personal Injuries and Damages dated July 31, 1986, including all church bulletins or other written record reflecting the alleged disparaging and false statements made about plaintiffs and all photographs of any activity at the defendant chapel.

REQ/PRODUCTION - 1

LEE, SMART, COOK, MARTIN & PATTERSON, P.S., INC.
ATTORNEYS AT LAW
800 WASHINGTON BUILDING
1325 FOURTH AVENUE
SEATTLE, WASHINGTON 98101
(206) 624-7990

38
JK

1 RESPONSE:

2
3
4
5 DATED this 2 day of June, 1987.

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

8 By Michael J. Bond
9 MICHAEL J. BOND
of Attorneys for Defendants

10 RESPONSES to the foregoing REQUEST FOR PRODUCTION
11 submitted this 31st day of July, 1987.

12 ADLER, GIERSCH & READ

13 By Richard H. Adler
14 RICHARD H. ADLER
15 Attorney for Plaintiffs

Community Chapel and Bible Training Center

Pastor Donald Barnett
Sunday, May 11, 1986

Office Phone
431-3100

Ushers' Phone
431-3160

SUNDAY

East Campus Sunday School Classes
West Campus Sunday School Classes
Adult Bible Class
Morning Worship
Evening Worship

9:30 A.M.
9:45
10:00
11:00
7:00 P.M.

TUESDAY

Worship Meeting *(no visitors, please)*—Sanctuary
Deliverance Prayer Meeting—rooms S-113 & S-119

7:00 P.M.
7:00

THURSDAY

Worship Meeting *(no visitors, please)*—Sanctuary

7:00 P.M.

FRIDAY

Worship Service

7:45 P.M.

DELIVERANCE PRAYER for married couples with spiritual connections will be held 7-8 P.M. in the Sanctuary on Thursdays. We encourage everyone in this category to attend; however, because these sessions will continue for a number of weeks, you do not need to cancel other engagements in order to come. Those who wish to pray for the move of God may use the upper and lower prayer areas behind the pulpit.

PARENTS OF CHRISTIAN SCHOOL ELEMENTARY STUDENTS: Our annual Parent-Teacher-Student Fellowship, originally scheduled for Mon., May 19, has been moved to Mon., June 2, 7:30 P.M., in the Sanctuary. You are warmly invited.

SUMMER CHILD CARE: The Nursery/Preschool will offer classes this summer for your children, ages 6 months through 5 years. Classes will run 9 A.M.-1 P.M., Mon.-Fri., beginning May 19. The cost is \$2/hour for one child, \$1/hour for each additional child per family.

Nursery/Preschool will be open for both advanced reservations and drop-ins (space permitting). To ensure room in class for your children, we encourage you to register them in C-206 during the first week of class.

This program can be a nice change of pace for you and your children, providing social interaction for your children, and providing time for you to shop, worship the Lord, or take summer Bible College classes. Preschool curriculum includes teaching basic colors and shapes, introduction to the alphabet and the world around us, and outdoor activities. If you have questions, call Mary Jane Fishler (431-3137, mornings; 243-4826, evenings).

REMEMBER TO PRAY FOR OUR PASTOR!

A NOTE TO OUR YOUNG PEOPLE: We love to see you wholeheartedly worshipping the Lord in the dance! We need to remind you, however, that because of limited space you may only use the middle aisle of the sanctuary, or the gym (if approved). The front area of the sanctuary is reserved for adults.

NEW IN THE BOOKSTORE AND ON THE BOOKCOUNTERS:

- *The First Million Years/You're Altogether Pleasant to Be With/Loving You Is What I Do*, by Linda Hamill & Joe Schley.
- *You Lift Me Up/I Belong to You/No Longer I*, by Linda Hamill & Joe Schley.
- *The Manchild-Bride Company/On the Glory Road*, by Dan Heath.

All three tapes were recorded in our studio; price: \$4.50 each (includes \$.33 sales tax).

"COME AND HEAR, ALL YE THAT FEAR GOD, and I will declare what he hath done for my soul" (Psa. 66:16). Is God doing great things in your life? Share them and inspire faith in the people around you. A person who is going through trials can really be encouraged when he hears someone say, "God is doing great things for me! He is pouring His love on me! He is giving me victory over sin and showing me new places in His Spirit!" This kind of confession magnifies the love and mercy of God. Don't let the devil punch holes in your faith with negative thoughts and words! God is good, and He is on your side. It is His plan to "supply all your need according to his riches in glory by Christ Jesus" (Php. 4:19).

LADIES: Please remember that you are required to wear some sort of shoes while dancing. It not only looks better, but it is also safer for your feet. Exceptions are permitted, of course, if you don't have shoes one evening; however, we don't want this to become a practice. Thank you for your cooperation.

IMMEDIATE JOB OPENING: The College Administration office is seeking a full-time receptionist. Minimum requirements include typing 40 words per minute and secretarial/receptionist experience. A complete job description is posted on the bulletin board at the Chapel. If you are interested and qualified, pick up an application in the Operations office and submit it to the Bible College by May 16.

APPLICATIONS ARE NOW BEING ACCEPTED for the volunteer position of tape-duplicating technician. This important ministry requires only one hour of your time after church once every three weeks. We will train you to duplicate tapes for check-out from the church tape library. Please call the Tape & Sound Ministries office (431-3180) or talk to Jim Wagner at church.

WE REGRET TO ANNOUNCE that George & Diana Alberts, Mike & Sandy Ehrlich, Dennis Pangburn, Grant Peever, and Allen Steinhauer have been put out of the church. As in all such cases, please do not have fellowship with them or discuss their situation with them. (See 2 Th. 3:6,14; 1 Cor. 5:11; Rom. 16:17; Mt. 18:17; and Tit. 3:10.)

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SEP 24 11:12:07
SUPERIOR COURT OF WASHINGTON
COUNTY OF KING

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

SANDY EHRLICH, et al.,)	
)	
Plaintiffs,)	NO. 86-2-18429-5
)	
v.)	SUPPLEMENTAL ANSWERS
)	TO INTERROGATORIES AND
RALPH ALSKOG, et al.,)	AND REQUEST FOR PRODUCTION
)	DIRECTED TO PLAINTIFF
Defendants.)	SANDY EHRLICH
)	
)	

NO. 11:

As stated in the Complaint for Personal Injuries and Damages my injuries include: Sexual exploitation, sexual assault, depression, anxiety, family disharmony, marital instability, nervousness, loss of consortium, severe emotional distress, great humiliation and defamation, shame and embarrassment.

NO. 18:

Name: Celeste Berger
Address: 1406 5th Avenue NW
Mandan, North Dakota 58544

SUPPLEMENTAL ANSWERS

LAW OFFICES OF
ADLER, GIERSCHE AND READ, P.S.
1621 SMITH TOWER
SEATTLE, WA 98104
(206) 682-4267

39
1987

1
2 Time duration and general duties: During the last week of
3 December, 1985 and the beginning of January 1986 my mother,
4 Celeste Berger, moved to Seattle because I was unable to cope
5 with household duties. Additionally, in February 1986 my mother
6 paid for a plane ticket for me to fly back to North Dakota for
7 two weeks. I was pregnant at the time. In August of 1986 my
8 parent's paid for two tickets on AmTrak for me and my five year
9 old daughter to go back to North Dakota.

10
11 Compensation: I have not compensated my mother for her help
12 when she came to visit me in December 1985 and January 1986.
13 Additionally, I have not been able to pay back to my parent's
14 the plane fare transportation costs when I went to North Dakota.

15
16 NO. 20:

17 No subsequent accidents.

18 NO. 21:

19 I took some unisome which is an over-the-counter drug, for
20 insomnia in the early part of 1986. I could not take anymore
21 due to my pregnancy. I approximate the cost of this at about
22 \$10.00.

23
24 Additionally, I have taken a few prescription drugs of my
25 husband's. Dr. Hulse was the one who prescribed this
26 prescription to my husband. The prescription was vistaril.

27
28 SUPPLEMENTAL ANSWERS

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Also, I was given several sample packs of prescription drugs. I received about a dozen samples which had six pills to each bottle and I had taken them all.

NO. 35:

Please refer to answers to Interrogatory No. 11. Also, I am depressed quite a lot from the events described in the Complaint for personal injuries. I have quite a lot of anxiety and worry and depression. This creates physical stress and develops into physical problems such as nervousness, high-blood pressure, upset stomach. During periods of depression, which appears to be an on-going thing, I will have my ups and downs, and I will also become very sluggish and have no energy.

NO. 37:

Dr. Yates told me that I was a very depressed person and I needed indepth professional counseling.

NO. 44:

In May of 1986 before Pastor Barnett disfellowshipped me, he made an announcement to the whole congregation, in the sanctuary, that my husband was in a bad way with the church and not to contact either Sandy or Mike Ehrlich.

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I also heard from someone in the church that Pastor Don Barnett had told the administrator of the bible college that if Mike Ehrlich did not enter into the "Move of God", he would not have his job anymore.

At this point I am not sure of the exact date on which he mentioned this, but at a prayer group meeting in room 107 Scott Hartley came to the meeting and said that everything that Sandy and Mike Ehrlich were saying about Pastor Barnett were lies. This was overheard by Cindy Mastriano.

NO.46:

Persons with knowledge of the sexual assault:

Virginia McMannus - She was a counselor with the Bible of Training Center. Virginia saw that I was upset one day and approached me and asked me what was wrong. I told her that Ralph Alskog was taking sexual advantage of me.

Lucy Brown - She is the pastor's wife from Yakima. I gave her a call, I believe in January or February 1986. I told her what was going on concerning the sexual assaults/exploitation by Ralph Alskog.

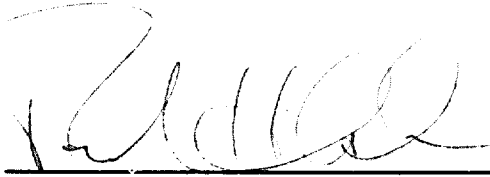
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2 Gayle Patterson - Gayle Patterson, one of Ralph
3 Alskog's "spiritual connections" saw me coming out of Ralph's
4 office one day when I was crying. I have told Gayle Patterson
5 of the things that Ralph had tried to do to me.
6

7 Sheri O'Brien - Sheri was Danny's (don't know his last
8 name) spiritual connection at the time that Ralph claimed me as
9 his spiritual connection. Sheri O'Brien was on the floor in
10 Ralph Alskog's office and Danny, Ralph and I were on the carpet
11 praying for her. Ralph was trying to rebuke the "demon of
12 legalism" from her when all of sudden she shouted "I want to
13 kiss". Danny began kissing her lightly on the face when Ralph
14 said "No, like this" and went over and showed Danny how to kiss
15 her on the lips. After that Ralph came over to me and put me on
16 the floor and unbuttoned my dress and started to caress and
17 fondle me.
18

19 Barbara Barnett - Barbara Barnett saw Ralph Alskog take
20 liberties, take sexual liberties with me in Room 107. Barbara
21 Barnett was in Room 107 with her spiritual connection Jerry, who
22 is 30 years younger than her.
23

24 Nancy Plueger - Nancy Prudner came to me and confessed
25 that her spiritual connection had oral sex with her. I than
26 confessed to Nancy Prudner of what was going on with Ralph
27 Alskog. Nancy Prudner had told me that if Jesus would have had
28 walked into the room he would have been very pleased.

1
2 SUPPLEMENTAL ANSWERS and RESPONSES submitted this 31st
3 day of July, 1987.

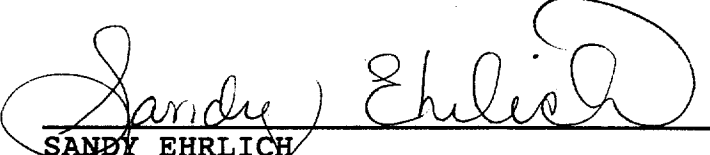


Richard H. Adler
Attorney for Plaintiffs

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8 STATE OF WASHINGTON)
9 COUNTY OF) ss.

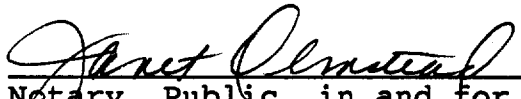
10 Sandy Ehrlich, being first duly sworn, on oath, depose
11 and say:

12 I have read the foregoing Supplemental Answers, and
13 Responses thereto, know the contents thereof, and believe the
14 same to be true.



SANDY EHRLICH

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17 SUBSCRIBED AND SWORN to before me this 31st day of
18 July, 1987.



Notary Public in and for the State
of Washington residing at _____

My commission expires: 3.30.89

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7-13-86 11:13:00

SEP 24 11:12:07
SUPERIOR COURT CLERK

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

SANDY EHRLICH, et al.,)
)
 Plaintiffs,)
)
 v.)
)
 RALPH ALSKOG, et al.,)
)
 Defendants.)

NO. 86-2-18429-5
SUPPLEMENTAL ANSWERS
TO INTERROGATORIES AND
AND REQUEST FOR PRODUCTION
DIRECTED TO PLAINTIFF
MICHAEL EHRLICH

NO. 11:

Severe on-going mental stress of a deep emotional nature;
depression and suicidal thoughts; loss of consortium; marital
instability; family disharmony; defamation and loss of
reputation; extreme financial problems due to the loss of my job
at CCBTC; insomnia; loss of my friends in the CCBTC.

NO. 18:

No. Further, I did not engage any person for employment
purposes to help around the house because of financial
constraints. My mother-in-law, however, came from North Dakota
in December of 1985 and January 1986 to help Sandy with
household duties.

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NO. 19:

No new subsequent injuries, only those described in Answer to Interrogatory No. 11.

NO. 21:

Dr. Holt prescribed vistaril for relaxation/insomnia. Additionally, I have taken some prescription drugs that were given to Sandy as samples. Additionally, I have taken over-the-counter sleeping pills. I am unsure of the cost of the vistaril. The samples given to us from the doctor were free and the over-the-counter sleeping pills cost us about \$10.00.

NO. 35:

Depression, anxiety, loss of self-esteem, nervousness; insomnia.

NO. 36:

My doctor has advised me that I should have professional counseling. I am unsure whether that would just be psychological and psychiatric. I have not been back to the doctor since I left the church because I cannot afford it.

SEP 24 11:12:07
SUPERIOR COURT CLERK
SEATTLE WA

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

SANDY EHRLICH and MICHAEL)
EHRLICH, wife and husband;)
LARRY LEMKE, parent; LARRY)
LEMKE, Guardian ad Litem on)
behalf of SYBIL N. LEMKE, a)
minor; KATHRYN REYNOLDS; DEE)
CHABOT, parent; DEE CHABOT,)
Guardian ad Litem on behalf)
of SHAWNA MICHELLE CHABOT,)
MICHAEL GRANT CHABOT, NICHOLAS)
STERLING CHABOT, minors,)

Plaintiffs,

v.

RALPH ALSKOG and ROSEMARY)
ALSKOG, husband and wife;)
ROBERT HOWERTON and JANE DOE)
HOWERTON, husband and wife;)
E. SCOTT HARTLEY and JANE DOE)
HARTLEY; DONALD LEE BARNETT)
and BARBARA BARNETT, husband)
and wife; COMMUNITY CHAPEL)
AND BIBLE TRAINING CENTER,)
a Washington corporation;)
"JOHN DOES" 1-4 and "JANE)
DOES" 1-4, husbands and wives;)
FIRST DOE CORPORATION; and)
FIRST DOE PARTNERSHIP,)

Defendants.

NO. 86-2-18429-5

INTERROGATORIES AND REQUEST
FOR PRODUCTION DIRECTED TO
PLAINTIFF

TO: DEE CHABOT, Plaintiff; and

TO: RICHARD H. ADLER, her attorney

LEE, SMART, COOK, MARTIN & PATTERSON, P.S., INC.
ATTORNEYS AT LAW
800 WASHINGTON BUILDING
1325 FOURTH AVENUE
SEATTLE, WASHINGTON 98101
(206) 624-7890

INTERROGS & REQ FOR
PRODUCTION TO PLTF - 1

41
9/24

1 Pursuant to Rule 33 and 34, Civil Rules for Superior Court,
2 you are requested to supply answers to interrogatories and request
3 for production on the following pages. As required by CR 33 and 34,
4 please enter full and complete answers to each and every part in the
5 blank space provided, inserting additional pages where necessary;
6 verify your answers on the form provided after the last interroga-
7 tory; and serve a complete set of the interrogatories, answers and
8 attachments on the undersigned and file the original with the Clerk
9 of the Court within twenty (20) days of receipt hereof.

10 These interrogatories are continuing and require supple-
11 mental answers upon discovery of additional pertinent information
12 [CR 26(e)].

13 DATED this 29 day of October, 1986.

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

16 By Michael J. Bond
17 Michael J. Bond
Of Attorneys for Defendants

- 18 1. (a) State your full name and address.
19 (b) Have you ever gone under any other name or
20 different spelling of said name? If so, what
21 name or different spelling?
22 (c) State the date and place of your birth.
23 (d) State your Social Security number.

23 ANSWER:

- 24 a) Dee Ann Chabot b) Barrios (maiden name)
1230 S. 211th c) Toppenish, WA March 28, 1951
Seattle, WA 98198 d) 537-50-5286

25 INTERROGS & REQ FOR
PRODUCTION TO PLTF - 2

LEE, SMART, COOK, MARTIN & PATTERSON, P.S., INC.
ATTORNEYS AT LAW
800 WASHINGTON BUILDING
1325 FOURTH AVENUE
SEATTLE, WASHINGTON 98101
(206) 624-7880

1 2. If you have lived in any other part of the United
2 States, name all such other places and dates.

3 ANSWER: Toppenish, WA 1951-1960
4 Moses Lake, WA 1960-1971

5
6 3. List the addresses, with the dates, where you resided
7 during the past ten years.

8 ANSWER:

9 1976 - Burien Gardens (apt. on Ambaum), Seattle, WA
10 1977 - 301 S. 185th and 10851 - 6th So, Seattle, WA
11 1978 - 10851 - 6th S. and 1230 S. 211th, Seattle, WA
12 1978 to present - 1230 S. 211th, Seattle, WA 98198

13 4. State the month and year you last attended any school,
14 the highest grade or year completed, and the name and
15 location of each such school.

16 ANSWER: North Seattle Community College, Seattle, WA 1980
17 She is going to school now.

18 5. If you are married, please state your spouse's name and
19 the date and place of your marriage. If you have been
20 married more than once, state the names and addresses of
21 previous spouses, if living, and the date and place of
22 their death or your divorce.

23 ANSWER: Grant Brian Chabot, February 23, 1974, Community Chapel and Bible
24 Training Center, Burien, WA

25 6. State the names, addresses, and ages of your children,
if any.

1 ANSWER: Nicholas Sterling Chabot, Age 6
2 Michael Grant Chabot, Age 11
3 Shawna Michelle Chabot; Age 12

4 All my children live with me at 1230 S. 211th, Seattle, WA 98198
5

6 7. List all injuries caused by any accident during your
7 lifetime, stating the place, date and nature.

8 ANSWER: Objection, vague and ambiguous, overly broad. Definition of
9 "accident" needed to answer interrogatory. Notwithstanding objection, I seriously
10 injured my knee on December 27, 1979 at Pier 37 in Seattle, WA, by falling down
11 a flight of stairs.

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15 8. Have you ever been hospitalized. If so, list the
16 approximate dates, the reasons for the hospitalization,
17 and the name and address of the hospital.

18 ANSWER:

- 19 a) Feb. 13, 1981, birth of Nicholas, Group Health Hospital, Seattle, WA
20 b) Feb. 4, 1976, birth of Michael, Providence Hospital, Seattle, WA
21 c) Jan. 14, 1975, birth of Shawna, University of Washington Hospital, Seattle, WA
22 c) March 1980, knee surgery, Marine View Hospital, Seattle, WA
23 f) 1983, pneumonia and tuberculosis, Marine View Hospital, Seattle, WA
24 g) 1984, knee surgery, Wenatchee Hospital, Wenatchee, WA
25 h) Feb. 1985, knee surgery, Wenatchee Hospital, Wenatchee, WA

1 9. List any and all sicknesses or diseases suffered during
2 your lifetime, the approximate dates thereof and periods
3 of disability (omit minor childhood diseases and illnesses).

4 ANSWER: Objection, vague and ambiguous and overly broad. Definition of
5 "the accident" needed to correctly answer interrogatory. Without waiving this
6 objection, I suffered from pneumonia and tuberculosis, and was in the hospital
7 for three weeks. Recovery took 2-3 months.

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11 10. List the names and addresses of all doctors, psychia-
12 trists, psychologists, osteopaths, chiropractors or
13 healers who have treated you the last ten years pre-
ceding the accident, the reason for the treatment, the
nature of the treatment, and the approximate dates
thereof.

14 ANSWER: Objection: vague and ambiguous. Definition of "the accident" needed
15 to correctly complete interrogatory answer. Without waiving this objection, my
16 medical providers are doctors at the Indian Health Center, University Hospital,
17 Group Health Hospital, and Marine View Hospital. I have also been treated by
18 Frederick Davis, M.D. of Seattle, WA. See answer to interrogatory no. 8.
19 Also, Dr. Collins of Wenatchee, WA.

20
21
22 11. Set forth exactly what injuries you claim you received
23 as a result of this incident.

24 ANSWER: Objection: vague and ambiguous. Definition of "this incident"
25 needed to correctly complete interrogatory answer. Without waiving this objection,
please see Plaintiff's complaint for Personal Injuries and Damages.

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12. List the names and addresses of all doctors and/or physical therapists who have treated you from the time of the occurrence alleged in your Complaint, to date.

ANSWER: Objection: vague and ambiguous. Definition of "time of the occurrence" needed to complete interrogatory. Without waiving this objection, I have seen David R. Penner, Ph.D., 12844 Military Road S., Seattle, WA

13. List the dates of treatment and/or examination by the doctors and/or physical therapists referred to by you in response to Interrogatory No. 12.

ANSWER: Seven appointments with Dr. Penner. I am unsure of dates, but I have seen him about seven times.

14. State the nature of the treatment by those doctors and/or physical therapists listed by you in response to Interrogatory No. 12.

ANSWER: Dr. Penner: counseling.

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15. Were you hospitalized as a result of your claimed injuries? If so, state the dates of hospitalization and where hospitalized.

ANSWER: No .

16. Give an itemization of all hospital and medical expenses incurred by you which you attribute to the incident alleged in your Complaint.

ANSWER: Objection: vague and ambiguous. Definition of "the incident" needed to answer interrogatory. Without waiving this objection, I have paid

17. List any other out-of-pocket expenses not heretofore mentioned that you may claim as a result of this incident.

ANSWER:
Babysitting: 57 hrs at \$3.00/hr = \$171.00
Mileage: .20/mile x miles =
Divorce: \$1750.00 at present
Quality of Life: lost husband's income.
See answer to interrogatory no. 27.

1 18. If you have engaged any person or persons to do any
2 work, at home or otherwise, that you are alleging would
3 not have been necessary if it were not for the occur-
4 rence and injuries alleged in your Complaint, state the
5 name and address of each such person or persons, the
6 period of each such employment, the general nature of
7 the duties of each such person in each such employment,
8 and the compensation paid to each such person by the
9 plaintiff for such service.

10 ANSWER: Objection: vague and ambiguous. Definition needed of
11 "the occurrence" to answer this interrogatory.

12 19. List any sickness, injury or disease suffered since the
13 time of the accident, giving names and addresses of any
14 and all physicians who have treated you therefore, and
15 the dates of hospitalization, if any.

16 ANSWER: Objection: vague and ambiguous. Definition of "time of accident"
17 needed to answer interrogatory. Without waiving this objection, I still see
18 Dr. Penner .

19
20 20. If you have been injured since the time of the incident,
21 set forth the specific details thereof as to how, when,
22 where, and the names and addresses of any other parties
23 known to you who were involved in this accident.

24 ANSWER: Objection: vague and ambiguous. Definitions of "the incident" and
25 "this accident" needed to complete this interrogatory.

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21. If, since the date of the incident alleged in your Complaint, you have had occasion to make use of any medication, state, if known, the nature of each such medication, the doctor prescribing same, the period during which each such medication was taken, and the approximate amount of money expended to date for the purchase of each such medication so listed.

ANSWER: Objection: vague and ambiguous. Definitions needed of "the incident" to answer interrogatory. Without waiving this objection, the answer is no.

22. State the names and addresses of all of your employers and the nature of your employment over the past ten years, indicating the approximate dates involved.

ANSWER:

- 1979-1980 - Gordon Brown Corp., Seattle, WA - drywall
- 1977-1978 - AAA Building Maintenance, Inc., Seattle, WA, janitor
- 1976-1977 - Jet-Inn Motel, Seattle, WA - maid

1 23. If, during any of the periods of employment mentioned
2 above, you lost time from work due to illness or acci-
3 dent, list the date, time lost, and the reason therefor.

4 ANSWER: 12/27/79 - knee injury
5
6
7
8

9 24. Were you working at the time of this incident? If so,
10 state the name, address, and telephone of your employer,
11 your job title, the nature of your employment, and
approximately how many hours you worked per week.

12 ANSWER: Objection: vague and ambiguous. Definition of "this incident"
13 needed to complete this interrogatory.
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19 25. What was your rate of pay during the time which is a
20 subject of this lawsuit?

21 ANSWER: N/A
22
23

24 26. How much time did you lose from work as a result of the
25 events alleged in your complaint.

1 ANSWER: None.
2
3

4 27. What is your total loss of wages, or income, if any, to
5 date, as a result of this incident?

6 ANSWER: Objection: vague and ambiguous. Definition of "this incident"
7 needed to complete interrogatory. Without waiving this objection, I have lost
8 my husband's monthly income of approximately \$2000.

9 28. If you have been self-employed, state for each period of
10 self-employment the net monthly earnings.

11 ANSWER: No.
12

13 29. Have you ever previously made a claim for an injury or
14 been involved in a lawsuit? If so, state the nature of
15 the action, the court or tribunal in which it was filed,
16 the cause number, disposition of the case, and the name,
17 address and telephone number of the attorney who repre-
18 sented you.

19 ANSWER: Yes, Washington State Industrial Claim for knee injury. Claim
20 No. H653620; December 27, 1979
21

22 30. Have you ever made a claim for injuries which did not
23 result in a lawsuit? If so, identify each by stating
24 when, where, the nature of the action, the disposition
25 of the case, and the name, address and telephone number
 of the attorney who represented you.

1 ANSWER: See answer to interrogatory number 29.
2
3
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6

7 31. Have you ever been convicted of a crime? If so, please
8 state for each such crime the statutory provision vio-
9 lated, the court in which the case was heard, the type
10 of disposition of the case, the cause number, and the
11 name, address and telephone of the attorney who repre-
12 sented you.

13 ANSWER: No.
14
15
16

17 32. Furnish the names, addresses, occupations, job designa-
18 tions and present location of any person known to you or
19 your attorneys, as having knowledge of relevant facts
20 pertaining to the above-entitled cause. This request is
21 intended to include all witnesses known to you or your
22 attorneys.

23 ANSWER: See attached list.
24
25

1 33. Have you given any written or oral statements to anyone
2 concerning the accident? If so, state the name and
3 address of the person or persons who took each such
statement or statements.

4 ANSWER: Objection: vague and ambiguous. Definition of "the accident"
5 needed to answer this interrogatory. Without waiving this objection, KOMO 4 TV,
6 David Penner, Ph.D.; all of Seattle, WA, and David Wilkerson, Lindale, TX
7

8 34. Do you have any photographs of any activity involving
9 the Community Chapel and Bible Training Center?

10 ANSWER: Yes.
11
12
13
14
15

16 35. Describe your present physical condition with regard to
17 any residual pain or disability which you believe is
18 related to the injuries you received.

19 ANSWER: Please see Plaintiff's Complaint for Personal Injuries and Damages
20
21
22

23 36. State what your doctors have advised you regarding the
24 necessity of further medical treatment for the injuries
25 you received.

1 ANSWER: David Penner, Ph.D. has suggested further counseling.
2
3
4
5

6 37. State what your doctors have advised you regarding the
7 possibility of permanent residual injury.

8 ANSWER: Objection: vague.
9
10
11
12
13

14 38. If you have applied for Unemployment Compensation since
15 the incident described in your Complaint, state the date
 of such application.

16 ANSWER: Objection: vague and ambiguous. Definition of "the incident" needed
17 to complete this interrogatory. Without waiving this objection, I have not applied
18 for unemployment.
19
20
21

22 39. Had you had anything of an alcoholic nature to drink
23 within 5 years before the events alleged in your
24 complaint? If so, state what you had to drink, the
25 amount thereof, when and where you consumed such
 alcoholic beverage.

1 ANSWER: Objection: vague, harassing and irrelevant.
2
3
4
5

6 40. Identify each person whom you expect to call as an
7 expert witness at trial, and as to each such person,
8 please state the following:

9 (a) Name;

10 (b) Address;

11 (c) Telephone number;

12 (d) Occupation;

13 (e) Job classification;

14 (f) Name of employer;

15 (g) Brief resume of professional and/or educa-
 tional history and qualifications.

16 ANSWER: Undetermined at this point. To be provided at a later date.
17
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22

23 41. Please state the subject matter on which each expert you
24 have listed in answer to the preceding interrogatory is
25 expected to testify.

1 ANSWER: See answer to interrogatory no. 40
2
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6 42. State the substance of the facts and opinions to which
7 each expert in answer to Interrogatory No. 42 is
8 expected to testify.

9 ANSWER: See answer to interrogatory no. 40
10
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12

13
14 43. Please state a summary of the grounds for such opinion
15 to which the experts identified in answer to Interroga-
16 tory No. 42 are expected to testify.

17 ANSWER: See answer to interrogatory no. 40
18
19
20

21
22 44. With respect to your allegation in paragraph 15.8 of
23 the complaint that "defendants have made disparaging and
24 false statements in public regarding plaintiffs to
25 members of the congregation", please state in detail the
 contents of each such statement, the identity of the
 speaker, all members of the public who heard the alleged
 statement, the date each statement was made, and the
 location where each such statement was made.

1 **ANSWER:** On or around March 30, 1986, CCBTC's Sunday morning bulletin,
2 Pastor Barnett's Disfellowship announcement listed scripture following written
3 disfellowship announcement in Bulletin did not apply to me, therefore labeling
4 me falsely. Disfellowship letter, dated March 28, 1986. Discovery is continuing.

5
6
7
8 45. Please identify the name, address and dates of atten-
9 dance of every church you attended any type of service,
10 whether it be worship service, counseling, education or
11 social meeting since January 1, 1975.

12 **ANSWER:** CCBTC - Fall 1971 - Feb. 23, 1986
13 Friday and Sunday church services, Wednesday night prayer meetings, Tuesdays and
14 Thursday "spiritual connections" dancing.
15 -- Des Moines Assembly of God, spring 1986, Friday nights, George Page and Mrs.
16 Eldred Nelson counselled me.
17 -- Puyallup Assembly of God, Summer/Fall 1986 to the present.
18 -- Cornerstone Christian, Olympia, Spring/1986
19 -- First Assembly, Federal Way, Fall 1986
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REQUEST FOR PRODUCTION NO. 1: Produce true and correct copies of all of your income tax returns for the past ten years.

RESPONSE: I think that Gratt Chabot is in possession of these records. However, I have attached what I have in my possession.

ANSWERS and RESPONSES to the foregoing INTERROGATORIES and REQUEST FOR PRODUCTION submitted this 29th day of APRIL, 1987.



RICHARD H. ADLER
Of Attorneys for Plaintiffs

1 STATE OF WASHINGTON)
2 COUNTY OF) ss.

3 The undersigned (parties to the above-entitled action, or
4 persons authorized to respond on behalf of said parties), being
5 first duly sworn, on oath, depose and say:

6 That they have read the foregoing Interrogatories, Request
7 for Production and the Answers thereto, know the contents thereof,
8 and believe the same to be true.

9
10 *Dee A. Chabot*
11 _____
12 _____

13
14 SUBSCRIBED AND SWORN to before me this 28th day of
15 April, 1987.

16
17 *Carollee Druil*
18 Notary Public in and for the State of
19 Washington; My commission expires:
20 10-25-89

21
22
23
24
25

- 1) George & Diana Alberts
Seattle, WA
- 2) Michael & Maureen Sabourin
Seattle, WA
- 3) Mark & Pede Grubbs
Kent, WA
- 4) David & Nancy Dobbs
Kent, WA
- 5) Tony & Debbie Tomaccio
Seattle, WA
- 6) Bruce & Stella Gould
Kent, WA
- 7) Mike & Sandy Ehrlich
Federal Way, WA
- 8) David Penner, Ph. D.
Seattle, WA
- 9) Detective Larry Daley
Seattle, WA
- 10) Sandy Riley
- 11) Dan & Carol Pack
- 12) Judy Prestella
Kent, WA
- 13) Allen & Linda Steinhaus
Seattle, WA
- 14) Dan & Pam Barnett
Issaquah, WA
- 15) Tom & Claudia Ryan
Auburn, WA
- 16) Ramona Banios
- 17) Lynn Sutherland

- 18) Pastor George Page
- 19) Winnie Burton
- 20) Ronald M. Enroth, Ph. D.
Santa Barbara, CA
- 21) Marc Ungar

3121211843348

1040

US Department of the Treasury—Internal Revenue Service Individual Income Tax Return

1975

For the year January 1 to December 31, 1975, or other taxable year beginning

1975, ending

19

Header section containing taxpayer information: Name (MICHAEL S. CHABOT), Social Security Number (537-50-5200), Spouse's Social Security Number (537-50-1200), Occupation (Yours/Spouse's), and Privacy Act notification.

Requested by Census Bureau for Revenue Sharing. Includes questions about city of residence, legal limits, county and state, and township.

Filing Status and Exemptions section. Includes options for Single, Married (joint or separate), Unmarried Head of Household, and Qualifying widow(er). Also includes dependent children information.

Presidential Election Campaign Fund. Questions about designating taxes for the fund.

Income section table with rows for Wages (9), Dividends (10a), Interest (11), Other income (12), Total (13), Adjustments (14), and Adjusted Gross Income (15).

Instructions for line 15: If you do not itemize deductions and line 15 is under \$15,000, find tax in Tables and enter on line 16a. If you itemize deductions or line 15 is \$15,000 or more, go to line 43 to figure tax.

Tax, Payments and Credits section. Includes Tax Tables/Schedule D, Tax Rate Schedules X, Y, Z, G, or Form 4726, Credits (17), Other taxes (19), Total Federal income tax withheld (21a), and Total (22).

Balance Due or Refund section. Includes lines for Balance Due IRS (23), Overpaid (24), Refunded to you (25), and Amount of line 24 to be credited (26).

Declaration and Signature section. Includes a declaration of truthfulness and lines for taxpayer, preparer, and spouse signatures.

Please attach Copy B of Forms W-2 here

Please attach Check or Money Order here

Pay amount on line 23 in full with this return. Write social security number on check or money order and make payable to Internal Revenue Service.

If all of overpayment (line 24) is to be refunded (line 25), make no entry on line 26.

Form

1040

U.S. Individual Income Tax Return

1976

This space for IRS use only

107116056

For the year January 1-December 31, 1976, or other taxable year beginning:

1976 ending

19

US 534-56-3748 537-50-5286 D91 1
GRANT R & DELORES A CHABOT
301 5 185TH 10851 6th So
SEATTLE WA. 98148 98168

Last name: GRANT
Your social security number: 534 56 3748
Spouse's social security no.: 537 50 5286
Occupation: Yours - BELMAN / JUNIOR, Spouse's - JUNIOR / MAID

Filing Status: 1 Single, 2 Married filing joint return (checked), 3 Married filing separately, 4 Unmarried Head of Household, 5 Qualifying widow(er) with dependent child.

Exemptions: 6a Regular (checked) Yourself (checked) Spouse (checked), b First names of your dependent children who lived with you: SHAWNA, MICHAEL, c Number of other dependents (from line 7), d Total (add lines 6a, b, and c), e Age 65 or older, f TOTAL (add lines 6d and e).

Table with 5 columns: (a) Name, (b) Relationship, (c) Months lived in your home, (d) Did dependent have income of \$750 or more?, (e) Amount furnished for dependent's support.

8 Presidential Election Campaign Fund: Do you wish to designate \$1 of your taxes for this fund? (Yes/No)

Income section: 9 Wages, salaries, tips, and other employee compensation; 10a Dividends; 11 Interest income; 12 Income other than wages, dividends, and interest; 13 Total; 14 Adjustments to income; 15a Subtract line 14 from line 13; 15b Disability income exclusion; 15c Adjusted gross income.

16 Tax, check if from: Tax Table (checked), Tax Rate Schedule X, Y or Z, Schedule D, Schedule G, Form 2555, OR Form 4726.

17a Multiply \$35.00 by the number of exemptions on line 6d; 17b Enter 2% of line 17a but not more than \$180; 18 Balance; 19 Credits; 20 Balance; 21 Other taxes; 22 Total (add lines 20 and 21).

23a Total Federal income tax withheld; 23b 1976 estimated tax payments; 23c Earned income credit; 23d Amount paid with Form 4868; 23e Other payments; 24 TOTAL (add lines 23a through e).

25 If line 22 is larger than line 24, enter BALANCE DUE IRS; 26 If line 24 is larger than line 22, enter amount OVERPAID; 27 Amount of line 26 to be REFUNDED TO YOU; 28 Amount of line 26 to be credited on 1977 estimated tax.

Under penalties of perjury, I declare that I have examined this return, including accompanying schedules and statements, and to the best of my knowledge and belief it is true, correct, and complete. Declaration of preparer (other than taxpayer) is based on all information of which preparer has any knowledge.
Signatures: Grant Edwin Chabot, DeLores Ann Chabot. Date: 3/1/77.

Please attach Copy B of Forms W-2 here

Please attach Check or Money Order here

Sign here

8

Part I Income other than Wages, Dividends and Interest

29	Business income or (loss) (attach Schedule C)	29	
30a	Net gain or (loss) from sale or exchange of capital assets (attach Schedule D)	30a	
b	50% of capital gain distributions (not reported on Schedule D—see page 10 of Instructions)	30b	
31	Net gain or (loss) from Supplemental Schedule of Gains and Losses (attach Form 4797)	31	
32a	Pensions, annuities, rents, royalties, partnerships, estates or trusts, etc. (attach Schedule E)	32a	
b	Fully taxable pensions and annuities (not reported on Schedule E—see page 10 of Instructions)	32b	
33	Farm income or (loss) (attach Schedule F)	33	
34	State income tax refunds (does not apply if refund is for year in which you took the standard deduction—others see page 10 of Instructions)	34	
35	Alimony received	35	
36	Other (state nature and source—see page 11 of Instructions)	36	
37	Total (add lines 29 through 36). Enter here and on line 12	37	8

Part II Adjustments to Income

38	Moving expense (attach Form 3903)	38	
39	Employee business expense (attach Form 2106)	39	
40a	Payments to an individual retirement arrangement from attached Form 5329, Part III	40a	
b	Payments to a Keogh (H.R. 10) retirement plan	40b	
41	Forfeited interest penalty for premature withdrawal (see page 12 of Instructions)	41	
42	Total (add lines 38 through 41). Enter here and on line 14	42	

Part III Tax Computation

43	Adjusted gross income (from line 15c). If you have unearned income and can be claimed as a dependent on your parent's return, check here <input type="checkbox"/> and see page 9 of Instructions	43	11603
44a	If you itemize deductions, check here <input type="checkbox"/> , and enter total from Schedule A, line 40, and attach Schedule A		
b	Standard deduction—If you do not itemize deductions, check here <input checked="" type="checkbox"/> , and:		
	If you checked the box on line 2 or 5, enter the greater of \$2,100 OR 16% of line 43—but not more than \$2,800	44	2100
	1 or 4, enter the greater of \$1,700 OR 16% of line 43—but not more than \$2,400		
	3, enter the greater of \$1,050 OR 16% of line 43—but not more than \$1,400		
45	Subtract line 44 from line 43 and enter difference (but not less than zero)	45	9503
46	Multiply total number of exemptions claimed on line 6f by \$750	46	3000
47	Taxable income. Subtract line 46 from line 45 and enter difference (but not less than zero)	47	6503

- If line 47 is \$20,000 or less and you did not average your income on Schedule G, or figure your tax on Form 2555, Exemption of Income Earned Abroad, find your tax in Tax Table. Enter tax on line 16 and check appropriate box.
- If line 47 is more than \$20,000, figure your tax on the amount on line 47 by using Tax Rate Schedule X, Y, Z, or if applicable, the alternative tax from Schedule D, income averaging from Schedule G, tax from Form 2555 or maximum tax from Form 4726. Enter tax on line 16 and check appropriate box.

Part IV Credits

48	Credit for the elderly (attach Schedules R & RP)	48	
49	Credit for child care expenses (attach Form 2441)	49	
50	Investment credit (attach Form 3468)	50	
51	Foreign tax credit (attach Form 1116)	51	
52	Contributions to candidates for public office credit (see page 12 of Instructions)	52	
53	Work Incentive (WIN) Credit (attach Form 4874)	53	
54	Total (add lines 48 through 53). Enter here and on line 19	54	8

Part V Other Taxes

55	Tax from recomputing prior-year investment credit (attach Form 4255)	55	
56	Minimum tax. Check here <input type="checkbox"/> , and attach Form 4625	56	
57	Tax on premature distributions from attached Form 5329, Part V	57	
58	Self-employment tax (attach Schedule SE)	58	
59	Social security tax on tip income not reported to employer (attach Form 4137)	59	
60	Uncollected employee social security tax on tips (from Forms W-2)	60	
61	Excess contribution tax from attached Form 5329, Part IV	61	
62	Total (add lines 55 through 61). Enter here and on line 21	62	8

Part VI Other Payments

63	Excess FICA, RRTA, or FICA/RRTA tax withheld (two or more employers—see page 13 of Instructions)	63	
64	Credit for Federal tax on special fuels, nonhighway gasoline and lubricating oil (attach Form 4136)	64	
65	Credit from a Regulated Investment Company (attach Form 2439)	65	
66	Total (add lines 63 through 65). Enter here and on line 23e	66	8

PHOTOCOPIED

1040A

Department of the Treasury--Internal Revenue Service
U.S. Individual Income Tax Return

1977

PHOTOCOPY
9/20908401013

Use IRS label, otherwise, print or type.

US 534-56-3748 537-50-5286 D91 5
GRANT B & DELUCES A CHABOT
10851 6TH S
SEATTLE WA 98168

Last name: GRANT
Your social security number: 534 56 3748
Spouse's social security no.: 537 50 5286

For Privacy Act Notice, see page 9 of Instructions.

Occupation: Yours: FLIPNICK CLEANER Spouse's: NONE

Presidential Election Campaign Fund

Do you want \$1 to go to this fund? Yes No
If joint return, does your spouse want \$1 to go to this fund? Yes No

Note: Checking "Yes" will not increase your tax or reduce your refund.

Filing Status

1 Single
2 Married filing joint return (even if only one had income)
3 Married filing separately. If spouse is also filing, give spouse's social security number in the space above and enter full name here
4 Unmarried Head of Household. Enter qualifying name

Check Only One Box

See page 6 of Instructions.

Exemptions

Always check the "Yourself" box. Check other boxes if they apply.

5a Yourself 65 or over Blind
b Spouse 65 or over Blind
c First names of your dependent children who lived with you: SHARON, MIKE

Enter number of boxes checked on 5a and b: 2
Enter number of children listed: 2

d Other dependents:	(2) Relationship	(3) Number of months lived in your home.	(4) Did dependent have income of \$750 or more?	(5) Did you provide more than one-half of dependent's support?	Enter number of other dependents
(1) Name					

6 Total number of exemptions claimed: 4

7 Wages, salaries, tips, and other employee compensation. (Attach Forms W-2. If unavailable, see page 11 of Instructions)	7	13693 50
8 Interest income (see page 4 of Instructions)	8	0
9a Dividends	9b Less exclusion	9c Balance
(See pages 4 and 11 of Instructions)		
10 Adjusted gross income (add lines 7, 8, and 9c). If under \$8,000, see page 2 of Instructions on "Earned Income Credit." If eligible, enter child's name	10	13693 50

11a Credit for contributions to candidates for public office. Enter one-half of amount paid but do not enter more than \$25 (\$50 if joint return)	11a	
IF YOU WANT IRS TO FIGURE YOUR TAX, PLEASE STOP HERE AND SIGN BELOW.		
b Total Federal income tax withheld (if line 7 is larger than \$16,600, see page 12 of Instructions)	11b	1474 00
c Earned income credit (from page 2 of Instructions)	11c	

12 Total (add lines 11a, b, and c)	12	1474 00
13 Tax on the amount on line 10. (See Instructions for line 13 on page 12, then find your tax in Tax Tables on pages 14-25.)	13	1131 00
14 If line 12 is larger than line 13, enter amount to be REFUNDED TO YOU.	14	343 00
15 If line 13 is larger than line 12, enter BALANCE DUE. Attach check or money order for full amount payable to "Internal Revenue Service." Write social security number on check or money order	15	

Under penalties of perjury, I declare that I have examined this return, including accompanying schedules and statements, and to the best of my knowledge and belief, it is true, correct, and complete. Declaration of preparer (other than taxpayer) is based on all information of which preparer has any knowledge.

Please Sign

Your signature: Grant Brian Chabot 3/11/78
Date: 3/11/78
Paid preparer's signature and identifying number (see instructions)

Spouse's signature (if filing jointly, BOTH must sign even if only one had income): Delores Ann Chabot 3/11/78
Paid preparer's address (or employer's name, address, and identifying number)

Schedules A & B—Itemized Deductions AND Interest and Dividend Income

(Form 1040)
Department of the Treasury
Internal Revenue Service

▶ Attach to Form 1040. ▶ See Instructions for Schedules A and B (Form 1040).

1978

Name(s) as shown on Form 1040

Your social security number

Schedule A—Itemized Deductions (Schedule B is on back)

Medical and Dental Expenses (not paid by insurance or otherwise) (See page 15 of Instructions.)

1 One-half (but not more than \$150) of insurance premiums you paid for medical care. (Be sure to include in line 10 below.) ▶		
2 Medicine and drugs		
3 Enter 1% of Form 1040, line 31		
4 Subtract line 3 from line 2. If line 3 is more than line 2, enter zero		
5 Balance of insurance premiums for medical care not entered on line 1		
6 Other medical and dental expenses:		
a Doctors, dentists, nurses, etc.		
b Hospitals		
c Other (itemize—include hearing aids, dentures, eyeglasses, transportation, etc.) ▶		
7 Total (add lines 4 through 6c)		
8 Enter 3% of Form 1040, line 31		
9 Subtract line 8 from line 7. If line 8 is more than line 7, enter zero		
10 Total medical and dental expenses (add lines 1 and 9). Enter here and on line 33 ▶		

Taxes (See page 15 of Instructions.)

11 State and local income		
12 Real estate		
13 State and local gasoline (see gas tax tables)	277	00
14 General sales (see sales tax tables)	300	00
15 Personal property	1328	
16 Other (itemize) ▶	81	60
<i>Chrysler</i>	27	00
<i>Purple</i>		
<i>Car Tabs</i>	20	00
17 Total taxes (add lines 11 through 16). Enter here and on line 34	1983	60

Interest Expense (See page 16 of Instructions.)

18 a Home mortgage		
b Credit and charge cards		
19 Other (itemize) ▶	10	00
<i>Ban</i>	34	39
<i>Penn</i>	32	84
<i>Lot</i>	315	79
<i>Master + Discover</i>	40	00
<i>Reserv</i>	62	87
20 Total interest expense (add lines 18a through 19). Enter here and on line 35 ▶	495	89

Contributions (See page 17 of Instructions.)

21 a Cash contributions for which you have receipts, cancelled checks or other written evidence	804	00
b Other cash contributions (show who you gave to and how much you gave) ▶		
22 Other than cash (see page 17 of instructions for required statement)		
23 Carryover from prior years		
24 Total contributions (add lines 21a through 23). Enter here and on line 36	804	00

Casualty or Theft Loss(es) (See page 17 of Instructions.)

25 Loss before insurance reimbursement		
26 Insurance reimbursement		
27 Subtract line 26 from line 25. If line 26 is more than line 25, enter zero		
28 Enter \$100 or amount on line 27, whichever is smaller		
29 Total casualty or theft loss(es) (subtract line 28 from line 27). Enter here and on line 37		

Miscellaneous Deductions (See page 17 of Instructions.)

30 Union dues	182	00
31 Other (itemize) ▶	137	45
<i>School for Taping</i>	10	80
<i>Taping Tools</i>	50	00
<i>Overalls @ 12.50</i>	30	00
32 Total miscellaneous deductions (add lines 30 and 31). Enter here and on line 38 ▶	416	

Summary of Itemized Deductions (See page 18 of Instructions.)

33 Total medical and dental—from line 10		
34 Total taxes—from line 17		
35 Total interest—from line 20		
36 Total contributions—from line 24		
37 Total casualty or theft loss(es)—from line 29		
38 Total miscellaneous—from line 32		
39 Total deductions (add lines 33 through 38) ▶	3699	49
40 If you checked Form 1040, Filing Status box: 2 or 5, enter \$3,200 1 or 4, enter \$2,200 3, enter \$1,600	3200	00
41 Subtract line 40 from line 39. Enter here and on Form 1040, line 33. (If line 40 is more than line 39, enter zero and see "You Must Itemize Deductions" on page 11 of the Instructions.)	499	49

Income Averaging

▶ See instructions on pages 3 and 4.
▶ Attach to Form 1040.

1978

Name(s) as shown on Form 1040

Your social security number

Base Period Income and Adjustments	(a) 1st preceding base period year 1977		(b) 2d preceding base period year 1976		(c) 3rd preceding base period year 1975		(d) 4th preceding base period year 1974	
	1 Enter amount from: Form 1040 (1977)—line 34 Form 1040A (1977)—line 10							
2 Multiply \$750 by the total number of exemp- tions claimed in 1977	3 000							
3 Taxable income (subtract line 2 from line 1). If less than zero, enter zero (see instructions) .	11,000		6747		3920		3663	89
4 Income earned outside of the United States or within U.S. possessions and excluded un- der sections 911 and 931								
5 If you checked, on (2 or 5 enter \$3,200) (in columns your 1978 Form 1 or 4 enter \$2,200) (b), (c) 1040, box (3 enter \$1,600 . . .) (and (d) . . .)			3200		3200		3200	
6 Base period income (add lines 3, 4 and 5) .	11,000		9947		7120		6864	

Computation of Averageable Income							
7 Taxable income for 1978 from Schedule TC (Form 1040), Part I, line 3	7	16,759	39				
8 Certain amounts received by owner-employees subject to a penalty under sec- tion 72(m)(5)	8						
9 Subtract line 8 from line 7	9	16,759	39				
10 Excess community income	10						
11 Adjusted taxable income (subtract line 10 from line 9). If less than zero, enter zero .	11	16,759	39				
12 Add columns (a) through (d), line 6, and enter here	12	34931	100				
13 Enter 30% of line 12	13	10,479	3				
14 Averageable income (subtract line 13 from line 11)	14	6280	00				

Do not complete rest of form if line 14 is \$3,000 or less. You do not qualify for income averaging.

G

Computation of Tax							
15 Amount from line 13	15	10,479	30				
16 20% of line 14	16	1256					
17 Total (add lines 15 and 16)	17	11,735	30				
18 Excess community income from line 10	18						
19 Total (add lines 17 and 18)	19	11735	30				
20 Tax on amount on line 19*	20	1497					
21 Tax on amount on line 17*	21						
22 Tax on amount on line 15*	22	1243					
23 Subtract line 22 from line 21	23	254					
24 Multiply the amount on line 23 by 4	24	1016					
<i>Note: If no entry was made on line 8 above, skip lines 25 through 27 and go to line 28.</i>							
25 Tax on amount on line 7*	25						
26 Tax on amount on line 9*	26						
27 Subtract line 26 from line 25	27						
28 Tax (add lines 20, 24, and 27). Enter here and on Schedule TC (Form 1040), Part I, line 4 and check Schedule G box. Then go to Schedule TC (Form 1040), Part I, line 5	28	2513	00				

*Caution: Use Tax Rate Schedule X, Y or Z from the Form 1040 instructions to figure your tax on lines 20, 21, 22, 25 and 26. Do not use tax tables.

Computations on this page are not needed unless you used the tax tables for 1975 or 1974.

Computation of Taxable Income for 1975 if You Used the Tax Tables

		1975	
1 Enter amount from: Form 1040 (1975), line 15 } Form 1040A (1975), line 12 }	1	8070 30
2 a Enter 16% of line 1: but not more than \$2,300 if you were single (or a head of household) } but not more than \$1,300 if you were married filing separately }	2a	1291
b Enter: \$1,900 if you were married filing jointly (or a qualifying widow(er)) } \$1,600 if you were single (or a head of household) } \$950 if you were married filing separately }	2b	1900
c Standard deduction. Enter line 2a or b whichever is more. (If you were married and filed separately and your spouse used the percentage standard deduction (line 2a), then you must also use it.)	2c	1900 00
3 Subtract line 2c from line 1	3	6170 30
4 Multiply \$750 by the total number of exemptions claimed	4	2250
5 Taxable income (subtract line 4 from line 3). Enter here and on page 1, line 3, column (c)	5	3920

Computation of Taxable Income for 1974 if You Used the Tax Tables

		1974	
1 Enter amount from: Form 1040 (1974), line 15 } Form 1040A (1974), line 12 }	1	6463 84
2 a Enter 15% of line 1 (limited to \$1,000 if you were married and filed separately)	2a	969 57
b Enter \$1,300 (\$650 if you were married and filed separately)	2b	1300
c Standard deduction. Enter line 2a or b whichever is more. (If you were married and filed separately and your spouse used the percentage standard deduction (line 2a), then you must also use it.)	2c	1300
3 Subtract line 2c from line 1	3	5163 84
4 Multiply \$750 by the total number of exemptions claimed	4	1500
5 Taxable income (subtract line 4 from line 3). Enter here and on page 1, line 3, column (d)	5	3663 84

**Application for Automatic Extension of Time
 to File U.S. Individual Income Tax Return**

1978

Note: File this form with the Internal Revenue Service Center where you are required to file your income tax return and pay the amount shown on line 6 below. This is not an extension of time for payment of tax. The law requires that a penalty be charged for late payment of tax unless you show reasonable cause for not paying the tax when due. (See Instruction F.)

Please Print or Type	Name (If joint return, give first names and initials of both)	Last name	Your social security number
	GRANT R. Deloree A CHABOT		534:56:3748
	Present home address (Number and street, including apartment number, or rural route)		Spouse's social security no.
	1230 S 5th St		53750:5286
	City, town or post office, State and ZIP code		
	Seattle WASH 98148		

An automatic 2-month extension of time until June 15, 1979, is requested in which to file Form 1040 for the calendar year 1978 (or if a fiscal year return until, 19....., for the tax year beginning, 1978, and ending, 1979).

1 Total tax you expect to owe for 1978 (see instruction C)		2,333
2 Federal income tax withheld	284390	
3 1978 Estimated tax payments (include 1977 overpayment allowed as a credit)	—	
4 Other payments (see instruction C)	—	
5 Total (add lines 2, 3, and 4)		<510.00>
6 BALANCE DUE (subtract line 5 from line 1). Pay in full with this form		<510.00>

Signature and Verification

If Prepared by Taxpayer.—Under penalties of perjury, I declare that I have examined this form, including accompanying schedules and statements, and to the best of my knowledge and belief, it is true, correct, and complete.

Your signature Grant R. Chabot Date 3/29/79

Spouse's signature (if filing jointly, BOTH must sign even if only one had income) _____ Date _____

If Prepared by Someone Other Than Taxpayer.—Under penalties of perjury, I declare that I have examined this form, including accompanying schedules and statements, and to the best of my knowledge and belief, it is true, correct, and complete, that I am authorized to prepare this form, and that I am:

- A member in good standing of the bar of the highest court of (specify jurisdiction) _____
- A certified public accountant duly qualified to practice in (specify jurisdiction) _____
- A person enrolled to practice before the Internal Revenue Service.
- A duly authorized agent holding a power of attorney. (The power of attorney need not be submitted unless requested.)
- A person standing in close personal or business relationship to the taxpayer who is unable to sign this form because of illness, absence, or other good cause. My relationship to the taxpayer and the reasons why the taxpayer is unable to sign this form are _____

Signature of preparer other than taxpayer _____ Date _____

**SCHEDULE TC
(Form 1040)**

Department of the Treasury
Internal Revenue Service

Tax Computation Schedule

▶ Attach to Form 1040.

1978

Name(s) as shown on Form 1040

Your social security number

Part I Computation of Tax for Taxpayers Who Cannot Use the Tax Tables

Use this part to figure your tax if:

- Your income on Form 1040, line 34, is more than \$20,000 and you checked Filing Status Box 1, 3, or 4 on Form 1040.
- Your income on Form 1040, line 34, is more than \$40,000 and you checked Filing Status Box 2 or 5 on Form 1040.

• You had more exemptions than were covered in the Tax Table for your filing status.

• You figure your tax using the alternative tax computation on Schedule D (Capital Gains and Losses), Schedule G (Income Averaging), or Form 4726 (Maximum Tax on Personal Service Income).

1	Enter the amount from Form 1040, line 34	1	19759	39
2	Multiply \$750 by the total number of exemptions claimed on Form 1040, line 7	2	3000	
3	Taxable Income. Subtract line 2 from line 1. (Figure your tax on this amount by using the Tax Rate Schedules or one of the other methods listed on line 4.)	3	16,759	39
4	Income Tax. Enter tax and check if from: <input type="checkbox"/> Tax Rate Schedule X, Y, or Z, <input type="checkbox"/> Schedule D, <input checked="" type="checkbox"/> Schedule G, or <input type="checkbox"/> Form 4726	4	2513	
General Tax Credit				
5	Multiply \$35 by the total number of exemptions claimed on Form 1040, line 7. (If you are married filing a separate return, skip lines 6 through 9 and enter the amount from line 5 on line 10.)	5	140	00
6	Enter the amount from line 3, above	6	16,759	39
7	Enter { \$3,200 if you are married filing a joint return or a qualifying widow(er) } { \$2,200 if you are single or an unmarried head of household }	7	3200	
8	Subtract line 7 from line 6	8	13,559	39
9	Enter 2% of line 8 (but do not enter more than \$180)	9	180	
10	General tax credit. Enter the amount from line 5 or line 9, whichever is larger	10	180	
11	Tax. Subtract line 10 from line 4. (If \$0 or less, enter \$0.) Enter this amount on Form 1040, line 35 ▶	11	2333	

TC

Part II Computation for Certain Taxpayers Who Must Itemize Deductions

If you are included in one of the groups below, you MUST itemize. If you must itemize and the amount on Schedule A (Form 1040), line 40, is more than your itemized deductions on Schedule A, line 39, you must complete Part II before figuring your tax.

You MUST itemize your deductions if:

A. You can be claimed as a dependent on your parent's return and had interest, dividends, or other unearned income of \$750 or more and less than \$2,200 of earned income if single (less than \$1,600 if married filing a separate return).

Note: If your earned income is more than your itemized deductions on Schedule A, line 39, enter your earned income in Part II, line 3, of this schedule, unless you are married filing a separate return and your spouse itemizes deductions. Generally, your earned income is the total of any amounts on Form 1040, lines 8,

13, and 19. See page 11 of the Instructions for Form 1040 for more details.

B. You are married filing a separate return and your spouse itemizes deductions. (There is an exception to this rule. You don't have to itemize if your spouse must itemize only because he or she is described in A and enters earned income instead of itemized deductions on Part II, line 3, of this schedule. If this is the case, don't complete Part II. Go back to Form 1040, line 33, and enter \$0. Then go to Form 1040, line 34.)

C. You file Form 4563 to exclude income from sources in U.S. possessions. (Please see Form 4563, and Publication 570, Tax Guide for U.S. Citizens Employed in U.S. Possessions, for more details.)

D. You had dual status as a nonresident alien for part of 1978, and during the rest of the year you were either a resident alien or a U.S. citizen. However, you don't have to itemize if at the end of 1978, you were married to a U.S. resident or citizen and file a joint return reporting your combined worldwide income.

1	Enter the amount from Form 1040, line 31	1		
2	Enter the amount from Schedule A, line 40	2		
3	Enter the amount from Schedule A, line 39	3		
Caution: If you can be claimed as a dependent on your parent's return, see the Note above. Be sure you check the box below line 33 of Form 1040.				
4	Subtract line 3 from line 2	4		
5	Add lines 1 and 4. Enter here and on Form 1040, line 34. (Leave Form 1040, line 33 blank. Disregard the instruction to subtract line 33 from line 32. Follow the rest of the instructions for Form 1040, line 34.) ▶	5		

								Copy C For employee's records	
3 Employer's identification number		4 Employer's State number		5 Stat. employee		Deceased		Pension plan	
				Legal rep.		942 emp.		Cor-rection	
6		7 Advance EIC payment		8 Employee's social security number		9 Federal income tax withheld		10 Wages, tips, other compensation	
								11 FICA tax withheld	
12 Employee's name, address, and ZIP code		13 FICA wages		14 FICA tips		16 Employer's use		17 State income tax	
								18 State Wages, tips, etc.	
								19 Name of State	
								20 Local income tax	
								21 Local wages, tips, etc.	
								22 Name of locality	

Form **W-2 Wage and Tax Statement 1980** This information is being furnished to the Internal Revenue Service. Department of the Treasury Internal Revenue Service 13-2578063 IRS APP. 6/80

1 Control number		22222		3 Employer's identification number		4 222-299-00	
2 Employer's name, address, and ZIP code		GORDON BROWN, INC. P.O. BOX 18225 SEATTLE, WA 98118		5 Stat. employee		Deceased	
				Pension plan		Legal rep.	
				942 emp.		Sub-total	
				Cor-rection		Void	
8 Employee's social security number		9 Federal income tax withheld		6 *		7 Advance EIC payment	
537-50-5286		275.17		10 Wages, tips, other compensation		11 FICA tax withheld	
				1991.36		122.06	
12 Employee's name (first, middle, last)		13 FICA wages		14 FICA tips		16 Employer's use	
DELORES A CHABOT		1991.36					
15 Employee's address and ZIP code		1230 S 211 ST SEATTLE WA 98143					

Form **W-2 Wage and Tax Statement 1980**

Copy C For employee's records
This information is being furnished to the Internal Revenue Service.

Department of the Treasury
Internal Revenue Service

Statement for Recipients of **1980**

Nonemployee Compensation

**Copy B
For Recipient**

RED 'S INSULATION CO. INC.
2962 1st Ave. So.
Seattle, Washington
98134
91-0964243

Type or print
PAYER'S
name, address,
ZIP code, and
Federal
identifying
number.

Recipient's identifying number	1 Fees, commissions, and other compensation
534-56-3748	\$ 70.28

Type or print **RECIPIENT'S** name, address, and ZIP code below.

GRANT BRAIN CHABOT
1230 So. 211th
Seattle, Washington
98148

See instructions on back of this copy.

This information is being furnished to the Internal Revenue Service.

1 Control Number 22222		3 Employer's Identification Number 91-1100920		4 Employer's State Number	
2 Employer's Name, Address, and ZIP Code SLEEP WING INN 18601 PACIFIC HWY S. SEATTLE WA 98188 522412001100		5 Stat Employee <input type="checkbox"/>		6 Deceased <input type="checkbox"/>	
8 Employee's Social Security Number 534-56-3743		9 Federal income Tax Withheld		10 Wages, Tips, Other Compensation	
12 Employee's Name, Address, and ZIP Code GRANT BRAIN CHABOT 1230 S 211TH ST SEATTLE WA 98148 -0124- - 174-		13 FICA Wages		14 FICA Tips	
17 State Income Tax		18 State Wages, Tips, Etc.		19 Name of State	
20 Local Income Tax		21 Local Wages, Tips, Etc.		22 Name of Locality	

000074		Control Number	Form W-2 Wage and Tax Statement 1980		Copy C For employee's records Department of the Treasury—Internal Revenue Service			
2 Employer's name, address, and ZIP code AAA BUILDING MAINTENANCE INC 424 10TH AVE SOUTH SEATTLE WA 98104			3 Employer's identification number 91-0027046		4 Employer's State number			
8 Employee's social security number 537-50-5286			9 Federal income tax withheld		5 Stat employee <input type="checkbox"/>		6 Group term life ins. included in Box 10	
12 Employee's name, address, and ZIP code DIFLORES A CHABOT 1230 S 211TH ST SEATTLE WA 98148			10 Wages, tips, other compensation 6.44		11 FICA tax withheld		7 Advance EIC payment	
			13 FICA wages 6.44		14 FICA tips			
			16 State unemp/dis w/h		Other compensation		State form number	
			17 State income tax		18 State wages, tips, etc		19 Name of State	
			20 Local income tax		21 Local wages, tips, etc		22 Name of locality	

This information is being furnished to the Internal Revenue Service.

PAYER: STATE OF WASHINGTON
EMPLOYMENT SECURITY DEPARTMENT B-2
OLYMPIA, WASHINGTON 98504
FED I.D. NO. 91-6001099

THIS INFORMATION SHOULD BE USED IN
PREPARING YOUR INCOME TAX RETURN

Statement for
Recipients of
**Unemployment
Compensation Payments**
Copy B - For Recipient

DEPARTMENT OF THE TREASURY INTERNAL REVENUE SERVICE	Recipient's Identifying No. 537-50-5286	1. Total Unemployment Compensation Payments 1,695.00	UI	Calendar Year 1980
	Recipient's Name and Address CHABOT DIFLORES A 1230 S 211TH ST SEATTLE WA 98148		REC. # 71601 THIS INFORMATION IS BEING FURNISHED TO THE INTERNAL REVENUE SERVICE	

1040 U.S. Individual Income Tax Return 1980

Department of the Treasury—Internal Revenue Service

For Privacy Act Notice, see Instructions for the year January 1-December 31, 1980, or other tax year beginning 1980, ending 19

USE IRS FORM 1040-80 US 834-56-3740 537-50-5286 091 0 GRANT CHARACT 53143	Last name GRANT	Your social security number 534 56 3740
--	--------------------	--

Presidential Election Campaign Fund Do you want \$1 to go to this fund? Yes No
 If joint return, does your spouse want \$1 to go to this fund? Yes No

Note: Checking "Yes" will not increase your tax or reduce your refund.

Requested by Census Bureau for Revenue Sharing
 A Where do you live (actual location of residence)? (See page 2 of Instructions.)
 State: WA City, village, borough, etc.: Seattle
 B Do you live within the legal limits of a city, village, etc.? Yes No
 C In what county do you live? King
 D In what township do you live?

Filing Status
 1 Single
 2 Married filing joint return (even if only one had income)
 3 Married filing separate return. Enter spouse's social security no. above and full name here
 4 Head of household. (See page 6 of Instructions.) If qualifying person is your unmarried child, enter child's name
 5 Qualifying widow(er) with dependent child (Year spouse died 19). (See page 6 of Instructions.)

Exemptions
 a Yourself 65 or over Blind
 b Spouse 65 or over Blind
 c First names of your dependent children who lived with you: *Sharna, Mishael*
 d Other dependents:
 (1) Name (2) Relationship (3) Number of months lived in your home (4) Did dependent have income of \$1,000 or more? (5) Did you provide more than one-half of dependent's support?
 7 Total number of exemptions claimed: 4

Income
 8 Wages, salaries, tips, etc. 8 23000
 9 Interest income (attach Schedule B if over \$400) 9
 10a Dividends (attach Schedule B if over \$400) 10a
 10b Exclusion 10b
 10c Subtract line 10b from line 10a 10c
 11 Refunds of State and local income taxes (do not enter an amount unless you deducted those taxes in an earlier year—see page 9 of Instructions) 11
 12 Alimony received 12
 13 Business income or (loss) (attach Schedule C) 13
 14 Capital gain or (loss) (attach Schedule D) 14
 15 40% of capital gain distributions not reported on line 14 (See page 9 of Instructions) 15
 16 Supplemental gains or (losses) (attach Form 4797) 16
 17 Fully taxable pensions and annuities not reported on line 18 17
 18 Pensions, annuities, rents, royalties, partnerships, etc. (attach Schedule E) 18
 19 Farm income or (loss) (attach Schedule F) 19
 20a Unemployment compensation (insurance). Total received 1695
 20b Taxable amount, if any, from worksheet on page 10 of Instructions 20b 0
 21 Other income (state nature and source—see page 10 of Instructions) 21
 22 Total income. Add amounts in column for lines 8 through 21. 22 23000

Adjustments to Income
 23 Moving expense (attach Form 3903 or 3903F) 23
 24 Employee business expenses (attach Form 2106) 24
 25 Payments to an IRA (enter code from page 10) 25
 26 Payments to a Keogh (H.R. 10) retirement plan 26
 27 Interest penalty on early withdrawal of savings 27
 28 Alimony paid 28
 29 Disability income exclusion (attach Form 2440) 29
 30 Total adjustments. Add lines 23 through 29. 30

Adjusted Gross Income
 31 Adjusted gross income. Subtract line 30 from line 22. If this line is less than \$10,000, see "Earned Income Credit" (line 57) on pages 13 and 14 of Instructions. If you want IRS to figure your tax, see page 3 of Instructions. 31 23000

Tax Computation

(See instructions on page 11)

32	Amount from line 31 (adjusted gross income)	32	23000
33	If you do not itemize deductions, enter zero. If you itemize, complete Schedule A (Form 1040) and enter the amount from Schedule A, line 41. Caution: If you have unearned income and can be claimed as a dependent on your parent's return, check here and see page 11 of the instructions. Also see page 11 of the instructions. • You are a taxpayer with a separate return and your spouse, partner, or child is on your return. • You are a taxpayer with a dependent. • You are a taxpayer with a dependent.	33	4988
34	Subtract line 33 from line 32. Use the amount on line 34 to find your tax from the Tax Tables, or to figure your tax on Schedule TC, Part I. Use Schedule TC, Part I, and the Tax Rate Schedules ONLY if: • Line 34 is more than \$20,000 (\$40,000 if you checked Filing Status Box 2 or 5), OR • You have more exemptions than are shown in the Tax Table for your filing status, OR • You use Schedule G or Form 4726 to figure your tax. Otherwise, you MUST use the Tax Tables to find your tax.	34	18012
35	Tax. Enter tax here and check if from <input checked="" type="checkbox"/> Tax Tables or <input type="checkbox"/> Schedule TC	35	1850
36	Additional taxes. (See page 12 of Instructions.) Enter here and check if from <input type="checkbox"/> Form 4970, <input type="checkbox"/> Form 4972, <input type="checkbox"/> Form 5544, <input type="checkbox"/> Form 5405, or <input type="checkbox"/> Section 72(m)(5) penalty tax	36	
37	Total. Add lines 35 and 36	37	1850

Credits

(See instructions on page 12)

38	Credit for contributions to candidates for public office	38	
39	Credit for the elderly (attach Schedules R&RP)	39	
40	Credit for child and dependent care expenses (attach Form 2441)	40	140
41	Investment credit (attach Form 3468)	41	
42	Foreign tax credit (attach Form 1116)	42	
43	Work incentive (WIN) credit (attach Form 4874)	43	
44	Jobs credit (attach Form 5884)	44	
45	Residential energy credits (attach Form 5695)	45	
46	Total credits. Add lines 38 through 45	46	140
47	Balance. Subtract line 46 from line 37 and enter difference (but not less than zero)	47	1710

Other Taxes

(Including Advance EIC Payments)

48	Self-employment tax (attach Schedule SE)	48	
49a	Minimum tax. Attach Form 4625 and check here	49a	
49b	Alternative minimum tax. Attach Form 6251 and check here	49b	
50	Tax from recomputing prior-year investment credit (attach Form 4255)	50	
51a	Social security (FICA) tax on tip income not reported to employer (attach Form 4137)	51a	
51b	Uncollected employee FICA and RRTA tax on tips (from Form W-2)	51b	
52	Tax on an IRA (attach Form 5329)	52	
53	Advance earned income credit (EIC) payments received (from Form W-2)	53	
54	Balance. Add lines 47 through 53	54	1710

Payments

Attach Forms W-2, W-2G, and W-2P to front.

55	Total Federal income tax withheld	55	3982
56	1980 estimated tax payments and amount applied from 1979 return	56	
57	Earned income credit. If line 32 is under \$10,000, see pages 13 and 14 of Instructions	57	
58	Amount paid with Form 4868	58	
59	Excess FICA and RRTA tax withheld (two or more employers)	59	
60	Credit for Federal tax on special fuels and oils (attach Form 4136 or 4136-T)	60	
61	Regulated Investment Company credit (attach Form 2439)	61	
62	Total. Add lines 55 through 61	62	3982

Refund or Balance Due

63	If line 62 is larger than line 54, enter amount OVERPAID	63	2272
64	Amount of line 63 to be REFUNDED TO YOU	64	2272
65	Amount of line 63 to be applied to your 1981 estimated tax	65	
66	If line 54 is larger than line 62, enter BALANCE DUE. Attach check or money order for full amount payable to "Internal Revenue Service." Write your social security number on check or money order. Check <input type="checkbox"/> if Form 2210 (2210F) is attached. (See page 15 of Instructions.)	66	

Please Sign Here

Under penalties of perjury, I declare that I have examined this return, including accompanying schedules and statements, and to the best of my knowledge and belief, it is true, correct, and complete. Declaration of preparer (other than taxpayer) is based on all information of which preparer has any knowledge.

Your signature: _____ Date: _____ Spouse's signature (if filing jointly. Both must sign even if only one had income)

Paid Preparer's Use Only

Preparer's signature and date: Frieda W. Schroeder
 Preparer's name (or yours, if self-employed) and address: 3926 S. 275th Place, Auburn, WA
 Check if self-employed:
 Preparer's social security no.: 52436 0468
 E.I.C. no.: _____
 ZIP code: 98002

Schedules A&B—Itemized Deductions AND Interest and Dividend Income

(Form 1040)
Department of the Treasury
Internal Revenue Service

▶ Attach to Form 1040. ▶ See Instructions for Schedules A and B (Form 1040).

1980

08

Name(s) as shown on Form 1040

Grant B. & Dolores A. Chabat

Your social security number

534563748

Schedule A—Itemized Deductions (Schedule B is on back)

Medical and Dental Expenses (not paid or reimbursed by insurance or otherwise) (See page 16 of Instructions.)		Contributions (See page 17 of Instructions.)	
1 One-half (but not more than \$150) of insurance premiums you paid for medical care. (Be sure to include in line 10 below.) ▶	<i>66</i>	21 a Cash contributions for which you have receipts or cancelled checks	<i>1587</i>
2 Medicine and drugs		b Other cash contributions (show to whom you gave and how much you gave) ▶ <i>Community Chapel</i>	<i>100</i>
3 Enter 1% of Form 1040, line 31		22 Other than cash (see page 17 of Instructions for required statement)	
4 Subtract line 3 from line 2. If line 3 is more than line 2, enter zero	<i>0</i>	23 Carryover from prior years	
5 Balance of insurance premiums for medical care not entered on line 1		24 Total contributions (add lines 21a through 23). Enter here and on line 36	<i>1687</i>
6 Other medical and dental expenses:		Casualty or Theft Loss(es) (See page 18 of Instructions.)	
a Doctors, dentists, nurses, etc.		25 Loss before insurance reimbursement	
b Hospitals		26 Insurance reimbursement	
c Other (itemize—include hearing aids, dentures, eyeglasses, transportation, etc.) ▶		27 Subtract line 26 from line 25. If line 26 is more than line 25, enter zero	
7 Total (add lines 4 through 6c)		28 Enter \$100 or amount from line 27, whichever is smaller	
8 Enter 3% of Form 1040, line 31		29 Total casualty or theft loss(es) (subtract line 28 from line 27). Enter here and on line 37	
9 Subtract line 8 from line 7. If line 8 is more than line 7, enter zero	<i>0</i>	Miscellaneous Deductions (See page 18 of Instructions.)	
10 Total medical and dental expenses (add lines 1 and 9). Enter here and on line 33	<i>66</i>	30 Union dues . (2)	<i>332</i>
Taxes (See page 17 of Instructions.)		31 Other (itemize) ▶	
Note: Gasoline taxes are no longer deductible.		<i>Tax Prep</i>	<i>30</i>
11 State and local income		<i>Safety Shoes</i>	<i>35</i>
12 Real estate	<i>242</i>	32 Total miscellaneous deductions (add lines 30 and 31). Enter here and on line 38 ▶	<i>397</i>
13 General sales (see sales tax tables)	<i>277</i>	Summary of Itemized Deductions	
14 Personal property		(See page 19 of Instructions.)	
15 Other (itemize) ▶		33 Total medical and dental—from line 10	<i>66</i>
16 Total taxes (add lines 11 through 15). Enter here and on line 34	<i>519</i>	34 Total taxes—from line 16	<i>519</i>
Interest Expense (See page 17 of Instructions.)		35 Total interest—from line 20	<i>5719</i>
17 Home mortgage	<i>5404</i>	36 Total contributions—from line 24	<i>1687</i>
18 Credit and charge cards	<i>87</i>	37 Total casualty or theft loss(es)—from line 29	<i>0</i>
19 Other (itemize) ▶		38 Total miscellaneous—from line 32	<i>397</i>
<i>Fishers Island CU</i>	<i>4</i>	39 Add lines 33 through 38	<i>8388</i>
<i>Seattle First Peoples</i>	<i>215</i>	40 If you checked Form 1040, Filing Status box:	
	<i>9</i>	2 or 5, enter \$3,400	<i>3400</i>
		1 or 4, enter \$2,300	
		3, enter \$1,700	
20 Total interest expense (add lines 17 through 19). Enter here and on line 35 ▶	<i>5719</i>	41 Subtract line 40 from line 39. Enter here and on Form 1040, line 33. (If line 40 is more than line 39, see the instructions for line 41 on page 19.)	<i>4988</i>

▶ Attach to Form 1040.

▶ See Instructions below.

Information shown on Form 1040:

Grant B & Dolores A Chabot

Your social security number
594 563748

1 See the definition for "qualifying person" in the instructions. Then read the instructions for line 1.

(d) During 1980, the person lived with you for:

(a) Name of qualifying person	(b) Date of birth	(c) Relationship	Months	Days
Sharna Chabot	1-14-75	Daughter	12	
Michael Chabot	2-4-76	Son	12	

2 Enter the organizations who cared for those listed on line 1. See the instructions for line 2.

(a) Name and address (if more space is needed, attach schedule)	(b) Social security number, if applicable	(c) Relationship, if any	(d) Period of care		(e) Amount of 1980 expenses (include those not paid during the year)
			From Month—Day	To Month—Day	
Community Chapel & Bible Training Center 186 95 8th Ave S Seattle, WA 98148	N/A	None	Jan Sept	June Dec	700

To figure your credit, you MUST complete ALL lines that apply

3 Add the amounts in column 2(e)	3	700
4 Enter \$2,000 (\$1,000 if you listed two or more names in line 1) or amount on line 3, whichever is less	4	700
5 Earned income (wages, salaries, tips, etc.). See the instructions for line 5. An entry MUST be made on this line.		
(a) If unmarried at end of 1980, enter your earned income	▶ 5	2080
(b) If married at end of 1980, enter your earned income or your spouse's, whichever is less		
6 Enter the amount on line 4 or line 5, whichever is less	6	700
7 Amount on line 6 paid during 1980. An entry MUST be made on this line	▶ 7	700
8 Child and dependent child care expenses for 1979 paid in 1980. See instructions for line 8	8	0
9 Add amounts on lines 7 and 8	9	700
10 Multiply line 9 by 20 percent	10	140
11 Limitation:		
a Enter tax from Form 1040, line 37	11a	1850
b Enter total of lines 38, 39, and 41 through 43 of Form 1040	11b	
c Subtract line 11b from line 11a (if line 11b is more than line 11a, enter zero)	11c	1850
12 Credit for child and dependent care expenses. Enter the smaller of line 10 or line 11c here and on Form 1040, line 40	12	140
13 If payments listed on line 2 were made to an individual, complete the following:		
(a) If you paid \$50 or more in a calendar quarter to an individual, were the services performed in your home?	Yes	No
(b) If "Yes," have you filed appropriate wage tax returns on wages for services in your home (see instructions for line 13)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(c) If answer to (b) is "Yes," enter your employer identification number		

General Instructions

If you or your spouse worked or looked for work, and you spent money to care for a qualifying person (see below), this form might save you tax.

What is the Child and Dependent Care Expenses Credit?—This is a credit you can take against your tax if you paid someone to care for your child or dependent so that you could work or look for work. You can also take the credit if you paid someone to care for a spouse. The instructions that follow list tests that must be met to take the credit. If you need more information, see Publication 503, Child and Dependent Care.

For purposes of this credit, we have defined some of the terms used here. Refer to these when you read the instructions.

Definitions

A qualifying person can be:

- Any person under age 15 when you list as a dependent, if you are divorced or legally separated, or separated under a

written agreement, please see the Child Custody Test in the instructions.)

- Your spouse who is mentally or physically not able to care for himself or herself.
- Any person not able to care for himself or herself whom you can list as a dependent, or could list as a dependent except that he or she had income of \$1,000 or more.

A relative is your child, stepchild, mother, father, grandparent, brother, sister, grand-uncle, uncle, nephew, niece, stepmother, stepfather, stepbrother, step-sister, mother-in-law, father-in-law, brother-in-law, sister-in-law, son-in-law, and daughter-in-law. A cousin is not a relative for purpose of this credit.

A full-time student is one who was enrolled in a school for the number of hours or classes that is considered full time. The student must have been enrolled at least 5 months during 1980.

What Are Child and Dependent Care Expenses?

These expenses are the amounts you

paid for household services and care of the qualifying person.

Household Services.—These are services performed by a cook, housekeeper, governess, maid, cleaning person, babysitter, etc. The services must have been needed to care for the qualifying person as well as run the home. For example, if you paid for the services of a maid or a cook, the services must have also been for the benefit of the qualifying person.

Care of the Qualifying Person.—Care includes cost of services for the well-being and protection of the qualifying person.

Care does not include expenses for food and clothes. If you paid for care that included these items and you cannot separate their cost, take the total payment.

Example: You paid a nursery school to care for your child and the school gave the child lunch. Since you cannot separate the cost of the lunch from the cost of the care, you can take all of the amount that you paid to the school.

This example would not apply if you had school costs for a child in the first grade or

1 Control number		OMB No. 1545-0008				
2 Employer's name, address, and ZIP code W.F. Hall Co. 2105 S. Grand St. Seattle, WA 98144			3 Employer's identification number 91-0713285		4 Employer's State number 234421-00	
			5 Stat. em- ployee	De- ceased	Legal rep.	942 emp.
8 Employee's social security number 534-56-3748			9 Federal income tax withheld 190.40		6 Allocated tips	7 Advance EIC payment
12 Employee's name, address, and ZIP code Grant Brian Chabot 1230 S. 211 St. Seattle, WA 98148			10 Wages, tips, other compensation 3,525.00		11 Social security tax withheld 236.18	
			13 Social security wages 3,525.00		14 Social security tips	
16			17 State income tax	18 State wages, tips, etc.	19 Name of State	
20 Local income tax			21 Local wages, tips, etc.	22 Name of locality		

Form **W-2 Wage and Tax Statement 1983**

Copy C For employee's records
This information is being furnished to the Internal Revenue Service.

Department of the Treasury
Internal Revenue Service

1 Control number		OMB No. 1545-0008				
2 Employer's name, address, and ZIP code L. Best Construction P.O. Box 46069 Seattle, WA 98126			3 Employer's identification number 91-1139688		4 Employer's State number	
			5 Stat. em- ployee	De- ceased	Legal rep.	942 emp.
8 Employee's social security number 534-56-3748			9 Federal income tax withheld 28.70		6 Allocated tips	7 Advance EIC payment
12 Employee's name, address and ZIP code Chabot, Grant B. 1230 S. 211th St. Seattle, WA 98148			10 Wages, tips, other compensation 272.50		11 Social security tax withheld 18.26	
			13 Social security wages 222.50		14 Social security tips	
16			17 State income tax	18 State wages, tips, etc.	19 Name of State	
20 Local income tax			21 Local wages, tips, etc.	22 Name of locality		

Form **W-2 Wage and Tax Statement 1983**

Copy C For employee's records
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Department of the Treasury
Internal Revenue Service

1 Control number		OMB No. 1545-0008				
2 Employer's name, address, and ZIP code Dochnahl Construction, Inc. 13020 Lk. Kathleen Rd. S.E. Renton, WA 98056			3 Employer's identification number 91-0968640		4 Employer's State number	
			5 Stat. em- De- ployee ceased <input type="checkbox"/> <input type="checkbox"/>		Legal rep. <input type="checkbox"/>	
			942 emp. <input type="checkbox"/>		Sub-total <input type="checkbox"/>	
			Void <input type="checkbox"/>			
8 Employee's social security number 534 56 3748			9 Federal income tax withheld 550.20		6 Allocated tips	
12 Employee's name, address, and ZIP code Grant B. Chabot 1230 So. 211st Seattle, WA 98148			10 Wages, tips, other compensation 5834.00		7 Advance EIC payment	
			11 Social security tax withheld 390.84			
			13 Social security wages 5834.00		14 Social security tips	
			16 Insurance Prem: 154.35			

Form **W-2 Wage and Tax Statement 1983**

Copy C For employee's records
This information is being furnished to the Internal Revenue Service.

Department of the Treasury
Internal Revenue Service

1 Control number		OMB No. 1545-0008				
2 Employer's name, address, and ZIP code L. Best Construction P.O. Box 46069 Seattle, Washington 98126			3 Employer's identification number 91-1139688		4 Employer's State number	
			5 Stat. em- De- ployee ceased <input type="checkbox"/> <input type="checkbox"/>		Legal rep. <input type="checkbox"/>	
			942 emp. <input type="checkbox"/>		Sub-total <input type="checkbox"/>	
			Void <input type="checkbox"/>			
8 Employee's social security number 534-56-3748			9 Federal income tax withheld 160.30		6 Allocated tips	
12 Employee's name, address, and ZIP code Chabot, Grant B. 1230 South 211st Seattle, WA 98148			10 Wages, tips, other compensation 1572.00		7 Advance EIC payment	
			11 Social security tax withheld 105.34			
			13 Social security wages 1572.00		14 Social security tips	
			16 L&I 30.67			

Form **W-2 Wage and Tax Statement 1983**

Copy C For employee's records
This information is being furnished to the Internal Revenue Service.

Department of the Treasury
Internal Revenue Service

1 Control number		OMB No. 1545-0008			
2 Employer's name, address, and ZIP code			3 Employer's identification number		4 Employer's State number
Atlas Applicators Co., Inc. 625 So. Alaska St. Seattle, WA. 98108			91-0752411		
8 Employee's social security number			9 Federal income tax withheld	5 Stat. em- De- ployee ceased	
534-56-3748			69.90	Legal rep.	942 emp.
12 Employee's name, address, and ZIP code			6 Allocated tips		Sub-total
Grant B. Chabot 1230 So. 211th St. Seattle, WA. 98148					Void
			7 Advance EIC payment		
			10 Wages, tips, other compensation		11 Social security tax withheld
			725.38		48.60
			13 Social security wages		14 Social security tips
			16		

Form **W-2 Wage and Tax Statement 1983**

Copy C For employee's records
This information is being furnished to the Internal Revenue Service.

Department of the Treasury
Internal Revenue Service

TAXPAYER COPY

Form 1040 U.S. Individual Income Tax Return 1983

For the year January 1-December 31, 1983, or other tax year beginning 1983, ending 19 OMB No. 1545-0074

Use IRS label. Other-wise, please print or type. Your first name and initial (if joint return, also give spouse's name and initial) Last name Your social security number GRANT B & DELORES A CHABOT 534 56 3748 Present home address (Number and street, including apartment number, or rural route) Spouse's social security number 1230 S 211TH ST 537 50 5286 City, town or post office, State, and ZIP code SEATTLE WA 98148 Your occupation WAREHOUSE - DRYWALL Spouse's occupation

Presidential Election Campaign Do you want \$1 to go to this fund? If joint return, does your spouse want \$1 to go to this fund? Yes No Yes No Note: Checking "Yes" will not increase your tax or reduce your refund.

Filing Status 1 Single For Privacy Act and Paperwork Reduction Act Notice, see Instructions. 2 Married filing joint return (even if only one had income) 3 Married filing separate return. Enter spouse's social security no. above and full name here. 4 Head of household (with qualifying person). (See page 6 of Instructions.) If the qualifying person is your unmarried child but not your dependent, write child's name here. 5 Qualifying widow(er) with dependent child (Year spouse died > 19). (See page 6 of Instructions.)

Exemptions 6a Yourself 65 or over Blind Enter number of boxes checked on 6a and b 2 6b Spouse 65 or over Blind Enter number of children listed on 6c 3 c First names of your dependent children who lived with you SHAWNA - MICHAEL - NICOLAS d Other dependents: (1) Name (2) Relationship (3) Number of months lived in your home (4) Did dependent have income of \$1,000 or more? (5) Did you provide more than one-half of dependent's support? Enter number of other dependents Add numbers entered in boxes above 5

Income 7 Wages, salaries, tips, etc. 7 11928 88 8 Interest income (also attach Schedule B if over \$400 or you have any All-Savers interest) 8 102 9a Dividends (also attach Schedule B if over \$400) 9b Exclusion 9c Subtract line 9b from line 9a and enter the result 10 Refunds of State and local income taxes, from worksheet on page 10 of Instructions (do not enter an amount unless you deducted those taxes in an earlier year—see page 10 of Instructions) 10 11 Alimony received 11 12 Business income or (loss) (attach Schedule C) 12 358 33 13 Capital gain or (loss) (attach Schedule D) 13 14 40% capital gain distributions not reported on line 13 (See page 10 of Instructions) 14 15 Supplemental gains or (losses) (attach Form 4797) 15 16 Fully taxable pensions, IRA distributions, and annuities not reported on line 17. 16 17a Other pensions and annuities, including rollovers. Total received 17a 211 00 17b Taxable amount, if any, from worksheet on page 10 of Instructions 17b 18 Rents, royalties, partnerships, estates, trusts, etc. (attach Schedule E) 18 19 Farm income or (loss) (attach Schedule F) 19 20a Unemployment compensation (insurance). Total received 20a 20b Taxable amount, if any, from worksheet on page 11 of Instructions 20b 21 Other income (state nature and source—see page 11 of Instructions) 21 22 Total income. Add amounts in column for lines 7 through 21 22 12288 23

Adjustments to Income (See Instructions on page 11) 23 Moving expense (attach Form 3903 or 3903F) 23 24 Employee business expenses (attach Form 2106) 24 25a IRA deduction, from the worksheet on page 12 25a 25b Enter here IRA payments you made in 1984 that are included in line 25a above 26 Payments to a Keogh (H.R. 10) retirement plan 26 27 Penalty on early withdrawal of savings 27 28 Alimony paid 28 29 Deduction for a married couple when both work (attach Schedule W) 29 30 Disability income exclusion (attach Form 2440) 30 31 Total adjustments. Add lines 23 through 30 31

Adjusted Gross Income 32 Adjusted gross income. Subtract line 31 from line 22. If this line is less than \$10,000, see "Earned Income Credit" (line 59) on page 16 of Instructions. If you want IRS to figure your tax, see page 3 of Instructions 32 12288 23

Tax Computation

(See instructions on page 13)

33	Amount from line 32 (adjusted gross income)	33	12288	23
34a	If you itemize, complete Schedule A (Form 1040) and enter the amount from Schedule A, line 28	34a	3573	94
<p>Caution: If you have unearned income and can be claimed as a dependent on your parent's return, check here <input type="checkbox"/> and see page 13 of the instructions. Also see page 13 of the instructions if:</p> <ul style="list-style-type: none"> You are married filing a separate return and your spouse itemizes deductions, OR You file Form 4563, OR You are a dual-status alien. 				
34b	If you do not itemize deductions on Schedule A (Form 1040), complete the worksheet on page 14. Then enter the allowable part of your charitable contributions here	34b		
35	Subtract line 34a or 34b, whichever applies, from line 33	35	8714	29
36	Multiply \$1,000 by the total number of exemptions claimed on Form 1040, line 6e	36	5000	00
37	Taxable Income. Subtract line 36 from line 35	37	3714	29
38	Tax. Enter tax here and check if from <input checked="" type="checkbox"/> Tax Table, <input type="checkbox"/> Tax Rate Schedule X, Y, or Z, or <input type="checkbox"/> Schedule G	38	36	00
39	Additional Taxes. (See page 14 of instructions.) Enter here and check if from <input type="checkbox"/> Form 4970, <input type="checkbox"/> Form 4972, <input type="checkbox"/> Form 5544, or <input type="checkbox"/> section 72 penalty taxes	39		
40	Total. Add lines 38 and 39	40	36	00

Credits

(See instructions on page 14)

41	Credit for the elderly (attach Schedules R&RP)	41		
42	Foreign tax credit (attach Form 1116)	42		
43	Investment credit (attach Form 3468)	43	36	00
44	Partial credit for political contributions	44		
45	Credit for child and dependent care expenses (attach Form 2441)	45		
46	Jobs credit (attach Form 5884)	46		
47	Residential energy credit (attach Form 5695)	47		
48	Total credits. Add lines 41 through 47	48	36	00

Other Taxes

(Including Advance EIC Payments)

49	Balance. Subtract line 48 from line 40 and enter difference (but not less than zero)	49		
50	Self-employment tax (attach Schedule SE)	50		
51	Alternative minimum tax (attach Form 6251)	51		
52	Tax from recapture of investment credit (attach Form 4255)	52		
53	Social security tax on tip income not reported to employer (attach Form 4137)	53		
54	Uncollected employee social security tax and RRTA tax on tips (from Form W-2)	54		
55	Tax on an IRA (attach Form 5329)	55		

06 Payments

Attach Forms W-2, W-2G, and W-2P to front.

56	Total tax. Add lines 49 through 55	56		
57	Federal income tax withheld	57	999	50
58	1983 estimated tax payments and amount applied from 1982 return	58		
59	Earned income credit. If line 33 is under \$10,000, see page 16	59		
60	Amount paid with Form 4868	60		
61	Excess social security tax and RRTA tax withheld (two or more employers)	61		
62	Credit for Federal tax on special fuels and oils (attach Form 4136)	62		
63	Regulated Investment Company credit (attach Form 2439)	63		

Refund or Amount You Owe

64	Total payments. Add lines 57 through 63	64	999	50
65	If line 64 is larger than line 56, enter amount OVERPAID	65	999	50
66	Amount of line 65 to be REFUNDED TO YOU	66	999	50
67	Amount of line 65 to be applied to your 1984 estimated tax	67		
68	If line 56 is larger than line 64, enter AMOUNT YOU OWE. Attach check or money order for full amount payable to "Internal Revenue Service." Write your social security number and "1983 Form 1040" on it (Check <input type="checkbox"/> if Form 2210 (2210F) is attached. See page 17 of instructions.) \$	68		

Please Sign Here

Under penalties of perjury, I declare that I have examined this return and accompanying schedules and statements, and to the best of my knowledge and belief, they are true, correct, and complete. Declaration of preparer (other than taxpayer) is based on all information of which preparer has any knowledge.

Your signature _____ Date _____ Spouse's signature (if filing jointly, BOTH must sign) _____

Paid Preparer's Use Only

Preparer's signature: Lorraine J. Golden Date: 1/31/84 Check if self-employed Preparer's social security no. 483 52 9577

Firm's name (or yours, if self-employed) and address: P.O. BOX 4888 E.I. No. 91 09 76666

1411 S.W. DASH ST. RD. ZIP code 97003

FEDERAL WAY, WA 98003

**SCHEDULE C
(Form 1040)**

**Profit or (Loss) From Business or Profession
(Sole Proprietorship)**

OMB No. 1545-0074

1983
09

Department of the Treasury
Internal Revenue Service (0)

Partnerships, Joint Ventures, etc., Must File Form 1065.
▶ Attach to Form 1040 or Form 1041. ▶ See instructions for Schedule C (Form 1040).

Name of proprietor: GRANT B CHABOT Social security number of proprietor: 534 56 3748

A Main business activity (see instructions) ▶ DRYWALL ; product ▶

B Business name and address ▶ 1230 S 211TH ST SEATTLE C Employer identification number

D Method(s) used to value closing inventory:
(1) Cost (2) Lower of cost or market (3) Other (attach explanation)

E Accounting method: (1) Cash (2) Accrual (3) Other (specify) ▶

F Was there any major change in determining quantities, costs, or valuations between opening and closing inventory?
If "Yes," attach explanation. Yes No X

G Did you deduct expenses for an office in your home?

PART I.—Income

1 a Gross receipts or sales	1a	1548	00
b Less: Returns and allowances	1b		
c Subtract line 1b from line 1a and enter the balance here	1c	1548	00
2 Cost of goods sold and/or operations (Part III, line 8)	2		
3 Subtract line 2 from line 1c and enter the gross profit here	3	1548	00
4 a Windfall Profit Tax Credit or Refund received in 1983 (see instructions)	4a		
b Other income	4b		
5 Add lines 3, 4a, and 4b. This is the gross income	5	1548	00

PART II.—Deductions

6 Advertising			
7 Bad debts from sales or services (Cash method taxpayers, see instructions)			
8 Bank service charges			
9 Car and truck expenses	304	20	
10 Commissions			
11 Depletion			
12 Depreciation and Section 179 deduction from Form 4562 (not included in Part III)	585	61	
13 Dues and publications			
14 Employee benefit programs			
15 Freight (not included in Part III)			
16 Insurance	200	96	
17 Interest on business indebtedness			
18 Laundry and cleaning			
19 Legal and professional services			
20 Office expense			
21 Pension and profit-sharing plans			
22 Rent on business property			
23 Repairs			
24 Supplies (not included in Part III)			24
25 Taxes (Do not include Windfall Profit Tax here. See line 29.)			04
26 Travel and entertainment			
27 Utilities and telephone			23
28 a Wages			84
b Jobs credit			
c Subtract line 28b from 28a			
29 Windfall Profit Tax withheld in 1983			
30 Other expenses (specify):			
a			
b Small Tools			51
c			00
d			
e			
f			
g			
h			
i			
31 Add amounts in columns for lines 6 through 30i. These are the total deductions	31	1189	67
32 Net profit or (loss). Subtract line 31 from line 5 and enter the result. If a profit, enter on Form 1040, line 12, and on Schedule SE, Part I, line 2 (or Form 1041, line 6). If a loss, go on to line 33	32	358	33

33 If you have a loss, you must answer this question: "Do you have amounts for which you are not at risk in this business (see instructions)?" Yes No
If "Yes," you must attach Form 6198. If "No," enter the loss on Form 1040, line 12, and on Schedule SE, Part I, line 2 (or Form 1041, line 6).

PART III.—Cost of Goods Sold and/or Operations (See Schedule C Instructions for Part III)

1 Inventory at beginning of year (if different from last year's closing inventory, attach explanation)	1		
2 Purchases less cost of items withdrawn for personal use	2		
3 Cost of labor (do not include salary paid to yourself)	3		
4 Materials and supplies	4		
5 Other costs	5		
6 Add lines 1 through 5	6		
7 Less: Inventory at end of year	7		
8 Cost of goods sold and/or operations. Subtract line 7 from line 6. Enter here and in Part I, line 2, above.	8		

Computation of Investment Credit

▶ Attach to your tax return.
 ▶ Schedule B (Business Energy Investment Credit) on back.

Name(s) as shown on return: **GRANT B + DELORES A CHABOT** Identifying number: **534-56-3748**

- PART I.—Elections**
- A The corporation elects the basic or basic and matching employee plan percentage under section 48(n)(1)
 - B I elect to increase my qualified investment to 100% for certain commuter highway vehicles under section 46(c)(6)
 - C I elect to increase my qualified investment by all qualified progress expenditures made this and all later tax years
- Enter total qualified progress expenditures included in column (4), Part II ▶
- D I claim full credit on certain ships under section 46(g)(3) (See Instruction B for details.)

1 Recovery Property		Line	(1) Class of Property	(2) Unadjusted Basis	(3) Applicable Percentage	(4) Qualified Investment (Column 2 x column 3)
Regular Percentage	New Property	(a)	3-year		60	
	Used Property	(b)	Other		100	
	New Property	(c)	3-year	2342.44	60	1405.46
	Used Property	(d)	Other		100	
§48(q) Election to Reduce Credit (instead of adjusting basis) FY 1982-83 filers only (see instr.)	New Property	(e)	3-year		40	
	Used Property	(f)	Other		80	
	New Property	(g)	3-year		40	
	Used Property	(h)	Other		80	

PART II.—Qualified Investment

2 Nonrecovery property—Enter total qualified investment (See instructions for line 2)	2	
3 New commuter highway vehicle—Enter total qualified investment (See Instruction D(2))	3	
4 Used commuter highway vehicle—Enter total qualified investment (See Instruction D(2))	4	
5 Total qualified investment in 10% property—Add lines 1(a) through 1(h), 2, 3, and 4 (See instructions for special limits)	5	1405.46
6 Qualified rehabilitation expenditures—Enter total qualified investment for:		
a 30-year-old buildings	6a	
b 40-year-old buildings	6b	
c Certified historic structures (Enter the Dept. of Interior assigned project number)	6c	
7 Corporations checking election box A above—add lines 5, 6a, 6b, and 6c	7	

PART III.—Tentative Regular Investment Credit

8 10% of line 5	8	112.44
9 15% of line 6a	9	
10 20% of line 6b	10	
11 25% of line 6c	11	
12 Corporations checking election box A (See Instruction D(1))—		
a Basic 1% credit—Enter 1% of line 7 (1982-83 fiscal-year filers, see instructions for line 12)	12a	
b Matching credit (not more than 0.5%)—Allowable percentage times adjusted line 7 (attach schedule)	12b	
13 Credit from cooperative—Enter regular investment credit from cooperatives	13	
14 Current year regular investment credit—Add lines 8 through 13	14	112.44
15 Carryover of unused credits <i>71% ELECTS TO CARRY FORWARD, UNUSED CREDIT</i>	15	
16 Carryback of unused credits	16	
17 Tentative regular investment credit—Add lines 14, 15, and 16	17	112.44

PART IV.—Tax Liability Limitations

18 a Individuals—From Form 1040, enter tax from line 38, page 2, plus any additional taxes from Form 4970 b Estates and trusts—From Form 1041, enter tax from line 26a, plus any section 644 tax on trusts c Corporations (1120 filers)—From Form 1120, Schedule J, enter tax from line 3 d Other organizations—Enter tax before credits from return	18	36.00
19 a Individuals—From Form 1040, enter credits from lines 41 and 42 of page 2 b Estates and trusts—From Form 1041, enter any foreign tax credit from line 27a c Corporations (1120 filers)—From Form 1120, Schedule J, enter any foreign tax credit from line 4(a), plus any possessions tax credit from line 4(f) d Other organizations—Enter any foreign or possessions tax credit	19	
20 Income tax liability as adjusted (subtract line 19 from line 18)	20	36.00
21 a Enter smaller of line 20 or \$25,000. See instruction for line 21	21a	36.00
b If line 20 is more than \$25,000—Enter 90% of the excess	21b	
22 Regular investment credit limitation—Add lines 21a and 21b	22	36.00
23 Allowed regular investment credit—Enter the smaller of line 17 or line 22	23	36.00
24 Business energy investment credit limitation—Subtract line 23 from line 20	24	
25 Business energy investment credit—From line 14 of Schedule B (Form 3468)	25	
26 Allowed business energy investment credit—Enter smaller of line 24 or line 25	26	
27 Total allowed regular and business energy investment credit—Add lines 23 and 26. Enter here and on Form 1040, line 43; Schedule J (Form 1120), line 4(b), page 3; or the proper line on other returns	27	36.00

... + 10 ELECTS TO CARRY FORWARD 71.44 AS ...

Depreciation and Amortization

1983
67

Department of the Treasury
Internal Revenue Service (01)

▶ See separate instructions.
▶ Attach this form to your return.

Name(s) as shown on return
GRANT B & DELORES A CHASOT

Identifying number
534-56-3748

Business or activity to which this form relates
Schedule C

PART I.—Depreciation

Section A.—Election to expense recovery property (Section 179)

A. Class of property	B. Cost	C. Expense deduction

1 Total (not more than \$5,000). Enter here and on page 2, line 8 (Partnerships or S corporations—see the Schedule K and Schedule K-1 Instructions of Form 1065 or 1120S)

Section B.—Depreciation of recovery property

A. Class of property	B. Date placed in service	C. Cost or other basis	D. Recovery period	E. Method of figuring depreciation	F. Percentage	G. Deduction for this year
2 Accelerated Cost Recovery System (ACRS) (See instructions):						
<i>78.5% FOR BUS COST 2984.00</i>	<i>1983</i>	<i>2342.44</i>	<i>3YR</i>	<i>ACRS</i>	<i>25%</i>	<i>585.61</i>
(a) 3-year property						
(b) 5-year property						
(c) 10-year property						
(d) 15-year public utility property						
(e) 15-year real property—low-income housing						
(f) 15-year real property other than low-income housing						
3 Property subject to section 168(e)(2) election (See instructions):						

4 Total column G. Enter here and on page 2, line 9

585.61

**SCHEDULE SE
(Form 1040)**

Computation of Social Security Self-Employment Tax

OMB No. 1545-0074

Department of the Treasury
Internal Revenue Service (0)

▶ See Instructions for Schedule SE (Form 1040).
▶ Attach to Form 1040.

1983
19

Name of self-employed person (as shown on social security card) <i>GRANT B CHABOT</i>	Social security number of self-employed person ▶ <i>534 56 3748</i>
--	---

PART I.—Regular Computation of Net Earnings from Self-Employment

1 Net profit or (loss) from Schedule F (Form 1040), line 56 or line 89, and farm partnerships, Schedule K-1 (Form 1065), line 18b	1		
2 Net profit or (loss) from Schedule C (Form 1040), line 32, and Schedule K-1 (Form 1065), line 18b (other than farming). See instructions for kinds of income to report. Note: If you are exempt from self-employment tax on your earnings as a minister, member of a religious order, or Christian Science practitioner because you filed Form 4361, check here <input type="checkbox"/> . If you have other earnings of \$400 or more that are subject to self-employment tax, include those earnings on this line	2	<i>358</i>	<i>33</i>

PART II.—Optional Computation of Net Earnings from Self-Employment

Generally, this part may be used only if you meet any of the following tests:

- A Your gross farm profits (Schedule F (Form 1040), line 31 or line 87) were not more than \$2,400, or
- B Your gross farm profits (Schedule F (Form 1040), line 31 or line 87) were more than \$2,400 and your net farm profits (Schedule F (Form 1040), line 56 or line 89) were less than \$1,600, or
- C Your net nonfarm profits (Schedule C (Form 1040), line 32) were less than \$1,600 and also less than two-thirds (2/3) of your gross nonfarm income (Schedule C (Form 1040), line 5).

See instructions for other limitations.

3 Maximum income for optional methods	3	\$1,600	00
4 Farm Optional Method—If you meet test A or B above, enter: two-thirds (2/3) of gross profits from Schedule F (Form 1040), line 31 or line 87, and farm partnerships, Schedule K-1 (Form 1065), line 18a, or \$1,600, whichever is smaller	4		
5 Subtract line 4 from line 3	5		
6 Nonfarm Optional Method—If you meet test C, enter: the smaller of two-thirds (2/3) of gross nonfarm income from Schedule C (Form 1040), line 5, and Schedule K-1 (Form 1065), line 18c (other than farming), or \$1,600, or, if you elected the farm optional method, the amount on line 5	6		

PART III.—Computation of Social Security Self-Employment Tax

7 Enter the amount from Part I, line 1, or, if you elected the farm optional method, Part II, line 4	7		
8 Enter the amount from Part I, line 2, or, if you elected the nonfarm optional method, Part II, line 6	8	<i>358</i>	<i>33</i>
9 Add lines 7 and 8. If less than \$400, you are not subject to self-employment tax. Do not fill in the rest of the schedule	9	<i>358</i>	<i>33</i>
10 The largest amount of combined wages and self-employment earnings subject to social security or railroad retirement tax (Tier I) for 1983 is	10	\$35,700	00
11 a Total social security wages from Forms W-2 and railroad retirement compensation (Tier I). Note: U.S. Government employees whose wages are only subject to the 1.3% hospital benefits tax (Medicare) should not include those wages on this line (see instructions)	11a		
b Unreported tips subject to social security tax from Form 4137, line 9, or to railroad retirement tax (Tier I)	11b		
c Add lines 11a and 11b	11c		
12 Subtract line 11c from line 10	12		
13 Enter the smaller of line 9 or line 12 If line 13 is \$35,700 or more, fill in \$3,337.95 on line 14. Otherwise, multiply line 13 by .0935 and enter the result on line 14	13		
14 Self-employment tax. Enter this amount on Form 1040, line 50	14		

For Paperwork Reduction Act Notice, see Form 1040 Instructions.

Schedule SE (Form 1040) 1983

1 Control number		OMB No. 1545-0008						
2 Employer's name, address, and ZIP code Wall Systems, Inc. 12704 124th St. N. E. #46 Kirkland, Wa. 98033			3 Employer's identification number 911133409		4 Employer's State number			
			5 Stat. em- ployee	De- ceased	Legal rep.	942 emp.	Sub- total	Void
8 Employee's social security number 534 56 3748			9 Federal income tax withheld 112.80		10 Wages, tips, other compensation 962.00	11 Social security tax withheld 64.45		
12 Employee's name, address and ZIP code Grant Brian Chabot 1230 S. 211st St. Seattle, Wa. 98148			13 Social security wages 962.00		14 Social security tips			
			16 SDI					
			17 State income tax		18 State wages, tips, etc. 962.00		19 Name of State Wa.	
			20 Local income tax		21 Local wages, tips, etc.		22 Name of locality	

Form **W-2 Wage and Tax Statement 1984**

Copy C For employee's records
This information is being furnished to the Internal Revenue Service.

Department of the Treasury
Internal Revenue Service

1 Control number		OMB No. 1545-0008						
2 Employer's name, address, and ZIP code Wall Systems, Inc. 12704 124th St. N. E. #46 Kirkland, Wa. 98033			3 Employer's identification number 911133409		4 Employer's State number			
			5 Stat. em- ployee	De- ceased	Legal rep.	942 emp.	Sub- total	Void
8 Employee's social security number 534 56 3748			9 Federal income tax withheld 112.80		10 Wages, tips, other compensation 962.00	11 Social security tax withheld 64.45		
12 Employee's name, address and ZIP code Grant Brian Chabot 1230 S. 211st St. Seattle, Wa. 98148			13 Social security wages 962.00		14 Social security tips			
			16 SDI					
			17 State income tax		18 State wages, tips, etc. 962.00		19 Name of State Wa.	
			20 Local income tax		21 Local wages, tips, etc.		22 Name of locality	

Wage and Tax Statement 1984

Copy 2 To be filed with employee's State, City, or Local income
tax return. Employee's and employer's copy compared

1 Control number		OMB No. 1545-0008					
2 Employer's name, address, and ZIP code L. Best Construction 13023 NE 70th Place Kirkland, WA 98033				3 Employer's identification number 91-1199688		4 Employer's State number	
				5 Stat. employee <input type="checkbox"/> Deceased <input type="checkbox"/> Legal rep. <input type="checkbox"/>		942 emp. <input type="checkbox"/> Subtotal <input type="checkbox"/> Void <input type="checkbox"/>	
				6 Allocated tips		7 Advance EIC payment	
8 Employee's social security number 534-56-3748		9 Federal income tax withheld 3.40		10 Wages, tips, other compensation 222.30		11 Social security tax withheld 14.91	
12 Employee's name, address, and ZIP code CHABOT, Grant Brian 1230 S. 221st Seattle, WA 98148				13 Social security wages 222.30		14 Social security tips	
				16			
				17 State income tax		18 State wages, tips, etc.	
				20 Local income tax		22 Name of locality	
				19 Name of State			
				21 Local wages, tips, etc.			

Form **W-2 Wage and Tax Statement 1984**

Copy C For employee's records

This information is being furnished to the Internal Revenue Service.

Department of the Treasury
Internal Revenue Service

1 Control number		OMB No. 1545-0008					
2 Employer's name, address, and ZIP code L. Best Construction 13023 NE 70th Place Kirkland, WA 98033				3 Employer's identification number 91-1199688		4 Employer's State number	
				5 Stat. employee <input type="checkbox"/> Deceased <input type="checkbox"/> Legal rep. <input type="checkbox"/>		942 emp. <input type="checkbox"/> Subtotal <input type="checkbox"/> Void <input type="checkbox"/>	
				6 Allocated tips		7 Advance EIC payment	
8 Employee's social security number 534-56-3748		9 Federal income tax withheld 3.40		10 Wages, tips, other compensation 222.50		11 Social security tax withheld 14.91	
12 Employee's name, address, and ZIP code CHABOT, Grant Brian 1230 S. 221st Seattle, WA 98148				13 Social security wages 222.50		14 Social security tips	
				16			
				17 State income tax		18 State wages, tips, etc.	
				20 Local income tax		22 Name of locality	
				19 Name of State			
				21 Local wages, tips, etc.			

Form **W-2 Wage and Tax Statement 1984**

Copy 1 For State, City, or Local Tax Department
Employee's and employer's copy compared

2000613		Control Number	Form W-2 Wage and Tax Statement 1984 OMB No. 1545-0008		Copy C For employee's records Department of the Treasury - Internal Revenue Service		
2 Employer's name, address, and ZIP code FEBEL & MC CANDLESS INC 040 215 BELL STREET EAS SEATTLE WA 98121 16944			3 Employer's identification number 91-1084653	4 Employer's State number			
8 Employee's social security number 534-56-3748			9 Federal income tax withheld 570.88	10 Wages, tips, other compensation 5440.00	11 Social security tax withheld 304.50		
12 Employee's name, address, and ZIP code GRANT B CHABOT 1230 S 211TH ST SEATTLE WA 98148			13 Social security wages 5440.00	14 Social security tips			
16 State unemp/dis w/h			17 State income tax	18 State wages, tips, etc.	19 Name of State WA		
20 Local income tax			21 Local wages, tips, etc.	22 Name of locality			
<small>The social security rate of 6.7% (after allowance of a 0.3% credit) includes 1.3% for hospital insurance benefits and 5.4% for retirement, survivors, and disability insurance.</small>							

1 Control number		OMB No. 1545-0008				
2 Employer's name, address, and ZIP code Cabients by Schnell, Inc. 6235 Nielson Way Anchorage, AK 99502			3 Employer's identification number 92-0078408	4 Employer's State number 5050		
8 Employee's social security number 534-50-3748			9 Federal income tax withheld 523.75	10 Wages, tips, other compensation 4903.25	11 Social security tax withheld 322.55	
12 Employee's name, address, and ZIP code Grant Brian Chabot 1230 S. 211th St. Anchorage, AK 98148			13 Social security wages 4903.25	14 Social security tips		
16						

PAYER: STATE OF WASHINGTON
 EMPLOYMENT SECURITY DEPARTMENT
 OLYMPIA, WASHINGTON 98504
 FED I.D. NO. 91-8001089

Statement for
 Recipients of
**Unemployment
 Compensation Payments**
 Copy B - For Recipient

THIS INFORMATION SHOULD BE USED IN
 PREPARING YOUR INCOME TAX RETURN

DEPARTMENT OF THE TREASURY
 INTERNAL REVENUE SERVICE

RECIPIENT'S IDENTIFYING NO. 534-56-3748	1. TOTAL UNEMPLOYMENT COMPENSATION PAYMENTS 1,044.00	UI	CALENDAR YEAR 1984
RECIPIENT'S NAME AND ADDRESS CHABOT GRANT B 1230 S. 211TH ST SEATTLE WA 98148		THIS INFORMATION IS BEING FURNISHED TO THE INTERNAL REVENUE SERVICE	

FORM 1099 UC (REV. 10-84)

SEE NOTICE TO RECIPIENT
ON REVERSE

1 Control number 9	OMB No. 1545-0008				
2 Employer's name, address, and ZIP code WESTERN PACIFIC DRYWALL 7042 South 188th Street Kent, WA 98032			3 Employer's identification number 91-1198886	4 Employer's State number	
			5 Stat. em- ployee <input type="checkbox"/>	De- ceased <input type="checkbox"/>	Legal rep. <input type="checkbox"/>
			942 emp. <input type="checkbox"/>	Sub- total <input type="checkbox"/>	Void <input type="checkbox"/>
			6 Allocated tips	7 Advance EIC payment	
8 Employee's social security number 534-56-3748	9 Federal income tax withheld 563.90	10 Wages, tips, other compensation 3,279.00	11 Social security tax withheld 219.69		
12 Employee's name, address and ZIP code Grant Brian Chabot 1230 S. 211 St. Seattle, WA 98148		13 Social security wages 3,279.00	14 Social security tips		
		16			

Form **W-2 Wage and Tax Statement 1984**

Copy C For employee's records
 This information is being furnished to the Internal Revenue Service.

Department of the Treasury
 Internal Revenue Service

Postal

1040

Department of the Treasury—Internal Revenue Service

U.S. Individual Income Tax Return 1984

(0)

For the year January 1-December 31, 1984, or other tax year beginning 1984, ending 19 OMB No. 1545-0074

Use IRS label. Otherwise, please print or type.	Your first name and initial (if joint return, also give spouse's name and initial)	Last name	Your social security number
	GRANT B + DELORES A CHABOT		534 56 3748
	Present home address (Number and street, including apartment number, or rural route)		Spouse's social security number
1230 S. 211 TH ST.			537 50 5286
City, town or post office, State, and ZIP code		Your occupation	Spouse's occupation
SEATTLE WA 98148		WAREHOUSE / DAYWAGE	

Presidential Election Campaign

Do you want \$1 to go to this fund? Yes No

If joint return, does your spouse want \$1 to go to this fund? Yes No

Note: Checking "Yes" will not change your tax or reduce your refund.

Filing Status

1 Single

2 Married filing joint return (even if only one had income)

3 Married filing separate return. Enter spouse's social security no. above and full name here.

4 Head of household (with qualifying person). (See page 5 of Instructions.) If the qualifying person is your unmarried child but not your dependent, write child's name here.

5 Qualifying widow(er) with dependent child (Year spouse died ▶ 19). (See page 6 of Instructions.)

For Privacy Act and Paperwork Reduction Act Notice, see Instructions.

Exemptions

6a Yourself 65 or over Blind

b Spouse 65 or over Blind

c First names of your dependent children who lived with you

SHAWNA - MICHAEL - NICOLAS

d Other dependents:

(1) Name	(2) Relationship	(3) Number of months lived in your home	(4) Did dependent have income of \$1,000 or more?	(5) Did you provide more than one-half of dependent's support?

e Total number of exemptions claimed (also complete line 36).

Income

7 Wages, salaries, tips, etc. 7 14866 75

8 Interest income (also attach Schedule B if over \$400) 8

9a Dividends (also attach Schedule B if over \$400) 9b Exclusion 9c

c Subtract line 9b from line 9a and enter the result.

10 Refunds of State and local income taxes, from the worksheet on page 9 of Instructions (do not enter an amount unless you itemized deductions for those taxes in an earlier year—see page 9)

11 Alimony received 11

12 Business income or (loss) (attach Schedule C) 12

13 Capital gain or (loss) (attach Schedule D) 13

14 40% of capital gain distributions not reported on line 13 (see page 9 of Instructions) 14

15 Supplemental gains or (losses) (attach Form 4797) 15

16 Fully taxable pensions, IRA distributions, and annuities not reported on line 17 16

17a Other pensions and annuities, including rollovers. Total received 17a

b Taxable amount, if any, from the worksheet on page 10 of Instructions 17b

18 Rents, royalties, partnerships, estates, trusts, etc. (attach Schedule E) 18

19 Farm income or (loss) (attach Schedule F) 19

20a Unemployment compensation (insurance). Total received 20a 1044 00

b Taxable amount, if any, from the worksheet on page 10 of Instructions 20b

21a Social security benefits. (see page 10 of Instructions) 21a

b Taxable amount, if any, from the worksheet on page 11 of Instructions 21b

22 Other income (state nature and source—see page 11 of Instructions) 22

23 Add lines 7 through 22. This is your total income ▶ 23 14866 75

Adjustments to Income

24 Moving expense (attach Form 3903 or 3903F) 24

25 Employee business expenses (attach Form 2106) 25

26a IRA deduction, from the worksheet on page 12 26a

b Enter here IRA payments you made in 1985 that are included in line 26a above ▶

27 Payments to a Keogh (H.R. 10) retirement plan 27

28 Penalty on early withdrawal of savings 28

29 Alimony paid 29

30 Deduction for a married couple when both work (attach Schedule W) 30

31 Add lines 24 through 30. These are your total adjustments ▶ 31

Adjusted Gross Income

32 Subtract line 31 from line 23. This is your adjusted gross income. If this line is less than \$10,000, see "Earned Income Credit" (line 59) on page 16 of Instructions. If you want IRS to figure your tax, see page 12 of Instructions. ▶ 32 14866 75

Tax Computation

(See Instructions on page 13.)

Table with 3 columns: Line number, Description, and Amount. Rows include: 33 Amount from line 32 (adjusted gross income) 14866.75; 34a If you itemize, attach Schedule A (Form 1040) and enter the amount from Schedule A, line 26 5868.76; 34b If you do not itemize deductions, and you have charitable contributions, complete the worksheet on page 14. Then enter the allowable part of your contributions here; 35 Subtract line 34a or 34b, whichever applies, from line 33 8997.99; 36 Multiply \$1,000 by the total number of exemptions claimed on Form 1040, line 6e 5000.00; 37 Taxable Income. Subtract line 36 from line 35. 3997.99; 38 Tax. Enter tax here and check if from [X] Tax Table, [] Tax Rate Schedule X, Y, or Z, or [] Schedule G 63.-; 39 Additional Taxes. (See page 14 of Instructions.) Enter here and check if from [] Form 4970, [] Form 4972, or [] Form 5544.; 40 Add lines 38 and 39. Enter the total. 63.-

Credits

(See Instructions on page 14.)

Table with 3 columns: Line number, Description, and Amount. Rows include: 41 Credit for child and dependent care expenses (attach Form 2441); 42 Credit for the elderly and the permanently and totally disabled (attach Schedule R); 43 Residential energy credit (attach Form 5695); 44 Partial credit for political contributions for which you have receipts; 45 Add lines 41 through 44. These are your total personal credits; 46 Subtract line 45 from 40. Enter the result (but not less than zero) 63.-; 47 Foreign tax credit (attach Form 1116); 48 General business credit. Check if from [] Form 3800, [] Form 3468, [] Form 5884, [] Form 6478; 49 Add lines 47 and 48. These are your total business and other credits; 50 Subtract line 49 from 46. Enter the result (but not less than zero) 63.-

Other Taxes

(Including Advance EIC Payments)

Table with 3 columns: Line number, Description, and Amount. Rows include: 51 Self-employment tax (attach Schedule SE); 52 Alternative minimum tax (attach Form 6251); 53 Tax from recapture of investment credit (attach Form 4255); 54 Social security tax on tip income not reported to employer (attach Form 4137); 55 Tax on an IRA (attach Form 5329); 56 Add lines 50 through 55. This is your total tax 63.-

Payments

Attach Forms W-2, W-2G, and W-2P to front.

Table with 3 columns: Line number, Description, and Amount. Rows include: 57 Federal income tax withheld 1774.73; 58 1984 estimated tax payments and amount applied from 1983 return; 59 Earned income credit. If line 33 is under \$10,000, see page 16; 60 Amount paid with Form 4868; 61 Excess social security tax and RRTA tax withheld (two or more employers); 62 Credit for Federal tax on gasoline and special fuels (attach Form 4136); 63 Regulated Investment Company credit (attach Form 2439); 64 Add lines 57 through 63. These are your total payments 1774.73

Refund or Amount You Owe

Table with 3 columns: Line number, Description, and Amount. Rows include: 65 If line 64 is larger than line 56, enter amount OVERPAID 1711.73; 66 Amount of line 65 to be REFUNDED TO YOU 1711.73; 67 Amount of line 65 to be applied to your 1985 estimated tax; 68 If line 56 is larger than line 64, enter AMOUNT YOU OWE. Attach check or money order for full amount payable to "Internal Revenue Service." Write your social security number and "1984 Form 1040" on it (Check [] If Form 2210 (2210F) is attached. See page 17 of Instructions.) \$

Please Sign Here

Under penalties of perjury, I declare that I have examined this return and accompanying schedules and statements, and to the best of my knowledge and belief, they are true, correct, and complete. Declaration of preparer (other than taxpayer) is based on all information of which preparer has any knowledge.

Your signature Date Spouse's signature (if filing jointly, BOTH must sign)

Paid Preparer's Use Only

Preparer's signature GARRETT, C.P.A. SERVICES 30412 PACIFIC HWY. 903-20-85 Check if self-employed [] Preparer's social security no. 538 88 0860 Firm's name (or yours, if self-employed) and address FEDERAL WAY, WA 98003 E.I. No. 91 1272433 PHONE: 941-4670 ZIP code 98003.

**SCHEDULES A&B
(Form 1040)**

Department of the Treasury
Internal Revenue Service (0)

Schedule A—Itemized Deductions

(Schedule B is on back)

▶ Attach to Form 1040. ▶ See Instructions for Schedules A and B (Form 1040).

OMB No. 1545-0074

1984
07

Name(s) as shown on Form 1040

BRIAN + DELORES CHABOT

Your social security number

534 56 7718

Medical and Dental Expenses (Do not include expenses reimbursed or paid by others.) (See instructions on page 19)	1	Prescription medicines and drugs; and insulin	1		
	2	a	Doctors, dentists, nurses, hospitals, insurance premiums you paid for medical and dental care, etc.	2a	
		b	Transportation and lodging	2b	
		c	Other (list—include hearing aids, dentures, eyeglasses, etc.)	2c	
	3	Add lines 1 through 2c, and write the total here		3	
4	Multiply the amount on Form 1040, line 33, by 5% (.05)		4		
5	Subtract line 4 from line 3. If zero or less, write -0-. Total medical and dental ▶		5		
Taxes You Paid (See instructions on page 20)	6	State and local income taxes S. D. I.	6	139.05	
	7	Real estate taxes	7	550.40	
	8	a	General sales tax (see sales tax tables in instruction booklet)	8a	507.36
		b	General sales tax on motor vehicles	8b	
	9	Other taxes (list—include personal property taxes) ▶	9	47.00	
10	Add the amounts on lines 6 through 9. Write the total here. Total taxes ▶		10		1244.31
Interest You Paid (See instructions on page 20)	11	a	Home mortgage interest you paid to financial institutions	11a	5672.11
		b	Home mortgage interest you paid to individuals (show that person's name and address) ▶	11b	
	12	Total credit card and charge account interest you paid		12	370.54
	13	Other interest you paid (list) ▶	13		
	14	Add the amounts on lines 11a through 13. Write the total here. Total interest ▶		14	
Contributions You Made (See instructions on page 20)	15	a	Cash contributions. (If you gave \$3,000 or more to any one organization, report those contributions on line 15b.)	15a	1841.00
		b	Cash contributions totaling \$3,000 or more to any one organization. (Show to whom you gave and how much you gave.) ▶	15b	
	16	Other than cash (attach required statement)		16	
	17	Carryover from prior year		17	
	18	Add the amounts on lines 15a through 17. Write the total here. Total contributions ▶		18	
Casualty and Theft Losses	19	Total casualty or theft loss(es). (You must attach Form 4684 or similar statement.) (see page 21 of Instructions) ▶		19	
Miscellaneous Deductions (See instructions on page 21)	20	Union and professional dues	20		
	21	Tax return preparation fee	21	40.00	
	22	Other (list type and amount) ▶	22		
	23	Add the amounts on lines 20 through 22. Write the total here. Total miscellaneous ▶		23	
Summary of Itemized Deductions (See instructions on page 22)	24	Add the amounts on lines 5, 10, 14, 18, 19, and 23. Write your answer here.		24	9268.76
	25	If you checked Form 1040 { Filing Status box 2 or 5, write \$3,400 } { Filing Status box 1 or 4, write \$2,300 } { Filing Status box 3, write \$1,700 }		25	3400.00
	26	Subtract line 25 from line 24. Write your answer here and on Form 1040, line 34a. (If line 25 is more than line 24, see the Instructions for line 26 on page 22.) ▶		26	

02937 UNIVERSITY OF WASHINGTON PAYROLL DEPARTMENT, HH-10 SEATTLE, WASHINGTON 98105 91-6001537 69-0910001		150	Year 1985	Wage and Tax Statement OMB No. 1545-0008	
Employee's social security number 34-56-1748		9 Federal income tax withheld 1,544.68	10 Wages, tips, other compensation 10,378.82	Soc. sec. tax withheld 731.71	Soc. sec. wages 10,378.82
Pension plan coverage? Yes/No NO		Allocated tips		Soc. sec. tips	
Employee's name ERANT B. CHABOT 1230 S. 211 ST. SEATTLE WA 98148		State or local tax withheld	State or local wages	State or locality	
Employee's address and ZIP code		State or local tax withheld	State or local wages	State or locality	
The social security rate of 6.70% for hospital insurance, benefits and 5.40% for retirement, survivors, and disability insurance.		State or locality		State or locality	

1 Control number WA 0050		OMB No. 1545-0008			
2 Employer's name, address, and ZIP code ROBERT E. BAYLEY CONSTRUCTION, INC. ONE UNION SQUARE BUILDING #1601 SEATTLE, WASHINGTON 98101		3 Employer's identification number 91-0754717	4 Employer's State number		
8 Employee's social security number 534-56-3748		9 Federal income tax withheld 0.00	10 Wages, tips, other compensation 88.90	11 Social security tax withheld 6.27	
12 Employee's name, address, and ZIP code BRIAN CHABOT BRIAN CHABOT 1230 S. 211 ST. SEATTLE, WA. 98148		13 Social security wages 88.90	14 Social security tips 0.00	16	
		17 State income tax 0.00	18 State wages, tips, etc. 88.90	19 Name of State WASH. FIELD	
		20 Local income tax	21 Local wages, tips, etc.	22 Name of locality	

1 Control Number		OMB No. 1545-0008			
2 Employer's Name, Address, and ZIP Code		3 Employer's Identification Number	4 Employer's State Number		
GIEBEL AND MCCANDLESS, INC. 3706 AIRPORT WAY S. SEATTLE, WASH. 98134		91-1084653			
		5 Stat. Employee	Deceased	Legal rep.	942 Emp.
		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Subtotal
				<input type="checkbox"/>	Void
		6 Allocated Tips		7 Advance EIC Payment	
8 Employee's Social Security Number		9 Federal Income Tax Withheld		10 Wages, Tips, Other Compensation	11 Social Security Tax Withheld
534-56-3748		1447.91		11008.38	773.48
12 Employee's Name, Address, and ZIP Code		13 Social Security Wages	14 Social Security Tips		
GRANT B. CHABOT		11008.38			
		16			
		17 State Income Tax	18 State Wages, Tips, Etc.	19 Name of State	
		0.00	11008.38	Washington	
		20 Local Income Tax	21 Local Wages, Tips, Etc.	22 Name of Locality	

Form W-2 Wage and Tax Statement 1985
36-2515832 I.R.S. APP.

Copy C For employee's records
This information is being furnished to the Internal Revenue Service

Department of the Treasury
Internal Revenue Service

1 Control number		OMB No. 1545-0008			
2 Employer's name, address, and ZIP code		3 Employer's identification number	4 Employer's State number		
L. Best Construction Company 13023 N. E. 70th Place Kirkland, Washington 98033		91-1139638			
		5 Statutory employee	Deceased	Legal rep.	942 emp.
		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Subtotal
				<input type="checkbox"/>	Void
		6 Allocated tips		7 Advance EIC payment	
8 Employee's social security number		9 Federal income tax withheld		10 Wages, tips, other compensation	11 Social security tax withheld
534-56-3748		-0-		35.63	2.51
12 Employee's name, address, and ZIP code		13 Social security wages	14 Social security tips		
G. Brian CHABOT		35.63			
		16			
		17 State income tax	18 State wages, tips, etc.	19 Name of State	
		20 Local income tax	21 Local wages, tips, etc.	22 Name of locality	

Form W-2 Wage and Tax Statement 1985

Copy C For EMPLOYEE'S RECORDS
This information is being furnished to the Internal Revenue Service.

Department of the Treasury
Internal Revenue Service

1 Control number		OMB No. 1545-0008							
2 Employer's name, address, and ZIP code L. Best Construction Company 13023 N. E. 70th Place Kirkland, Washington 98033				3 Employer's identification number 91-1139623		4 Employer's State number			
				5 Statutory employee Deceased Legal rep. 942 emp Subtotal Void <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>		6 Allocated tips		7 Advance EIC payment	
				8 Employee's social security number 534-56-3743		9 Federal income tax withheld -0-		10 Wages, tips, other compensation 35.63	
12 Employee's name, address, and ZIP code G. Brian CHABOT 1230 South 211st Seattle, Washington 98148				13 Social security wages 35.63		14 Social security tips			
				16					
				17 State income tax		18 State wages, tips, etc.		19 Name of State	
				20 Local income tax		21 Local wages, tips, etc.		22 Name of locality	

Form **W-2 Wage and Tax Statement 1985** Copy 1 For State, City, or Local Tax Department
Employee's and employer's copy compared

1 Control Number		OMB No. 1545-0008							
2 Employer's Name, Address, and ZIP Code GIEBEL AND MCCANDLESS, INC. 3706 AIRPORT WAY S. SEATTLE, WASH. 98134				3 Employer's Identification Number 91-1084653		4 Employer's State Number			
				5 Stat. Employee Deceased Legal Rep. 942 Emp. Subtotal Void <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>		6 Allocated Tips		7 Advance EIC Payment	
				8 Employee's Social Security Number 534-56-3743		9 Federal Income Tax Withheld 1447.31		10 Wages, Tips, Other Compensation 11009.38	
12 Employee's Name, Address, and ZIP Code GRANT D. CHABOT 1230 S. 211TH ST. SEATTLE, WA 98148				13 Social Security Wages 11009.38		14 Social Security Tips			
				16					
				17 State Income Tax 0.00		18 State Wages, Tips, Etc. 11009.38		19 Name of State Washing	
				20 Local Income Tax		21 Local Wages, Tips, Etc.		22 Name of Locality	

Form **W-2 Wage and Tax Statement 1985**
36-2515832 I.R.S. APP.

Copy D For Employer

Department of the Treasury
Internal Revenue Service

1 Control Number		OMB No. 1545-0008			
2 Employer's Name, Address, and ZIP Code			3 Employer's Identification Number		4 Employer's State Number
GIEBEL AND MCCANDLESS, INC. 3706 AIRPORT WAY S. SEATTLE, WASH. 98134			91-1084653		
			5 Stat. Employee <input type="checkbox"/>	Deceased <input type="checkbox"/>	Legal Rep. <input type="checkbox"/>
			942 Emp. <input type="checkbox"/>	Subtotal <input type="checkbox"/>	Void <input type="checkbox"/>
			6 Allocated Tips		7 Advance EIC Payment
8 Employee's Social Security Number		9 Federal Income Tax Withheld		10 Wages, Tips, Other Compensation	11 Social Security Tax Withheld
534-56-3743		1447.91		11008.38	778.48
12 Employee's Name, Address, and ZIP Code			13 Social Security Wages		14 Social Security Tips
GRANT B. CHABOT 1230 S. 211TH ST. SEATTLE, WA 98148			11008.38		
			16		
17 State Income Tax		18 State Wages, Tips, Etc.		19 Name of State	
0.00		11008.38		Washington	
20 Local Income Tax		21 Local Wages, Tips, Etc.		22 Name of Locality	

Form W-2 Wage and Tax Statement 1985
36-2515832 I.R.S. APP.

Copy D For Employer

Department of the Treasury
Internal Revenue Service

For the year January 1-December 31, 1985, or other tax year beginning 1985, ending 19 OMB No. 1545-0074

Use IRS label. Other-wise, please print or type. US 534-56-3748 537-50-5286 S29 10 GRANT B & DELORES A CHABOT 1230 S 211TH ST SEATTLE WA 98148 **CR 42 R 585S Your social security number Spouse's social security number Your occupation DRYWALL INSTALLER Spouse's occupation HOME MAKER

Presidential Election Campaign Do you want \$1 to go to this fund? If joint return, does your spouse want \$1 to go to this fund? Yes No Yes No

Filing Status 1 Single 2 Married filing joint return (even if only one had income) 3 Married filing separate return. Enter spouse's social security no. above and full name here. 4 Head of household (with qualifying person). (See page 5 of Instructions.) If the qualifying person is your unmarried child but not your dependent, write child's name here. 5 Qualifying widow(er) with dependent child (year spouse died 19). (See page 6 of Instructions.)

Exemptions 6a Yourself 65 or over Blind 6b Spouse 65 or over Blind Enter number of boxes checked on 6a and b 2 c First names of your dependent children who lived with you SHAWNA, MICHAEL, NICOLAS Enter number of children listed on 6c 3 d First names of your dependent children who did not live with you (if pre-1985 agreement, check here) Enter number of children listed on 6d e Other dependents: (1) Name (2) Relationship (3) Number of months lived in your home (4) Did dependent have income of \$1,040 or more? (5) Did you provide more than one-half of dependent's support? Enter number of other dependents Add numbers entered in boxes above 5 f Total number of exemptions claimed (also complete line 36).

Income 7 Wages, salaries, tips, etc. (Attach Form(s) W-2.) 8 Interest income (also attach Schedule B if over \$400) 9a Dividends (also attach Schedule B if over \$400) 9b Exclusion 9c Subtract line 9b from line 9a and enter the result. 10 Taxable refunds of state and local income taxes, if any, from the worksheet on page 9 of Instructions. 11 Alimony received 12 Business income or (loss) (attach Schedule C). 13 Capital gain or (loss) (attach Schedule D). 14 40% of capital gain distributions not reported on line 13 (see page 9 of Instructions) 15 Other gains or (losses) (attach Form 4797) 16 Fully taxable pensions, IRA distributions, and annuities not reported on line 17 (see page 9). 17a Other pensions and annuities, including rollovers. Total received 17a 17b Taxable amount, if any, from the worksheet on page 10 of Instructions 18 Rents, royalties, partnerships, estates, trusts, etc. (attach Schedule E) 19 Farm income or (loss) (attach Schedule F) 20a Unemployment compensation (insurance). Total received 20a 1782.00 20b Taxable amount, if any, from the worksheet on page 10 of Instructions 20b 1782.00 21a Social security benefits (see page 10). Total received 21a 21b Taxable amount, if any, from worksheet on page 11. Tax-exempt interest 22 Other income (list type and amount—see page 11 of Instructions) 22 23 Add lines 7 through 22. This is your total income 23 23293.73

Adjustments to Income 24 Moving expense (attach Form 3903 or 3903F) 25 Employee business expenses (attach Form 2106) 26 IRA deduction, from the worksheet on page 12 27 Keogh retirement plan deduction 28 Penalty on early withdrawal of savings 29 Alimony paid (recipient's last name and social security no.) 29 30 Deduction for a married couple when both work (attach Schedule W) 30 31 Add lines 24 through 30. These are your total adjustments 31

Adjusted Gross Income 32 Subtract line 31 from line 23. This is your adjusted gross income. If this line is less than \$11,000 and a child lived with you, see "Earned Income Credit" (line 59) on page 16 of Instructions. If you want IRS to figure your tax, see page 13 of Instructions. 32 23293.73

TAX PAYER COPY See Instructions on page 11.

Tax Computation	33	Amount from line 32 (adjusted gross income)	33	23293	73
	34a	If you itemize, attach Schedule A (Form 1040) and enter the amount from Schedule A, line 26. Caution: If you have unearned income and can be claimed as a dependent on your parents' return, check here <input type="checkbox"/> and see page 13 of Instructions. Also see page 13 if you are married filing a separate return and your spouse itemizes deductions, or you are a dual-status alien.	34a	5497	80
	b	If you do not itemize but you made charitable contributions, enter your cash contributions here. (If you gave \$3,000 or more to any one organization, see page 14.)	34b		
	c	Enter your noncash contributions (you must attach Form 8283 if over \$500)	34c		
	d	Add lines 34b and 34c. Enter the total	34d		
	e	Divide the amount on line 34d by 2. Enter the result here	34e		
	35	Subtract line 34a or line 34e, whichever applies, from line 33	35	17795	93
	36	Multiply \$1,040 by the total number of exemptions claimed on line 6f (see page 14)	36	5200	00
	37	Taxable income. Subtract line 36 from line 35. Enter the result (but not less than zero)	37	12595	93
	38	Enter tax here. Check if from <input checked="" type="checkbox"/> Tax Table, <input type="checkbox"/> Tax Rate Schedule X, Y, or Z, or <input type="checkbox"/> Schedule G	38	1159	00
	39	Additional taxes. (See page 14 of Instructions.) Enter here and check if from <input type="checkbox"/> Form 4970, <input type="checkbox"/> Form 4972, or <input type="checkbox"/> Form 5544.	39		
	40	Add lines 38 and 39. Enter the total	40	1159	00
Credits	41	Credit for child and dependent care expenses (attach Form 2441)	41		
	42	Credit for the elderly and the permanently and totally disabled (attach Schedule R)	42		
	43	Residential energy credit (attach Form 5695)	43		
	44	Partial credit for political contributions for which you have receipts	44		
	45	Add lines 41 through 44. These are your total personal credits	45		
	46	Subtract line 45 from line 40. Enter the result (but not less than zero)	46	1159	00
	47	Foreign tax credit (attach Form 1116)	47		
	48	General business credit. Check if from <input type="checkbox"/> Form 3800, <input type="checkbox"/> Form 3468, <input type="checkbox"/> Form 5884, <input type="checkbox"/> Form 6478.	48		
	49	Add lines 47 and 48. These are your total business and other credits	49		
	50	Subtract line 49 from line 46. Enter the result (but not less than zero)	50	1159	00
Other Taxes	51	Self-employment tax (attach Schedule SE)	51		
	52	Alternative minimum tax (attach Form 6251)	52		
	53	Tax from recapture of investment credit (attach Form 4255)	53		
	54	Social security tax on tip income not reported to employer (attach Form 4137)	54		
	55	Tax on an IRA (attach Form 5329)	55		
	56	Add lines 50 through 55. This is your total tax	56	1159	00
Payments	57	Federal income tax withheld	57	2992	59
	58	1985 estimated tax payments and amount applied from 1984 return	58		
	59	Earned income credit (see page 16)	59		
	60	Amount paid with Form 4868	60		
	61	Excess social security tax and RRTA tax withheld (two or more employers)	61		
	62	Credit for Federal tax on gasoline and special fuels (attach Form 4136)	62		
	63	Regulated Investment Company credit (attach Form 2439)	63		
	64	Add lines 57 through 63. These are your total payments	64	2992	59
Refund or Amount You Owe	65	If line 64 is larger than line 56, enter amount OVERPAID	65	1833	59
	66	Amount of line 65 to be REFUNDED TO YOU	66	1833	59
	67	Amount of line 65 to be applied to your 1986 estimated tax	67		
	68	If line 56 is larger than line 64, enter AMOUNT YOU OWE. Attach check or money order for full amount payable to "Internal Revenue Service." Write your social security number and "1985 Form 1040" on it. Check <input type="checkbox"/> if Form 2210 (2210F) is attached. See page 17. Penalty: \$	68		

Please Sign Here

Under penalties of perjury, I declare that I have examined this return and accompanying schedules and statements, and to the best of my knowledge and belief, they are true, correct, and complete. Declaration of preparer (other than taxpayer) is based on all information of which preparer has any knowledge.

Paid Preparer's Use Only	Preparer's signature	Date	Check if self-employed <input type="checkbox"/>	Preparer's social security no.
	Firm's name (or yours, if self-employed) and address		E.I. No.	ZIP code

[Signature]
 Date 3-6-86
GARRETT C.P.A. SERVICES
 30812 PACIFIC HWY. 30
 FEDERAL WAY, WA 98003
 PHONE: 941-4670

**SCHEDULES A&B
(Form 1040)**

Department of the Treasury
Internal Revenue Service (O)

Schedule A—Itemized Deductions

(Schedule B is on back)

▶ Attach to Form 1040. ▶ See Instructions for Schedules A and B (Form 1040).

OMB No. 1545-0074

1985
07

Name(s) as shown on Form 1040

GRANT B + DELORES A CHABOT

Your social security number

534 56 3748

Medical and Dental Expenses (Do not include expenses reimbursed or paid by others.) (See instructions on page 19.)	1	Prescription medicines and drugs; and insulin	1			
	2	a Doctors, dentists, nurses, hospitals, insurance premiums you paid for medical and dental care, etc.	2a			
		b Transportation and lodging	2b			
		c Other (list—include hearing aids, dentures, eyeglasses, etc.) ▶	2c			
	3	Add lines 1 through 2c, and write the total here	3			
	4	Multiply the amount on Form 1040, line 33, by 5% (.05)	4			
	5	Subtract line 4 from line 3. If zero or less, write -0-. Total medical and dental ▶	5			<u>6</u>
Taxes You Paid (See instructions on page 20.)	6	State and local income taxes	6			
	7	Real estate taxes	7	<u>570 01</u>		
	8	a General sales tax (see sales tax tables in instruction booklet)	8a	<u>615 00</u>		
		b General sales tax on motor vehicles	8b	<u>57 00</u>		
	9	Other taxes (list—include personal property taxes) ▶	9	<u>38 42</u>		
10	Add the amounts on lines 6 through 9. Write the total here. Total taxes ▶	10				<u>1280 43</u>
Interest You Paid (See instructions on page 20.)	11	a Home mortgage interest you paid to financial institutions	11a	<u>4424 77</u>		
		b Home mortgage interest you paid to individuals (show that person's name and address) ▶	11b			
	12	Total credit card and charge account interest you paid	12			
	13	Other interest you paid (list) ▶ <u>VISA -</u> <u>SEARS</u>	13	<u>218 77</u> <u>112 83</u>		
	14	Add the amounts on lines 11a through 13. Write the total here. Total interest ▶	14			
Contributions You Made (See instructions on page 21.)	15	a Cash contributions. (If you gave \$3,000 or more to any one organization, report those contributions on line 15b.)	15a	<u>2751 00</u>		
		b Cash contributions totaling \$3,000 or more to any one organization. (Show to whom you gave and how much you gave.) ▶	15b			
	16	Other than cash. (You must attach Form 8283 if over \$500.)	16	<u>150 00</u>		
	17	Carryover from prior year	17			
18	Add the amounts on lines 15a through 17. Write the total here. Total contributions ▶	18				<u>2901 00</u>
Casualty and Theft Losses	19	Total casualty or theft loss(es). (You must attach Form 4684 or similar statement.) (See page 21 of instructions.) ▶	19			
Miscellaneous Deductions (See instructions on page 21.)	20	Union and professional dues	20			
	21	Tax return preparation fee	21	<u>50 00</u>		
	22	Other (list type and amount) ▶ <u>SMALL TOOLS</u>	22	<u>50 00</u>		
	23	Add the amounts on lines 20 through 22. Write the total here. Total miscellaneous ▶	23			
Summary of Itemized Deductions (See instructions on page 22.)	24	Add the amounts on lines 5, 10, 14, 18, 19, and 23. Write your answer here.	24			<u>9037 80</u>
	25	If you checked Form 1040 { Filing Status box 2 or 5, write \$3,540 } { Filing Status box 1 or 4, write \$2,390 } { Filing Status box 3, write \$1,770 }	25			<u>3540 00</u>
	26	Subtract line 25 from line 24. Write your answer here and on Form 1040, line 34a. (If line 25 is more than line 24, see the instructions for line 26 on page 22.) ▶	26			<u>5497 80</u>

Garrett C.P.A. Service

30812 Pacific Highway South
Federal Way, WA 98003
(206) 941-4670

Dear Client:

Thank you for allowing us to prepare your 1985 Income Tax Return. We appreciate the opportunity to serve you.

Please check, sign, and date your '85 return at the red arrow's before mailing in the enclosed envelope to the I.R.S. Check to be certain a copy of each of your W-2's is attached to the front of the return. We recommend you send your return by registered mail to avoid delays and the possibility of I.R.S. not recording it's receipt. The copy in the attached envelope is for your records. We suggest you retain your tax returns and supporting documents for a five year period.

Enclose a check for the amount of \$ _____ and make it payable to the Internal Revenue Service. Be sure to write your social security number on the check for proper identification.

You have a refund due from the Internal Revenue Service in the amount of \$ 1823.59. You should receive this within eight to ten weeks.

Sincerely yours,

GARRETT C.P.A. SERVICE


Steven P. Garrett

SPG:mh

For the year January 1-December 31, 1986, or other tax year beginning 1986, ending 19 OMB No. 1545-0074

Use IRS label. Otherwise, please print or type.	Your first name and initial (if joint return, also give spouse's name and initial) Last name GRANT B. & DELORES A. CHABOT	Your social security number 534 56 3748
	Present home address (number and street or rural route). (If you have a P.O. Box, see page 4 of Instructions.) 416 S. 188TH	Spouse's social security number 537 50 5286
	City, town or post office, state, and ZIP code SEATTLE WASH. 98148	If this address is different from the one shown on your 1985 return, check here <input checked="" type="checkbox"/>

Presidential Election Campaign Do you want \$1 to go to this fund? Yes No
 If joint return, does your spouse want \$1 to go to this fund? Yes No
 Note: Checking "Yes" will not change your tax or reduce your refund.

Filing Status

1	<input type="checkbox"/>	Single
2	<input checked="" type="checkbox"/>	Married filing joint return (even if only one had income)
3	<input type="checkbox"/>	Married filing separate return. Enter spouse's social security no. above and full name here.
4	<input type="checkbox"/>	Head of household (with qualifying person). (See page 5 of Instructions.) If the qualifying person is your unmarried child but not your dependent, enter child's name here
5	<input type="checkbox"/>	Qualifying widow(er) with dependent child (year spouse died ▶ 19). (See page 6 of Instructions.)

For Privacy Act and Paperwork Reduction Act Notice, see Instructions.

Exemptions

6a	<input checked="" type="checkbox"/>	Yourself	<input type="checkbox"/>	65 or over	<input type="checkbox"/>	Blind	Enter number of boxes checked on 6a and b ▶ 2
b	<input checked="" type="checkbox"/>	Spouse	<input type="checkbox"/>	65 or over	<input type="checkbox"/>	Blind	
c	First names of your dependent children who lived with you SHAWNA, MICHAEL, NICHOLAS						Enter number of children listed on 6c ▶ 3
d	First names of your dependent children who did not live with you (see page 6). (If pre-1985 agreement, check here <input type="checkbox"/>)						Enter number of children listed on 6d ▶ <input type="checkbox"/>
e	Other dependents: (1) Name		(2) Relationship	(3) Number of months lived in your home	(4) Did dependent have income of \$1,080 or more?	(5) Did you provide more than one-half of dependent's support?	Enter number of other dependents Add numbers entered in boxes above ▶ 5
f	Total number of exemptions claimed (also complete line 36).						5

Income

7	Wages, salaries, tips, etc. (attach Form(s) W-2)	7	27776 50
8	Interest income (also attach Schedule B if over \$400)	8	
9a	Dividends (also attach Schedule B if over \$400)	9a	
9b	Exclusion	9b	
9c	Subtract line 9b from line 9a and enter the result	9c	
10	Taxable refunds of state and local income taxes, if any, from the worksheet on page 9 of Instructions.	10	
11	Alimony received	11	
12	Business income or (loss) (attach Schedule C)	12	
13	Capital gain or (loss) (attach Schedule D)	13	
14	40% of capital gain distributions not reported on line 13 (see page 9 of Instructions)	14	
15	Other gains or (losses) (attach Form 4797)	15	
16	Fully taxable pensions, IRA distributions, and annuities not reported on line 17 (see page 9)	16	
17a	Other pensions and annuities, including rollovers. Total received	17a	
17b	Taxable amount, if any, from the worksheet on page 10 of Instructions	17b	
18	Rents, royalties, partnerships, estates, trusts, etc. (attach Schedule E)	18	
19	Farm income or (loss) (attach Schedule F)	19	
20a	Unemployment compensation (insurance). Total received	20a	
20b	Taxable amount, if any, from the worksheet on page 10 of Instructions	20b	
21a	Social security benefits (see page 10)	21a	
21b	Taxable amount, if any, from worksheet on page 11. { Tax-exempt interest }	21b	
22	Other income (list type and amount—see page 11 of Instructions)	22	
23	Add the amounts shown in the far right column for lines 7 through 22. This is your total income	23	27776 50

Adjustments to Income

24	Moving expenses (attach Form 3903 or 3903F)	24	
25	Employee business expenses (attach Form 2106)	25	
26	IRA deduction, from the worksheet on page 12	26	
27	Keogh retirement plan and self-employed SEP deduction	27	
28	Penalty on early withdrawal of savings	28	
29	Alimony paid (recipient's last name and social security no.)	29	
30	Deduction for a married couple when both work (attach Schedule W)	30	
31	Add lines 24 through 30. These are your total adjustments	31	- 0 -

Adjusted Gross Income

32	Subtract line 31 from line 23. This is your adjusted gross income. If this line is less than \$11,000 and a child lived with you, see "Earned Income Credit" (line 58) on page 16 of Instructions. If you want IRS to figure your tax, see page 13 of Instructions	32	27776 50
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Tax Computation

(See Instructions on page 13.)

Table with 4 columns: Line number, Description, Sub-column, and Amount. Rows include 33 (Amount from line 32), 34a (Itemized deductions), 34b (Charitable contributions), 34c (Noncash contributions), 34d (Total of 34b and 34c), 35 (Subtraction), 36 (Exemptions), 37 (Taxable income), 38 (Tax), 39 (Additional taxes), and 40 (Total tax).

Credits

(See Instructions on page 14.)

Table with 4 columns: Line number, Description, Sub-column, and Amount. Rows include 41 (Child and dependent care), 42 (Elderly/disabled), 43 (Political contributions), 44 (Total credits), 45 (Subtraction), 46 (Foreign tax credit), 47 (General business credit), 48 (Total credits), and 49 (Subtraction).

Other Taxes

(Including Advance EIC Payments)

Table with 4 columns: Line number, Description, Sub-column, and Amount. Rows include 50 (Self-employment tax), 51 (Alternative minimum tax), 52 (Recapture of investment credit), 53 (Social security tax on tip income), 54 (Tax on IRA), and 55 (Total other taxes).

Payments

Attach Forms W-2, W-2G, and W-2P to front.

Table with 4 columns: Line number, Description, Sub-column, and Amount. Rows include 56 (Federal income tax withheld), 57 (1986 estimated tax payments), 58 (Earned income credit), 59 (Amount paid with Form 4868), 60 (Excess social security tax), 61 (Gasoline tax credit), 62 (Regulated investment company credit), and 63 (Total payments).

Refund or Amount You Owe

Table with 4 columns: Line number, Description, Sub-column, and Amount. Rows include 64 (Overpaid), 65 (Refunded to you), 66 (Applied to 1987 estimated tax), and 67 (Amount you owe).

Under penalties of perjury, I declare that I have examined this return and accompanying schedules and statements, and to the best of my knowledge and belief, they are true, correct, and complete. Declaration of preparer (other than taxpayer) is based on all information of which preparer has any knowledge.

Please Sign Here

Signature section with columns for Taxpayer's signature, Spouse's signature, Date, Your occupation, and Spouse's occupation.

Paid Preparer's Use Only

Preparer information section with columns for Preparer's signature, Date, Check if self-employed, Preparer's social security no., Firm's name and address, E.I. No., and ZIP code.

SEATTLE, WASH 98166

**SCHEDULES A&B
(Form 1040)**

Department of the Treasury
Internal Revenue Service

Schedule A—Itemized Deductions

(Schedule B is on back)

▶ Attach to Form 1040. ▶ See instructions for Schedules A and B (Form 1040).

OMB No. 1545-0074

1986

Attachment
Sequence No. 07

Name(s) as shown on Form 1040

GRANT B. & DELORES A. CHABOT

Your social security number

534 56 3748

Medical and Dental Expenses (Do not include expenses reimbursed or paid by others.) (See instructions on page 19.)	1	Prescription medicines and drugs; and insulin	1					
	2	a	Doctors, dentists, nurses, hospitals, insurance premiums you paid for medical and dental care, etc.	2a				
		b	Transportation and lodging	2b				
		c	Other (list—include hearing aids, dentures, eyeglasses, etc.) ▶	2c				
	3	Add lines 1 through 2c, and enter the total here	3					
4	Multiply the amount on Form 1040, line 33, by 5% (.05)	4						
5	Subtract line 4 from line 3. If zero or less, enter -0-. Total medical and dental ▶	5				-6-		
Taxes You Paid (See instructions on page 20.)	6	State and local income taxes	6					
	7	Real estate taxes	7	603	31			
	8	a	General sales tax (see sales tax tables in instruction booklet)	8a	557	00		
		b	General sales tax on motor vehicles	8b				
	9	Other taxes (list—include personal property taxes) ▶	9	50	00			
10	Add the amounts on lines 6 through 9. Enter the total here. Total taxes ▶	10				1210 31		
Interest You Paid (See instructions on page 20.)	11	a	Home mortgage interest paid to financial institutions (report deductible points on line 13)	11a	4791	01		
		b	Home mortgage interest you paid to individuals (show that person's name and address) ▶	11b				
	12	Total credit card and charge account interest you paid	12	144	74			
	13	Other interest you paid (list payee's name and amount) ▶	13					
	14	Add the amounts on lines 11a through 13. Enter the total here. Total interest ▶	14				4935 75	
Contributions You Made (See instructions on page 21.)	15	a	Cash contributions. (If you gave \$3,000 or more to any one organization, report those contributions on line 15b.)	15a	310	00		
		b	Cash contributions totaling \$3,000 or more to any one organization. (Show to whom you gave and how much you gave.) ▶	15b				
	16	Other than cash. (You must attach Form 8283 if over \$500.)	16					
	17	Carryover from prior year	17					
	18	Add the amounts on lines 15a through 17. Enter the total here. Total contributions ▶	18				310 00	
Casualty and Theft Losses	19	Total casualty or theft loss(es). (You must attach Form 4684 or similar statement.) (See page 21 of Instructions.) ▶	19				-0-	
Miscellaneous Deductions (See instructions on page 22.)	20	Union and professional dues	20					
	21	Tax return preparation fee	21	50	00			
	22	Other (list type and amount) ▶	22					
		Tools 50.00						
	23	Add the amounts on lines 20 through 22. Enter the total here. Total miscellaneous ▶	23				100 00	
Summary of Itemized Deductions (See instructions on page 22.)	24	Add the amounts on lines 5, 10, 14, 18, 19, and 23. Enter your answer here.	24				6556 06	
	25	If you checked Form 1040 { Filing Status box 2 or 5, enter \$3,670 } { Filing Status box 1 or 4, enter \$2,480 } { Filing Status box 3, enter \$1,835 }	25					
							3670 00	
26	Subtract line 25 from line 24. Enter your answer here and on Form 1040, line 34a. (If line 25 is more than line 24, see the instructions for line 26 on page 22.) ▶	26				2886 06		

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

SANDY EHRLICH and MICHAEL)
EHRLICH, wife and husband;)
LARRY LEMKE, parent; LARRY)
LEMKE, Guardian ad Litem on)
behalf of SYBIL N. LEMKE, a)
minor; KATHRYN REYNOLDS; DEE)
CHABOT, parent; DEE CHABOT,)
Guardian ad Litem on behalf)
of SHAWNA MICHELLE CHABOT,)
MICHAEL GRANT CHABOT, NICHOLAS)
STERLING CHABOT, minors,)

Plaintiffs,

v.

RALPH ALSKOG and ROSEMARY)
ALSKOG, husband and wife;)
ROBERT HOWERTON and JANE DOE)
HOWERTON, husband and wife;)
E. SCOTT HARTLEY and JANE DOE)
HARTLEY; DONALD LEE BARNETT)
and BARBARA BARNETT, husband)
and wife; COMMUNITY CHAPEL)
AND BIBLE TRAINING CENTER,)
a Washington corporation;)
"JOHN DOES" 1-4 and "JANE)
DOES" 1-4, husbands and wives;)
FIRST DOE CORPORATION; and)
FIRST DOE PARTNERSHIP,)

Defendants.

NO. 86-2-18429-5

INTERROGATORIES AND REQUEST
FOR PRODUCTION DIRECTED TO
PLAINTIFF

TO: DEE CHABOT, as guardian ad litem for SHAWNA MICHELLE
CHABOT, Plaintiff; and

TO: RICHARD H. ADLER, her attorney

INTERROGS & REQ FOR
PRODUCTION TO PLTF - 1

LEE, SMART, COOK, MARTIN & PATTERSON, P.S., INC.
ATTORNEYS AT LAW
800 WASHINGTON BUILDING
1325 FOURTH AVENUE
SEATTLE, WASHINGTON 98101
(206) 624-7990

Handwritten initials: HJ, 94

1 Pursuant to Rule 33 and 34, Civil Rules for Superior Court,
2 you are requested to supply answers to interrogatories and request
3 for production on the following pages. As required by CR 33 and 34,
4 please enter full and complete answers to each and every part in the
5 blank space provided, inserting additional pages where necessary;
6 verify your answers on the form provided after the last interroga-
7 tory; and serve a complete set of the interrogatories, answers and
8 attachments on the undersigned and file the original with the Clerk
9 of the Court within twenty (20) days of receipt hereof.

10 These interrogatories are continuing and require supple-
11 mental answers upon discovery of additional pertinent information
12 [CR 26(e)]. "Her" or "she" means Shawna Michelle Chabot.

13 DATED this 24 day of November, 1986.

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

16 By Michael J. Bond
17 Michael J. Bond
18 Of Attorneys for Defendants

- 19 1. (a) State her full name and address.
20 (b) Has she ever gone under any other name or
21 different spelling of said name? If so, what
22 name or different spelling?
23 (c) State the date and place of her birth.
24 (d) State her Social Security number.

25 ANSWER:

- a) Shawna Michelle Chabot, 1230 S. 211th, Seattle 98198
b) no
c) January 14, 1975, Seattle, WA.
d) She does not have one at this time.

INTERROGS & REQ FOR
PRODUCTION TO PLTF - 2

LEE, SMART, COOK, MARTIN & PATTERSON, P.S., INC.
ATTORNEYS AT LAW
800 WASHINGTON BUILDING
1325 FOURTH AVENUE
SEATTLE, WASHINGTON 98101
(206) 624-7990

1 6. Has she ever been hospitalized. If so, list the approx-
2 imate dates, the reasons for the hospitalization, and
the name and address of the hospital.

3 ANSWER: No

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10 7. List any and all sicknesses or diseases suffered during
11 her lifetime, the approximate dates thereof and periods
of disability (omit minor childhood diseases and illnes-
12 ses).

13 ANSWER:Objection: vague and ambiguous. Notwithstanding objection
she has not been seriously sick.

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19 8. List the names and addresses of all doctors, psychia-
20 trists, psychologists, osteopaths, chiropractors or
21 healers who have treated her the last ten years pre-
ceding the accident, the reason for the treatment, the
22 nature of the treatment, and the approximate dates
thereof.

23 ANSWER: Objection: vague and ambiguous. Definition of "the
24 accident" needed to complete interrogatory answer. Without waiving
objection, Shawna has seen Neil Duncanson, M.D. Seattle,WA. and
25 Reed Davis, Ph.D., Seattle,WA.

1 2. If she has lived in any other part of the United States,
2 name all such other places and dates.

3 ANSWER: N/A

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6 3. List the addresses, with the dates, where she resided
during the past ten years.

7 ANSWER: 1976- Burien Gardens, Seattle, WA.
8 1977-301 S. 185th and 10851-6th Ave. S., Seattle, WA
9 1978- 10851-6th Ave. S. and 1230 S. 211th, Seattle, WA.
1978-1986- 1230 S. 211th, Seattle, WA.

10
11 4. State the month and year she last attended any school,
12 the highest grade or year completed, and the name and
location of each such school.

13 ANSWER: Presently attending fifth grade at Des Moines Elementary.

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17 5. List all injuries caused by any accident during her
18 lifetime, stating the place, date and nature.

19 ANSWER: Objection: vague, ambiguous, and overly burdensome.
20 Definition of "accident" needed to complete answer to interrogatory.
21 Without waiving objection, Shawna has not been in any major accidents.

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9. Set forth exactly what injuries she claims she received as a result of this incident.

ANSWER: Objection: vague and ambiguous. Definition of "this incident" needed to complete interrogatory answer. Without waiving this objection, please see Plaintiffs complaint for personal injuries and damages.

10. List the names and addresses of all doctors and/or physical therapists who have treated her from the time of the occurrence alleged in her Complaint, to date.

ANSWER: Objection, vague and ambiguous. Definition of "the occurrence" needed to complete interrogatory answer. Without waiving this objection, Shawna has seen Dr. Davis.

11. List the dates of treatment and/or examination by the doctors and/or physical therapists referred to by her in response to Interrogatory No. 12.

ANSWER: Objection, vague. It makes no sense

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12. State the nature of the treatment by those doctors and/or physical therapists listed by her in response to Interrogatory No. 12.

ANSWER: See answer to Interrogatory No. 11.

13. Was she hospitalized as a result of her claimed injuries? If so, state the dates of hospitalization and where hospitalized.

ANSWER: No.

14. Give an itemization of all hospital and medical expenses incurred by her which she attributes to the incident alleged in her Complaint.

ANSWER: Objection, vague and ambiguous. Definition of "the incident" needed to correctly answer interrogatory. We will supply bills when they are made available.

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2 15. List any other out-of-pocket expenses not heretofore
3 mentioned that she may claim as a result of this inci-
dent.

4 ANSWER: See answer to Interrogatory No. 14
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10 16. List any sickness, injury or disease suffered since the
11 time of the incident, giving names and addresses of any
and all physicians who have treated her therefore, and
the dates of hospitalization, if any.

12 ANSWER: Objection, vague and ambiguous. Definition of "the
13 time of incident" needed to correctly answer this interrogatory.
14 Without waiving this objection, emotional distress stemming from
15 the injuries listed in the plaintiff's complaint for personal injuries
and damages. This answer may be supplemented once additional
information is gathered.

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18 17. If she has been injured since the time of the incident,
19 set forth the specific details thereof as to how, when,
20 where, and the names and addresses of any other parties
known to her who were involved in this accident.

21 ANSWER: Objection, vague and ambiguous. Definiton of "incident"
22 and "this accident" needed to correctly answer this interrogatory.
23 Without waiving this objection, see plaintiff's complaint for
24 person injuries and damages.
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18. If, since the date of the incident alleged in her Complaint, she has had occasion to make use of any medication, state, if known, the nature of each such medication, the doctor prescribing same, the period during which each such medication was taken, and the approximate amount of money expended to date for the purchase of each such medication so listed.

ANSWER: Objection, vague and ambiguous. Without waiving this objection, none.

19. Has she ever previously made a claim for an injury or been involved in any type of legal proceeding? If so, state the nature of the action, the court or tribunal in which it was filed, the cause number, disposition of the case, and the name, address and telephone number of the attorney who represented her.

ANSWER: No.

1 20. Has she ever made a claim for injuries which did not
2 result in a lawsuit? If so, identify each by stating
3 when, where, the nature of the action, the disposition
4 of the case, and the name, address and telephone number
5 of the attorney who represented her.

6 ANSWER: No.

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9 21. Has she ever been convicted of a crime? If so, please
10 state for each such crime the statutory provision vio-
11 lated, the court in which the case was heard, the type
12 of disposition of the case, the cause number, and the
13 name, address and telephone of the attorney who repre-
14 sented her.

15 ANSWER: No.

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19 22. Furnish the names, addresses, occupations, job designa-
20 tions and present location of any person known to her or
21 her attorneys, as having knowledge of relevant facts
22 pertaining to the above-entitled cause. This request is
23 intended to include all witnesses known to her or her
24 attorneys.

25 ANSWER:

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23. Has she given any written or oral statements to anyone concerning the accident? If so, state the name and address of the person or persons who took each such statement or statements.

ANSWER: Objection, vague and ambiguous. Definition of "the accident" needed to answer interrogatory completely. Without waiving this objection, Shawna has given statements to Dr. Davis, Marc Unger, and KOMO TV.

24. Does she have any photographs of any activity involving the Community Chapel and Bible Training Center?

ANSWER: Yes.

25. Describe her present physical condition with regard to any residual pain or disability which she believes is related to the injuries she received.

ANSWER: Shawna continues to suffer from emotional distress and trauma from the various incidents described in plaintiffs complaint for personal injuries and damages.

1 26. State what her doctors have advised you regarding the
2 necessity of further medical treatment for the injuries
she received.

3 ANSWER: Dr. Davis and Marc Unger advise further counseling.
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8 27. State what her doctors have advised you regarding the
possibility of permanent residual injury.

9 ANSWER: At present the required information is being acquired and
10 compiled pursuant to the discovery process. Although the
11 interrogatory cannot be completed at this early stage of discovery,
as discovery proceeds information will be supplemented.
12

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15 28. Please state the name, address and telephone number of
16 her father.

17 ANSWER:
18 Grant Brian Chabot
19 416 S. 188th
20 Seattle, WA. 98148
21 433-8990
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1 29. Identify each person whom she expects to call as an
2 expert witness at trial, and as to each such person,
please state the following:

3 (a) Name;

4 (b) Address;

5 (c) Telephone number;

6 (d) Occupation;

7 (e) Job classification;

8 (f) Name of employer;

9 (g) Brief resume of professional and/or educa-
tional history and qualifications.

10 ANSWER: Undetermined at this point. To be provided at a later
11 date.

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18 30. Please state the subject matter on which each expert she
19 have listed in answer to the preceding interrogatory is
expected to testify.

20 ANSWER: See answer to Interrogatory No. 29
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1 31. State the substance of the facts and opinions to which
2 each expert in answer to Interrogatory No. 42 is expected
3 to testify.

4 ANSWER: See answer to Interrogatory No. 29.

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9 32. Please state a summary of the grounds for such opinion
10 to which the experts identified in answer to Interrogatory
11 No. 42 are expected to testify.

12 ANSWER: See answer to Interrogatory No. 29

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16 33. With respect to her allegation in paragraph 22.2 of the
17 complaint that defendants made disparaging and false
18 statements in public regarding plaintiffs, please state
19 in detail the contents of each such statement, the
20 identity of the speaker, all members of the public who
21 heard the alleged statement, the date each statement was
22 made, and the location where each such statement was
23 made.

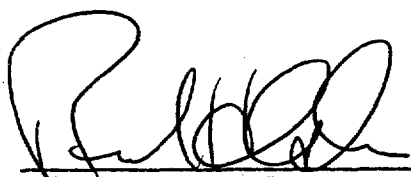
24 ANSWER: The expulsion of Shawna and her family from CCBTC has
25 seperated her from CCBTC friends, father and it has resulted in
her very low self-esteem and emotional problems. Also, remarks
to Shawna's mother being possessed by demons has caused emotional
problems and trauma.

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34. Please identify the name, address and dates of attendance of every church she attended any type of service, whether it be worship service, counseling, education or social meeting since January 1, 1975.

ANSWER: Shawna attended CCBTC, Seattle , WA. three times a week for services lasting in the excess of 4 hours each. She began attending CCBTC's school at K4 and continued thru half of 4th grade.

ANSWERS and RESPONSES to the foregoing INTERROGATORIES and REQUEST FOR PRODUCTION submitted this 28th day of APRIL, 1987.



Richard H. Adler
Of Attorneys for Plaintiffs

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

4 The undersigned (parties to the above-entitled action, or
5 persons authorized to respond on behalf of said parties), being
6 first duly sworn, on oath, depose and say:

7 That they have read the foregoing Interrogatories, Request
8 for Production and the Answers thereto, know the contents thereof,
9 and believe the same to be true.

10 Dee A. Chabot
11 _____
12 _____

13
14 SUBSCRIBED AND SWORN to before me this 28th day of
15 April, 1987

16
17 Carol Ann
18 Notary Public in and for the State of
19 Washington; My commission expires:
20 10-25-89

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

SANDY EHRLICH and MICHAEL
EHRLICH, wife and husband;
LARRY LEMKE, parent; LARRY
LEMKE, Guardian ad Litem on
behalf of SYBIL N. LEMKE, a
minor; KATHRYN REYNOLDS; DEE
CHABOT, parent; DEE CHABOT,
Guardian ad Litem on behalf
of SHAWNA MICHELLE CHABOT,
MICHAEL GRANT CHABOT, NICHOLAS
STERLING CHABOT, minors,

Plaintiffs,

v.

RALPH ALSKOG and ROSEMARY
ALSKOG, husband and wife;
ROBERT HOWERTON and JANE DOE
HOWERTON, husband and wife;
E. SCOTT HARTLEY and JANE DOE
HARTLEY; DONALD LEE BARNETT
and BARBARA BARNETT, husband
and wife; COMMUNITY CHAPEL
AND BIBLE TRAINING CENTER,
a Washington corporation;
"JOHN DOES" 1-4 and "JANE
DOES" 1-4, husbands and wives;
FIRST DOE CORPORATION; and
FIRST DOE PARTNERSHIP,

Defendants.

NO. 86-2-18429-5

INTERROGATORIES AND REQUEST
FOR PRODUCTION DIRECTED TO
PLAINTIFF

TO: DEE CHABOT, as guardian ad litem for NICHOLAS STERLING
CHABOT, Plaintiff; and

TO: RICHARD H. ADLER, Attorney for Plaintiff

LEE, SMART, COOK, MARTIN & PATTERSON, P.S., INC.
ATTORNEYS AT LAW
800 WASHINGTON BUILDING
1325 FOURTH AVENUE
SEATTLE, WASHINGTON 98101
(206) 624-7990

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1 Pursuant to Rule 33 and 34, Civil Rules for Superior Court,
2 you are requested to supply answers to interrogatories and request
3 for production on the following pages. As required by CR 33 and 34,
4 please enter full and complete answers to each and every part in the
5 blank space provided, inserting additional pages where necessary;
6 verify your answers on the form provided after the last interroga-
7 tory; and serve a complete set of the interrogatories, answers and
8 attachments on the undersigned and file the original with the Clerk
9 of the Court within twenty (20) days of receipt hereof.

10 These interrogatories are continuing and require supple-
11 mental answers upon discovery of additional pertinent information
12 [CR 26(e)]. "He" or "his" means Nicholas Chabot.

13 DATED this 24 day of November, 1986.

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

16 By Michael J. Bond
17 Michael J. Bond
Of Attorneys for Defendants

- 18 1. (a) State his full name and address.
19 (b) Has he ever gone under any other name or
20 different spelling of said name? If so, what
21 name or different spelling?
22 (c) State the date and place of his birth.
23 (d) State his Social Security number.

24 ANSWER: a) Nicholas Sterling Chabot , 1230 S. 211th, Seattle, WA.
25 b) no
c) February 13, 1981, Seattle, WA.
d) He has no social security number

1 2. If he has lived in any other part of the United States,
2 name all such other places and dates.

3 ANSWER: N/A

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6 3. List the addresses, with the dates, where he resided
7 during the past ten years.

8 ANSWER: 1230 S. 211th, Seattle, WA. 98198

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11 4. State the month and year he last attended any school,
12 the highest grade or year completed, and the name and
13 location of each such school.

14 ANSWER: Nicholas attends Kindergarten at Des Moines Elementary.

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17 5. List all injuries caused by any accident during his
18 lifetime, stating the place, date and nature.

19 ANSWER: Objection: Ambiguous and vague. Definition of "injuries"
20 and "accident" needed to correctly answer interrogatory. Without
21 waiving this objection, Nicholas has had no serious injuries.

1 6. Has he ever been hospitalized. If so, list the approxi-
2 mate dates, the reasons for the hospitalization, and the
name and address of the hospital.

3 ANSWER: No
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10 7. List any and all sicknesses or diseases suffered during
11 his lifetime, the approximate dates thereof and periods
of disability (omit minor childhood diseases and illnes-
12 ses).

13 ANSWER: Objection: Vague and ambiguous. Definition of "sickness"
14 or "diseases" needed to correctly answer this interrogatory. With-
out waiving this objection, Nicholas has not had any serious sickness
15 or disease.
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19 8. List the names and addresses of all doctors, psychia-
20 trists, psychologists, osteopaths, chiropractors or
21 healers who have treated him the last ten years pre-
ceding the accident, the reason for the treatment, the
22 nature of the treatment, and the approximate dates
thereof.

23 ANSWER: Objection: Vague and ambiguous. Definition of "the
24 accident" needed to correctly answer this interrogatory. Without
waiving this objection, Nicholas has seen Dr. Duncanson, Seattle.
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9. Set forth exactly what injuries he claims he r
a result of this incident.

ANSWER: Objection: vague and ambiguous. Definitic
incident" needed to correctly answer this interrogator
waiving this objection, please see plaintiffs complain
injuries and damages.

10. List the names and addresses of all docto
physical therapists who have treated him from
of the occurrence alleged in his complaint, to

ANSWER: Objection: vague and ambiguous. Definitic
occurrence" needed to properly answer this interrogat
out waiving this objection, Nicholas has not been trea
doctor or physical therapist.

11. List the dates of treatment and/or examinati
doctors and/or physical therapists referred to
response to Interrogatory No. 12.

ANSWER: Objection: Vague. This interrogatory make

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9. Set forth exactly what injuries he claims he received as a result of this incident.

ANSWER: Objection: vague and ambiguous. Definition of "this incident" needed to correctly answer this interrogatory. Without waiving this objection, please see plaintiffs complaint for personal injuries and damages.

10. List the names and addresses of all doctors and/or physical therapists who have treated him from the time of the occurrence alleged in his complaint, to date.

ANSWER: Objection: vague and ambiguous. Definition of "the occurrence" needed to properly answer this interrogatory. Without waiving this objection, Nicholas has not been treated by any doctor or physical therapist.

11. List the dates of treatment and/or examination by the doctors and/or physical therapists referred to by him in response to Interrogatory No. 12.

ANSWER: Objection: Vague. This interrogatory makes no sense.

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5 12. State the nature of the treatment by those doctors
6 and/or physical therapists listed by him in response to
7 Interrogatory No. 12.

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12 ANSWER: See answer to interrogatory No. 11.

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14 13. Was he hospitalized as a result of his claimed injuries?
15 If so, state the dates of hospitalization and where
16 hospitalized.

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18 ANSWER: No

19
20 14. Give an itemization of all hospital and medical expenses
21 incurred by him which she attributes to the incident al-
22 leged in his Complaint.

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24 ANSWER: Objection: Vague and ambiguous. Definition of "the
25 incident" needed to correctly answer this interrogatory. Without
waiving this objection, Nicholas has incurred no medical expenses
as of yet.

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15. List any other out-of-pocket expenses not heretofore mentioned that he may claim as a result of this incident.

ANSWER: See answer to Interrogatory No. 14.

16. List any sickness, injury or disease suffered since the time of the incident, giving names and addresses of any and all physicians who have treated him therefore, and the dates of hospitalization, if any.

ANSWER: Objection: Vague and ambiguous. Definition needed of "the incident" to correctly answer this interrogatory. Without waiving this objection, Nicholas has not seen a physician nor been hospitalized.

17. If he has been injured since the time of the incident, set forth the specific details thereof as to how, when, where, and the names and addresses of any other parties known to him who were involved in this accident.

ANSWER: Objection; vague and ambiguous. Definition needed of "the incident" to correctly answer this interrogatory. Without waiving this objection, the answer is no.

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19. If, since the date of the incident alleged in his complaint, he has had occasion to make use of any medication, state, if known, the nature of each such medication, the doctor prescribing same, the period during which each such medication was taken, and the approximate amount of money expended to date for the purchase of each such medication so listed.

ANSWER: See answer to Interrogatory No. 18

20. Has he ever previously made a claim for an injury or been involved in any type of legal proceeding? If so, state the nature of the action, the court or tribunal in which it was filed, the cause number, disposition of the case, and the name, address and telephone number of the attorney who represented him.

ANSWER: No

1 21. Has he ever made a claim for injuries which did not
2 result in a lawsuit? If so, identify each by stating
3 when, where, the nature of the action, the disposition
of the case, and the name, address and telephone number
of the attorney who represented him.

4 ANSWER: No

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9 22. Has he ever been convicted of a crime? If so, please
10 state for each such crime the statutory provision vio-
11 lated, the court in which the case was heard, the type
12 of disposition of the case, the cause number, and the
name, address and telephone of the attorney who repre-
sented him.

13 ANSWER: No

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19 23. Furnish the names, addresses, occupations, job designa-
20 tions and present location of any person known to him or
21 his attorneys, as having knowledge of relevant facts
22 pertaining to the above-entitled cause. This request is
intended to include all witnesses known to him or his
attorneys.

23 ANSWER: See attached list.

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4 24. Has he given any written or oral statements to anyone
5 concerning the accident? If so, state the name and
6 address of the person or persons who took each such
statement or statements.

7 ANSWER: Objection: vague and ambiguous. Definition needed
8 of " the accident" to correctly answer this interrogatory. With-
9 out waiving this objection, Nicholas has given a statement to
10 Marc Unger and KOMO TV.

11 25. Does he have any photographs of any activity involving
12 the Community Chapel and Bible Training Center?

13 ANSWER: No
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19 26. Describe his present physical condition with regard to
20 any residual pain or disability which he believes is
21 related to the injuries he received.

22 ANSWER: Nicholas continues to suffer from emotional distress
23 and trauma from the various incidents described in Plaintiff's
24 complaint for Personal Injuries and Damages.
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27. State what his doctors have advised you regarding the necessity of further medical treatment for the injuries he received.

ANSWER: My doctor, Dr. Penner feels psychological treatment is necessary.

28. State what his doctors have advised you regarding the possibility of permanent residual injury.

ANSWER: At present the requested information is being acquired and compiled pursuant to the discovery process. Although the interrogatory cannot be completed at this time, as discovery proceeds this information will be supplemented.

29. Please state the name, address and telephone number of his father.

ANSWER: Grant Brian Chabot
416 S. 188th
Seattle, WA. 98148
433-8990

1 30. Identify each person whom he expects to call as an
2 expert witness at trial, and as to each such person,
3 please state the following:

- 4 (a) Name;
- 5 (b) Address;
- 6 (c) Telephone number;
- 7 (d) Occupation;
- 8 (e) Job classification;
- 9 (f) Name of employer;
- 10 (g) Brief resume of professional and/or educa-
- 11 tional history and qualifications.

12 ANSWER: Undetermined at this point. To be provided at a later
13 date.

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18 31. Please state the subject matter on which each expert he
19 have listed in answer to the preceding interrogatory is
20 expected to testify.

21 ANSWER: See answer to Interrogatory No. 30.

1 32. State the substance of the facts and opinions to which
2 each expert in answer to Interrogatory No. 42 is expected
3 to testify.

4 ANSWER: See answer to Interrogatory No. 30.
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9 33. Please state a summary of the grounds for such opinion
10 to which the experts identified in answer to Interrogatory
11 No. 42 are expected to testify.

12 ANSWER: See answer to Interrogatory No. 30.
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16 34. With respect to his allegation in paragraph 22.2 of the
17 complaint that defendants made disparaging and false
18 statements in public regarding plaintiffs, please state
19 in detail the contents of each such statement, the
20 identity of the speaker, all members of the public who
21 heard the alleged statement, the date each statement was
22 made, and the location where each such statement was
23 made.

24 ANSWER: The expulsion of Nicholas and his family from CCBTC
25 has seperated him from his friends and father, and the continued
derogatory comments about his mother being possessed by demons
because she wouldn't submit to CCBTC's counsel has caused Nicholas
emotional problems and trauma.

1
2 35. Please identify the name, address and dates of atten-
3 dance of every church he attended any type of service,
4 whether it be worship service, counseling, education or
5 social meeting since January 1, 1975.

6 ANSWER: Since birth Nicholas has attended CCBTC three times
7 a week, in excess of four hours per session; and attended CCBTC's
8 K4 class for a half of a year. He now will attend church with his
9 mother on occasion.
10

11 ANSWERS and RESPONSES to the foregoing INTERROGATORIES and
12 REQUEST FOR PRODUCTION submitted this 28th day of APRIL,
13 1987.

14
15 
16 _____
17 Richard H. Adler
18 Of Attorneys for Plaintiffs
19
20
21
22
23
24
25

1 STATE OF WASHINGTON)
2 COUNTY OF) ss.

3 The undersigned (parties to the above-entitled action, or
4 persons authorized to respond on behalf of said parties), being
5 first duly sworn, on oath, depose and say:

6 That they have read the foregoing Interrogatories, Request
7 for Production and the Answers thereto, know the contents thereof,
8 and believe the same to be true.

9
10 *Dee A. Chabot*
11
12 _____

13
14 SUBSCRIBED AND SWORN to before me this 28th day of
15 April, 1987

16
17 *Carol A. Truel*
18 Notary Public in and for the State of
19 Washington; My commission expires:
20 10-25-89

21
22
23
24
25 INTERROGS & REQ FOR
PRODUCTION TO PLTF - 15
(DOCINT #1/25 [JPD 7A/16] - 11/10/86)

LEE, SMART, COOK, MARTIN & PATTERSON, P.S., INC.
ATTORNEYS AT LAW
800 WASHINGTON BUILDING
1325 FOURTH AVENUE
SEATTLE, WASHINGTON 98101
(206) 824-7890

SEP 21 1987

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

SANDY EHRLICH and MICHAEL)
EHRLICH, wife and husband;)
LARRY LEMKE, parent; LARRY)
LEMKE, Guardian ad Litem on)
behalf of SYBIL N. LEMKE, a)
minor; KATHRYN REYNOLDS; DEE)
CHABOT, parent; DEE CHABOT,)
Guardian ad Litem on behalf)
of SHAWNA MICHELLE CHABOT,)
MICHAEL GRANT CHABOT, NICHOLAS)
STERLING CHABOT, minors,)

Plaintiffs,

v.

RALPH ALSKOG and ROSEMARY)
ALSKOG, husband and wife;)
ROBERT HOWERTON and JANE DOE)
HOWERTON, husband and wife;)
E. SCOTT HARTLEY and JANE DOE)
HARTLEY; DONALD LEE BARNETT)
and BARBARA BARNETT, husband)
and wife; COMMUNITY CHAPEL)
AND BIBLE TRAINING CENTER,)
a Washington corporation;)
"JOHN DOES" 1-4 and "JANE)
DOES" 1-4, husbands and wives;)
FIRST DOE CORPORATION; and)
FIRST DOE PARTNERSHIP,)

Defendants.

NO. 86-2-18429-5

INTERROGATORIES AND REQUEST
FOR PRODUCTION DIRECTED TO
PLAINTIFF

TO: DEE CHABOT, as guardian ad litem for MICHAEL GRANT CHABOT;
Plaintiff; and

TO: RICHARD H. ADLER, Attorney for Plaintiff

INTERROGS & REQ FOR
PRODUCTION TO PLTF - 1

LEE, SMART, COOK, MARTIN & PATTERSON, P.S., INC.
ATTORNEYS AT LAW
800 WASHINGTON BUILDING
1325 FOURTH AVENUE
SEATTLE, WASHINGTON 98101
(206) 624-7880

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9/1

1 Pursuant to Rule 33 and 34, Civil Rules for Superior Court,
2 you are requested to supply answers to interrogatories and request
3 for production on the following pages. As required by CR 33 and 34,
4 please enter full and complete answers to each and every part in the
5 blank space provided, inserting additional pages where necessary;
6 verify your answers on the form provided after the last interroga-
7 tory; and serve a complete set of the interrogatories, answers and
8 attachments on the undersigned and file the original with the Clerk
9 of the Court within twenty (20) days of receipt hereof.

10 These interrogatories are continuing and require supple-
11 mental answers upon discovery of additional pertinent information
12 [CR 26(e)]. "He" or "his" means Michael Chabot.

13 DATED this 24 day of November, 1986.

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

16 By Michael J. Bond
17 Michael J. Bond
Of Attorneys for Defendants

- 18 1. (a) State his full name and address.
19 (b) Has he ever gone under any other name or
20 different spelling of said name? If so, what
21 name or different spelling?
22 (c) State the date and place of his birth.
23 (d) State his Social Security number.

24 ANSWER:

- 25 a) Michael Grant Chabot, 1230 S. 211th, Seattle, WA. 98198
b) No
c) February 4, 1976, Seattle, WA.
d) He has no social security number

1 2. If he has lived in any other part of the United States,
2 name all such other places and dates.

3 ANSWER: N/A

4
5 3. List the addresses, with the dates, where he resided
6 during the past ten years.

7 ANSWER: 1976- Burien Gardens, Burien, Wa.
8 1977- 301 So. 185th and 10851 6th Ave.S., Seattle,WA.
9 1978- 10851-6th Ave.S. and 1230 S. 211th, Seattle, WA.
10 1978- present- 1230 S. 211th ,Seattle,WA.

11 4. State the month and year he last attended any school,
12 the highest grade or year completed, and the name and
location of each such school.

13 ANSWER: Presently a fifth grader at Des Moines Elementary, Des
14 Moines, WA.

15
16
17 5. List all injuries caused by any accident during his
18 lifetime, stating the place, date and nature.

19 ANSWER: **Objection;** vague and ambiguous. definition of "accident
20 needed to correctly answer interrogatory. Without waiving this
21 objection, Michael had a bike accident in 1981. He injured his nose
22 and was treated at marine View Hospital, Seattle,WA.

1 6. Has he ever been hospitalized. If so, list the approxi-
2 mate dates, the reasons for the hospitalization, and the
name and address of the hospital.

3 ANSWER: No

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10 7. List any and all sicknesses or diseases suffered during
11 his lifetime, the approximate dates thereof and periods
of disability (omit minor childhood diseases and illness-
12 ses).

13 ANSWER: Objection; vague and ambiguous. Definition of "sickness"
and "diseases" needed to correctly answer this interrogatory.

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19 8. List the names and addresses of all doctors, psychia-
20 trists, psychologists, osteopaths, chiropractors or
21 healers who have treated him the last ten years pre-
ceding the accident, the reason for the treatment, the
22 nature of the treatment, and the approximate dates
thereof.

23 ANSWER: Objection; vague and ambiguous. Definition of "the
24 accident" needed to correctly answer this interrogatory. Without
25 waiving this objection, Michael has seen an emergency room doctor
at Marine View Hospital, Dr. Duncanson, Seattle, Dr. Menashe, Dentist
in Des Moines, and Dr. Hallow, Indian Health Center, Seattle.

INTERROGS & REQ FOR
PRODUCTION TO PLTF - 4

LEE, SMART, COOK, MARTIN & PATTERSON, P.S., INC.
ATTORNEYS AT LAW
800 WASHINGTON BUILDING
1325 FOURTH AVENUE
SEATTLE, WASHINGTON 98101
(206) 624-7990

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9. Set forth exactly what injuries he claims he received as a result of this incident.

ANSWER: Objection; vague and ambiguous. Definition of "this incident" needed to correctly answer interrogatory. Without waiving this objection, please see Plaintiff's complaint for person injuries and damages

10. List the names and addresses of all doctors and/or physical therapists who have treated him from the time of the occurrence alleged in his complaint, to date.

ANSWER: Objection; vague and ambiguous. Definition of "the occurrence" needed to correctly answer interrogatory. Without waiving this objection, incidents from the beginning of CCBTC's "spiritual connections" movement to the present, Michael has seen Reed Davis, Ph.D., 12844 Military Rd. S., Seattle, WA. and Dr. Duncanson, Seattle, WA.

11. List the dates of treatment and/or examination by the doctors and/or physical therapists referred to by him in response to Interrogatory No. 12.

ANSWER: Objection; vague. It makes no sense.

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5 12. State the nature of the treatment by those doctors
6 and/or physical therapists listed by him in response to
7 Interrogatory No. 12.

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12 ANSWER:

13 See answer to Interrogatory No.11.
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19 13. Was he hospitalized as a result of his claimed injuries?
20 If so, state the dates of hospitalization and where
21 hospitalized.

22 ANSWER: No.
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14. Give an itemization of all hospital and medical expenses
incurred by him which she attributes to the incident al-
leged in his Complaint.

ANSWER:

Objection; vague and ambiguous. Definition of "this
incident" needed to correctly answer interrogatoy without waiving this
objection. We will supply bills when they are made available.

1
2 15. List any other out-of-pocket expenses not heretofore
3 mentioned that he may claim as a result of this inci-
dent.

4 ANSWER:

5 **Objection;** vague and ambiguous. Definition of "this
6 incident" needed to correctly answer this Interrogatory. Without
7 waiving this objection, other out of pocket expenses will be made
8 available to you as they are incurred.

9
10 16. List any sickness, injury or disease suffered since the
11 time of the incident, giving names and addresses of any
12 and all physicians who have treated him therefore, and
the dates of hospitalization, if any.

13 ANSWER: **Objection;**vague and ambiguous. Definition of "the
14 incident" needed to correctly answer this Interrogatory. Without
15 waiving this objection, Michael has not seen a physician nor
16 hospitalized.

17
18 17. If he has been injured since the time of the incident,
19 set forth the specific details thereof as to how, when,
20 where, and the names and addresses of any other parties
known to him who were involved in this accident.

21 ANSWER: **Objection;** vague and ambiguous. Definition of "incident"
22 and "accident" needed. Without waiving this objection please refer to
23 Plaintiff's complaint for personal injuries and damages.

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19. If, since the date of the incident alleged in his complaint, he has had occasion to make use of any medication, state, if known, the nature of each such medication, the doctor prescribing same, the period during which each such medication was taken, and the approximate amount of money expended to date for the purchase of each such medication so listed.

ANSWER: Objection; vague and ambiguous. Definition of "the incident" needed to correctly answer this Interrogatory. Without waiving this objection, none.

20. Has he ever previously made a claim for an injury or been involved in any type of legal proceeding? If so, state the nature of the action, the court or tribunal in which it was filed, the cause number, disposition of the case, and the name, address and telephone number of the attorney who represented him.

ANSWER: No.

1 21. Has he ever made a claim for injuries which did not
2 result in a lawsuit? If so, identify each by stating
3 when, where, the nature of the action, the disposition
of the case, and the name, address and telephone number
of the attorney who represented him.

4 ANSWER:

5 No.

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9 22. Has he ever been convicted of a crime? If so, please
10 state for each such crime the statutory provision vio-
11 lated, the court in which the case was heard, the type
12 of disposition of the case, the cause number, and the
name, address and telephone of the attorney who repre-
sented him.

13 ANSWER:

14 No.

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19 23. Furnish the names, addresses, occupations, job designa-
20 tions and present location of any person known to him or
21 his attorneys, as having knowledge of relevant facts
intended to include all witnesses known to him or his
22 attorneys.

23 ANSWER:

- 1) Michael & Maureen Sabourin
Seattle, WA
- 2) Mark & Pede Grubbs
Kent, WA
- 3) Detective Larry Daley
Seattle, WA
- 4) Marc Ungar
King County Superior Ct.
W-321 King County Courthouse
Seattle, WA 98104

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4 24. Has he given any written or oral statements to anyone
5 concerning the accident? If so, state the name and
6 address of the person or persons who took each such
7 statement or statements.

8 ANSWER: **Objection;** vague and ambiguous. Definition needed of "the
9 accident" to correctly answer this Interrogatory. Without waiving
10 this objection, Michael has given a statement to Dr. Davis, Marc Ungar
11 and KOMO TV.

12 25. Does he have any photographs of any activity involving
13 the Community Chapel and Bible Training Center?

14 ANSWER: Yes.

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19 26. Describe his present physical condition with regard to
20 any residual pain or disability which he believes is
21 related to the injuries he received.

22 ANSWER: Michael continues to suffer from emotional distress and
23 trauma from the various incidents described in the Plaintiff's
24 complaint for Personal Injuries and Damages.

1
2 27. State what his doctors have advised you regarding the
3 necessity of further medical treatment for the injuries
4 he received.

5 ANSWER:

6 Treatment should continue with Dr. Davis.
7
8

9 28. State what his doctors have advised you regarding the
10 possibility of permanent residual injury.

11 ANSWER:

12 At present the required information is being acquired and
13 compiled pursuant to the discovery process. Although the
14 Interrogatory cannot be completed at this time, as discovery proceeds,
15 this information will be supplemented.
16

17 29. Please state the name, address and telephone number of his
18 father.

19 ANSWER:

20 Grant Brian Chabot
21 416 S. 188th
22 Seattle, WA. 98148
23 433-8990
24
25

1 30. Identify each person whom he expects to call as an
2 expert witness at trial, and as to each such person,
3 please state the following:

4 (a) Name;

5 (b) Address;

6 (c) Telephone number;

7 (d) Occupation;

8 (e) Job classification;

9 (f) Name of employer;

10 (g) Brief resume of professional and/or educa-
11 tional history and qualifications.

12 ANSWER: Undetermined at this point. To be provided at a later
13 date.
14
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16
17

18 31. Please state the subject matter on which each expert he
19 have listed in answer to the preceding interrogatory is
20 expected to testify.

21 ANSWER: See answer to Interrogatory No. 30.
22
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1 32. State the substance of the facts and opinions to which
2 each expert in answer to Interrogatory No. 42 is expected
3 to testify.

4 ANSWER: See answer to Interrogatory No. 30.
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9 33. Please state a summary of the grounds for such opinion
10 to which the experts identified in answer to Interrogatory
11 No. 42 are expected to testify.

12 ANSWER: See answer to Interrogatory No. 30.
13
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15

16 34. With respect to his allegation in paragraph 22.2 of the
17 complaint that defendants made disparaging and false
18 statements in public regarding plaintiffs, please state
19 in detail the contents of each such statement, the
20 identity of the speaker, all members of the public who
21 heard the alleged statement, the date each statement was
22 made, and the location where each such statement was
23 made.

24 ANSWER: The expulsion of Michael and his family from CCBTC has
25 seperated him from his friends and father, and the continued
derogatory comments about his mother being possessed by demons because
she wouldn't submit to CCBTC's church counsel has caused Michael
emotional problems and trauma.

1 STATE OF WASHINGTON)
2 COUNTY OF) ss.

3 The undersigned (parties to the above-entitled action, or
4 persons authorized to respond on behalf of said parties), being
5 first duly sworn, on oath, depose and say:

6 That they have read the foregoing Interrogatories, Request
7 for Production and the Answers thereto, know the contents thereof,
8 and believe the same to be true.

9
10 *Dee A. Chaffin*
11
12 _____

13
14 SUBSCRIBED AND SWORN to before me this *28th* day of
15 *April*, 19*87*.

16
17 *Carol Estlund*
18 Notary Public in and for the State of
19 Washington; My commission expires:
20 *10-25-89*

SEP 24 11:07 AM
SUPERIOR COURT
KING COUNTY

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

SANDY EHRLICH and MICHAEL EHRLICH,)
wife and husband; et al.,)
)
) Plaintiffs,)
)
) v.)
)
RALPH ALSKOG and ROSEMARY ALSKOG,)
husband and wife; et al.,)
)
) Defendants.)

NO. 86-2-18429-5

REQUEST FOR PRODUCTION PROPOUNDED
TO PLAINTIFF DEE CHABOT FOR
HERSELF AND AS GUARDIAN AD
LITEM FOR SHAWNA MICHELLE CHABOT,
MICHAEL GRANT CHABOT and NICHOLAS
STERLING CHABOT

TO: DEE CHABOT, for herself and as Guardian Ad Litem for Shawna Michelle Chabot, Michael Grant Chabot and Nicholas Sterling Chabot, Plaintiff

AND TO: RICHARD H. ADLER, their Attorney

Pursuant to Civil Rule 34, please take notice that defendants request that plaintiff Dee Chabot, for herself and as Guardian Ad Litem for Shawna Michelle Chabot, Michael Grant Chabot and Nicholas Sterling Chabot, produce for examination and inspection, within twenty (20) days after receipt of this request at the offices of said plaintiffs' attorneys, the following items:

REQUEST FOR PRODUCTION NO. 1:

All documents in your possession containing any evidence which relates in any way to the claims asserted in your Complaint for personal Injuries and Damages dated July 31, 1986, including all church bulletins or other written record reflecting the alleged

115
OK

1 disparaging and false statements made about plaintiffs and all
2 photographs of any activity at the defendant chapel.

3 RESPONSE:

4 See attached

5
6
7 DATED this 1 day of June, 1987.

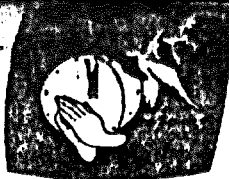
8 LEE, SMART, COOK, MARTIN &
9 PATTERSON, P.S., INC.

10 By Michael J. Bond
11 MICHAEL J. BOND
of Attorneys for Defendants

12 RESPONSES to the foregoing REQUEST FOR PRODUCTION
13 submitted this 20th day of August, 1987.

14 ADLER, GIERSCH & READ

15
16 By [Signature]
17 RICHARD H. ADLER
Attorney for Plaintiffs



Community Chapel & Bible Training Center

18635 8th Avenue South, Seattle, Washington 98148

Pastor Donald Lee Barnett

Phone (206) 431-3100

Sanctuary located at First Avenue South and South 192nd

March 28, 1986

Dee Chabot
1230 South 211th
Seattle, WA 98148

Dear Dee,

This is formal notification that you have been disfellowshipped from this church. It is always with sincere regret that we take such an action. We care deeply for our members; we love all those whom God has sent our way. But the Bible compels us to disfellowship those who are out of step with the church, cause division, are disobedient, or sin willingly and will not cease. Because we believe you fall into one or more of these categories, we must exclude you from all activities of our church. You will not be allowed on church property at any time.

(This is a standard form letter for people in your type of situation; realize that some of the following admonitions may not apply to you.)

We feel we must uphold Bible standards of conduct. It is incumbent upon us to protect our testimony as a church, to prevent harmful precedents from being established, to prevent people from being stumbled, and to protect our church services. Moreover, by disfellowshipping those who are walking contrary to God's Word, we are attempting to help them, specifically by giving them incentive to get right with God.

We believe that you already know the reasons for which you are being disfellowshipped; however, if you would like further clarification, you may call the person who recommended this action, noted below. If you think that you have grounds to appeal this decision, write George Alberts, our Minister of Counseling, explaining why you feel that the matter should be reconsidered; and your request will be directed to the Board of Senior Elders for consideration. Please do not call Pastor Barnett or me or appear at our houses uninvited.

Your attitude and actions toward our church while you are out of fellowship will have a bearing upon your possible future reinstatement. Please accept this decision with a good Christian spirit and do not hurt yourself by becoming bitter and attacking this work of God, or by joining or listening to others who are disobeying the Word of God and becoming accusers. Do not allow hurts to cause you to believe rumors, no matter how many there are or how many people parrot them. Specifically, note Romans 8:33,34 and Matthew 18:17,18.

Know that, in disfellowshipping you, we have in mind not only the

(continued)

Non-denominational Church

Bible College

Christian School

Publications

Dee Chabor


March 28, 1944

well-being of the congregation, but your own ultimate spiritual well-being. Forgiveness by Jesus Christ is available to anyone who truly repents and turns from sin—no matter how long-standing or serious!

If at any time in the future you determine with God's help to turn totally from sin and you feel you are ready to be restored to this church, write a comprehensive letter (addressed to Pastor Barnett) explaining why. Do not call anyone; only a letter will be accepted as your first step toward returning. If your letter gives us reason to think that you are truly ready to return, we will then contact you.

We harbor no ill feelings toward you, and we do not now consider you to be a worthless or hopeless person. It is important that you not view yourself as a "hopeless case." Your life is not over. Jesus still loves you and desires for you to know Him and be a part of His bride in these last days.

Sincerely,

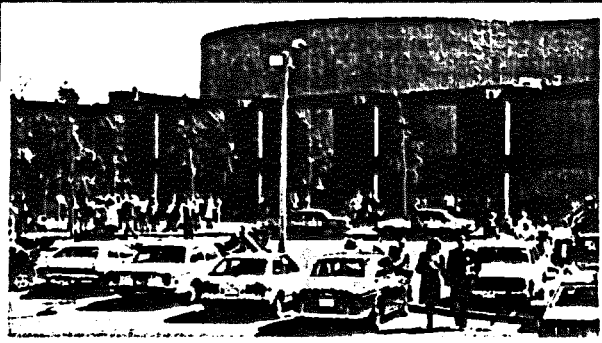


Jack A. Hicks

Vice President and General Manager

This action recommended by Scott Hartley and Ralph Alskog.

JAH/C-L31



Community Chapel & Bible Training Center



Seattle, Washington

Pastor Donald Lee Barnett

Community Chapel and Bible Training Center

Pastor Donald Barnett
 Sunday, March 30, 1986

Office Phone
 431-3100

Ushers' Phone
 431-3160

SUNDAY

East Campus Sunday School Classes	9:30 A.M.
West Campus Sunday School Classes	9:45
Adult Bible Class	10:00
Morning Worship	11:00
Evening Worship	7:00 P.M.

TUESDAY

Worship Meeting (<i>no visitors, please</i>)—Sanctuary	7:00 P.M.
Deliverance Prayer Meeting—rooms S-113 & S-119	7:00

THURSDAY

Worship Meeting (<i>no visitors, please</i>)—Sanctuary	7:00 P.M.
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FRIDAY

Worship Service	7:45 P.M.
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SCHEDULED WEDDING:

Bob Coon and Judy Baglien
 Sat., Apr. 5, 1 P.M. at the Chapel

RECENT WEDDING:

Rick Parton and Kathy Gale

EX-CATHOLICS (and ex-Lutherans, -Episcopalians, and -Presbyterians): Dan O'Brien will lead a deliverance retreat Thu., Apr. 10, 7-9 P.M. in the Chapel (prayer, 7-7:30). Dan has much insight into Catholic practices and ideologies and how they can negatively affect your worship, prayer, spiritual self-worth, marriage, and many other areas of your life. We encourage you to bring your spouse with you. We also encourage deliverance leaders and assistants to attend.

ALL INTERESTED ADULTS ARE INVITED to a presentation on learning disabilities, to be held on Thu., Apr. 17, at 7:30 P.M. in room 702 (East Campus). Topics to be addressed:

- a. How children are screened for learning disabilities and what results mean.
- b. How to overcome learning disabilities.
- c. What you can do at home to compensate for weaknesses and capitalize on strengths.
- d. What about the learning-disabled adult?

A RETREAT FOR INTERCESSORS will be held Wed., Apr. 16, in room E-250, 7-10 P.M. We invite all who have a ministry of intercessory prayer as well as those who feel they are being moved into this ministry. Call the Ministries office (431-3102) for more information.

TAKE A VICARIOUS VACATION TO EUROPE WITH THE PASTOR! Walk the gilded halls of kings! Visit the Wartburg castle where Martin Luther was hidden. The pastor will narrate this fascinating slide-show tour right in our own Sanctuary on Apr. 19, at 7 P.M. Tickets for this event go on sale at the information counter today, and in the church office during the week. Prices: \$1.50 per adult; \$.50 per jr./sr. high student; grade school age and under are admitted free. If you attended this slide show last spring, you may come again this year, free of charge. However, you must go to the information counter or church office to get a ticket, even though you will not have to pay for it. No one will be admitted to the show without a ticket.

NEW IN THE BOOKSTORE AND ON THE BOOKCOUNTERS:

- *Majesty/We Shall Behold Him*, by George Bowker, recorded in our studio, \$4.50 (includes .33 tax).
- *If Only He Knew*, a valuable guide to understanding and knowing your wife, \$6.41 (includes tax).

TITLES OF LAST WEEKEND'S CASSETTES: You are encouraged to check out the tape(s) if you missed any services Mar. 21 or 23, 1986.

Friday evening: *A Crown of Thorns*, Jerry Slaminski
Sunday school: *Winning the Heart of the Groom*, Jerry Slaminski
Sunday morning: *A Friend of the Bridegroom*, Larry Walkemeyer
Sunday evening: no tape

PARENTS OF CHRISTIAN SCHOOL STUDENTS: You may apply for the tuition discount when you re-register your children for the 1986-87 school year. To determine who qualifies, we will consider income, tithes, and offerings for the period from Jan. 1, 1985, through Apr. 20, 1986. (Offerings thereafter will not apply.)

WE REGRET TO ANNOUNCE that Dee Chabot, Steven and Cindy Kuhn, Jill McCullough, Pauleeta Murphy, Kathryn Reynolds, and Marvin and Joy Williams have been put out of the church. (See 2 Th. 3:6,14; 1 Cor. 5:11; Rom. 16:17; Mtt. 18:17; and Tit. 3:10.)

MUSIC AND SERMON TAPES, BOOKS, AND BOOKLETS are for sale on our bookracks in the Sanctuary foyer, and weekdays at the *Community Chapel Bible College Bookstore* at the Chapel. We have screened all items for excellence and accuracy. Also, cassette tapes of all sermons and many studies are available at the check-out windows in the foyer.

OUR CHURCH

THE BIBLE is our only rule of faith, and teaching it is our most important ministry. We are committed to interpret God's holy Word reverently and carefully, in accordance with its own plan, style, and system of revelation. We emphasize both the Word and the Spirit, for the Word without the Spirit leads to legalism, and the Spirit without the Word leads to fanaticism. We believe the Holy Scriptures to be totally inspired by God.

HOLINESS is very important to God; therefore, it is to us, too. "If you love me, keep my commandments," Jesus said (John 14:15). We are sent to teach and baptize, "teaching them to observe all things whatsoever I have commanded you" (Mtt. 28:20). Promiscuity and permissiveness have invaded nearly every part of American life—largely by means of rock music, novels, magazines, movies, and television. Reformation is badly needed to save the church of Jesus. "Back to the Bible and Bible holiness!" is our cry.

FELLOWSHIP WITH OTHER CHRISTIANS— We accept all born-again believers as members of the body of Christ, and we share fellowship on the basis of our common salvation which has been purchased with the blood of Christ.

JESUS IS LORD— We believe that Jesus is and was both God and man; now He is glorified and at the right hand of the Father, having sent the Comforter, the Holy Spirit, into our hearts.

SPIRITUAL GIFTS— We believe in speaking in tongues as the Spirit gives utterance and in all of the gifts and ministries of 1 Corinthians 12 and 14, for the edification of the church. Because we desire only genuine gifts, we permit only those whom we know to have proven gifts to exercise them during services. Ordained ministers of the Gospel who may be visiting us are an exception to this guideline.

SUPPORT OF THE CHURCH— We are constantly reaching more and more people for Christ, necessitating new buildings and expanded ministries. If everyone shoulders his portion of the load, then the high costs are not an undue burden on the few. For this reason, we feel it is necessary for everyone who makes this his church home to support this work financially. "Just how much is needed and reasonable?" many want to know. Our calculations have shown that if everyone gave as much as God required in the Old Testament (ten-percent tithe plus an offering), we would have enough to carry on our ministries adequately.

APPEARANCE— We believe that Christians should dress modestly and conservatively, so as to be clearly set apart from the ungodly and rebellious elements of society. According to God's Word, men are to dress masculinely, and women femininely. We welcome visitors warmly, even if they dress differently than we do; however, those who wish to remain in this church are kindly requested to comply with our "dress and hair standards" as explained in the booklet, "Welcome into the Fellowship," available from an usher.

WE EXTEND YOU A CORDIAL WELCOME.
MAY GOD BLESS YOU.



Sanctuary located on First Avenue South
at South 192nd Street

Offices and Bible College...18635 8th Ave. S., Seattle, WA. 98148



Community Chapel & Bible Training Center

18635 8th Avenue South, Seattle, Washington 98148

Phone (206) 431-3100

Pastor Donald Lee Barnett

Sanctuary located at First Avenue South and South 192nd

March 28, 1986

Dee Chabot
1230 South 211th
Seattle, WA 98148

Dear Dee,

This is formal notification that you have been disfellowshipped from this church. It is always with sincere regret that we take such an action. We care deeply for our members; we love all those whom God has sent our way. But the Bible compels us to disfellowship those who are out of step with the church, cause division, are disobedient, or sin willingly and will not cease. Because we believe you fall into one or more of these categories, we must exclude you from all activities of our church. You will not be allowed on church property at any time.

(This is a standard form letter for people in your type of situation; realize that some of the following admonitions may not apply to you.)

We feel we must uphold Bible standards of conduct. It is incumbent upon us to protect our testimony as a church, to prevent harmful precedents from being established, to prevent people from being stumbled, and to protect our church services. Moreover, by disfellowshipping those who are walking contrary to God's Word, we are attempting to help them, specifically by giving them incentive to get right with God.

We believe that you already know the reasons for which you are being disfellowshipped; however, if you would like further clarification, you may call the person who recommended this action, noted below. If you think that you have grounds to appeal this decision, write George Alberts, our Minister of Counseling, explaining why you feel that the matter should be reconsidered; and your request will be directed to the Board of Senior Elders for consideration. Please do not call Pastor Barnett or me or appear at our houses uninvited.

Your attitude and actions toward our church while you are out of fellowship will have a bearing upon your possible future reinstatement. Please accept this decision with a good Christian spirit and do not hurt yourself by becoming bitter and attacking this work of God, or by joining or listening to others who are disobeying the Word of God and becoming accusers. Do not allow hurts to cause you to believe rumors, no matter how many there are or how many people parrot them. Specifically, note Romans 8:33,34 and Matthew 18:17,18.

Know that, in disfellowshipping you, we have in mind not only the

(continued)

Dee Chabot

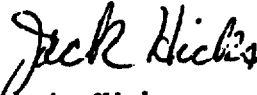
March 28, 1986

well-being of the congregation, but your own ultimate spiritual well-being. Forgiveness by Jesus Christ is available to anyone who truly repents and turns from sin—no matter how long-standing or serious!

If at any time in the future you determine with God's help to turn totally from sin and you feel you are ready to be restored to this church, write a comprehensive letter (addressed to Pastor Barnett) explaining why. Do not call anyone; only a letter will be accepted as your first step toward returning. If your letter gives us reason to think that you are truly ready to return, we will then contact you.

We harbor no ill feelings toward you, and we do not now consider you to be a worthless or hopeless person. It is important that you not view yourself as a "hopeless case." Your life is not over. Jesus still loves you and desires for you to know Him and be a part of His bride in these last days.

Sincerely,



Jack A. Hicks
Vice President and General Manager

This action recommended by Scott Hartley and Ralph Alskog.

JAH/C-L31

RECEIVED

In the Superior Court of the State of Washington,
OCT 05 1987 In and For the County of KING

ORIGINAL

MOREN SANDY EHRLICH and MICHAEL EHRLICH,
LAGESCHULTE & CORNELL, P.S.
et al.,

Plaintiff

v.

RALPH ALSKOG, et ux.,
et al.,

Defendant

No. 86-2-18429-5
AMENDED
NOTICE OF ORAL EXAMINATION
BEFORE TRIAL

(Previously set for September 25, 1987)

YAMAGUCHI & ASSOCIATES
COURT REPORTERS
DATE 10/6

To: All Parties of Record

and to: Their Respective Counsel

YOU, AND EACH OF YOU, WILL PLEASE TAKE NOTICE that the testimony of
SANDY EHRLICH, the plaintiff above named will be
taken on Oral Examination Before Trial at the instance and request of the defendants in the
above entitled and numbered action, before Ernest H. Yamaguchi, Notary Public, or some other
Notary Public at 800 Washington Building, Fourth & Union Street,
Seattle, Washington, on Thursday, the 10th day of December,
19 87, commencing at the hour of 9:30 o'clock, A M., on that day; the said Oral Examination
of said witness at said time and place to be subject to continuance or adjournment from time to time
or place to place until completed.

This testimony upon oral examination will be taken on the ground and for the reason the said person
is a party to or a witness in the above entitled action, and will give evidence material to the establishment
of the defendants' case.

DATED this 2nd day of October, 19 87.

Michael J. Bond
MICHAEL J. BOND
Attorneys for Defendants

Office and Post Office Address:
800 Washington Building
Seattle, Washington.

624-7990

YAMAGUCHI & ASSOCIATES
Court Reporters
408 Central Building
Seattle, WA 98104
206-622-6875

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RECEIVED

In the Superior Court of the State of Washington,

OCT 05 1987

In and For the County of KING

ORIGINAL

MOREN,
LAGESCHULTE & CORNELL, P.S.

SANDY EHRLICH and MICHAEL EHRLICH,
et al.,

Plaintiff

v.

RALPH ALSKOG, et ux.,
et al.,

Defendant

No. 86-2-18429-5
AMENDED
NOTICE OF ORAL EXAMINATION

BEFORE TRIAL

(Previously set for September
25, 1987)

To: All Parties of Record

YAMAGUCHI & ASSOC.
COURT REPORTERS
DATE 10/6

and to: Their Respective Counsel

YOU, AND EACH OF YOU, WILL PLEASE TAKE NOTICE that the testimony of

MICHAEL EHRLICH

, the plaintiff above named will be

taken on Oral Examination Before Trial at the instance and request of the defendants in the above entitled and numbered action, before Ernest H. Yamaguchi, Notary Public, or some other Notary Public at 800 Washington Building, Fourth & Union Street, Seattle, Washington, on Thursday, the 10th day of December, 19 87, commencing at the hour of _____ o'clock, _____ M., on that day; the said Oral Examination of said witness at said time and place to be subject to continuance or adjournment from time to time or place to place until completed.

This testimony upon oral examination will be taken on the ground and for the reason the said person is a party to or a witness in the above entitled action, and will give evidence material to the establishment of the defendants' case.

DATED this 2nd day of October, 19 87.

Michael J. Bond
MICHAEL J. BOND

Attorneys for Defendants

Office and Post Office Address:

800 Washington Building
Seattle, Washington.

624-7990

YAMAGUCHI & ASSOCIATES
Court Reporters
408 Central Building
Seattle, WA 98104
206-622-6875

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

SANDY EHRlich et al.)
)
 Plaintiff,)
 v.)
RALPH ALSKOG et al.)
)
 Defendants.)

NO. 86-2-18429-5

DECLARATION OF
RICHARD H. ADLER
SUPPORT OF MOTION FOR
PREASSIGNMENT

MOREN,
LAGESCHULTE & CORNELL, P.C.

I am one of the attorneys of record for plaintiffs in the above-entitled case.

PREASSIGNMENT

I am requesting preassignment of the above-entitled action, pursuant to Local Rule 40(b)(2) which sets forth several criterion in evaluating such a request including:

i. Expected Length of Trial: 3-5 weeks

ii. Number of parties and attorneys involved: 8 Plaintiffs, 5 Defendants. Two law firms represent Plaintiffs; two separate law firms represent Defendants.

iii. Estimated number, nature and length of pre-trial hearings: It is anticipated there will be numerous pre-trial motions involving request for discovery, attorney/client privileges, alleged first amendment privileges.

iv. Agreement of parties to preassignment: It is anticipated that the defense is opposed to preassignment.

DECLARATION OF
RICHARD H. ADLER

LAW OFFICES OF
ADLER, GERSCH AND READ, P.S.
1621 SMITH TOWER
SEATTLE, WA 98104
(206) 682-4267

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2 Extraordinary Features: In addition to the number of parties
3 and number of counsel involved, this case involves the much
4 publicized Community Chapel and Bible Training Center, it's
5 pastor, leaders, and members. See attached. It was anticipated
6 that there will be numerous pre-trial motions throughout the
7 discovery process (there has already been two separate motions
8 to compel discovery) and it will be best if one particular Judge
9 could become educated and acquainted with the various causes of
10 action, Defendants and Plaintiffs as the case develops.
11 Additionally, if the matter was preassigned we would
12 specifically be asking a Judge to set up a discovery time table
13 so that discovery can proceed and be monitored regularly by the
14 Superior Court.

9 EARLY TRIAL DATE

10 Plaintiffs are also seeking an early trial date within
11 the next 10 to 14 months. The need of an early trial date
12 arises from several facts including:

13 1. Plaintiffs were former members of Defendant
14 church, Community Chapel Bible Training Center, which had a
15 world view doctrine that its members were to have contact only
16 with other members of the church, children of members were to
17 attend the Community Chapel Bible Training Center school,
18 members and children were to attend regular and frequent
19 religious services and social events, members were to socialize
20 only with other members, people earn their livelihood either for
21 working for the church or getting referrals from members of the
22 church to perform work or were housewives/mothers.

23 2. Church officials, through the Community Chapel and
24 Bible Training Center, encourage members of its congregations to
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28 DECLARATION OF
RICHARD H. ADLER

-2-

LAW OFFICES OF
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2 form intimate attachments with members of the opposite sex as
3 part of regular services at the church. These intimate
4 attachments were incurred with persons other than the spouses of
5 the members. These intimate attachments have been called
6 "spiritual connections".

7 3. When Plaintiff challenge the "spiritual
8 connection" doctrine they were "disfellowshipped".
9 Disfellowshipments that you are publicly condemned in a CCBTC
10 bulletin circulated to its members. This means you would lose
11 contact with all of your friends and support group over the
12 years. People lost their livelihood. People lost everything.

13 4. Several of the Plaintiffs became clinically
14 depressed and sought treatment. Some contemplated suicide.

15 5. Plaintiffs are in need of on-going treatment,
16 however, rehabilitation requires monies which they do not have.
17 Plaintiffs need their day in court so that they will have
18 sufficient funds to begin the long road of rehabilitation and
19 counseling.

20 6. Another reason for an early trial date comes from
21 the endless human tragedies that keep cropping up at the
22 church's doors. Recently, this court is aware of three church
23 officials who have been found guilty (two by two separate judges
24 and one by a jury) for failing to report sexual abusive
25 children. The court may also recall one member, Janet Cole,
26 drowning her daughter as a result of depression and suicide
27 arising from the spiritual connections move. Other members have

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DECLARATION OF
RICHARD H. ADLER

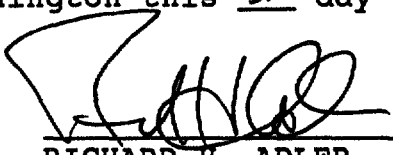
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2 abused their children or step-children and have been found
3 guilty by juries in King County. Numerous divorces have been
4 commenced in King County. The human tragedies are endless and
5 will continue as long as the church and its leadership are
6 allowed to proceed and not held accountable for their abusive
7 actions.

8 7. There is also a concern among Plaintiffs counsel
9 about the dissipation of assets by Defendants. If a judgment is
10 entered against Defendants it is anticipated to be similar to
11 those judgments reached around the county against cult type
12 church organizations. These judgments have been coming in
13 excess of a million dollars.

14 8. Granting an early trial date within the next 10 to
15 14 months will not prejudice Defendants because this will allow
16 sufficient time to prepare this case for trial. Additionally,
17 if this matter is preassigned and an early trial date is
18 granted, discovery can be set out according to a specific time
19 table established and agreed upon by the parties and the
20 designated Superior Court judge.

21 I DECLARE UNDER PENALTY OF PERJURY UNDER THE LAWS OF
22 THE STATE OF WASHINGTON THAT THE FOREGOING IS TRUE AND CORRECT
23 TO THE BEST OF MY KNOWLEDGE AND ABILITY.

24 DATED at Seattle, Washington this 31 day of October,
25 1987.

26 
27 RICHARD H. ADLER
Attorney for Plaintiffs

28 DECLARATION OF
RICHARD H. ADLER

-4-

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(206) 682-4267

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MOREN,
LAGESCHULTE & CORNELL, P.S.

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

SANDY EHRlich et al)
)
) Plaintiffs,)
) v.)
) RALPH ALSKOG et al.)
)
) Defendants.)

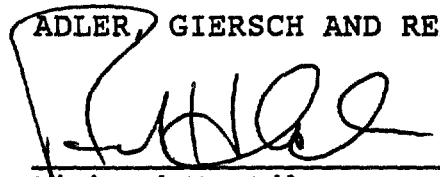
NO. 86-2-18429-5
MOTION FOR CONSOLIDATION
OF CAUSE NUMBERS 86-2-18429-5
AND 86-2-18176-8

COMES NOW the Plaintiffs, by and through their attorney of record, Richard H. Adler of Adler, Giersch and Read P.S., and John Messina of Messina, Duffy, and respectfully moves this court for an Order consolidating cause number 86-2-18176-8 and cause number 86-2-18176-8, for pre-trial and trial purposes since both actions involve similar and related questions of law and fact presently pending before the court, consolidation would tend to avoid unnecessary costs and delays for the litigants and would save the court needless expenditure of time and money.

This motion is based upon the files and records herein and the attached Declaration of Counsel.

DATED this 31st day of October, 1987.

Respectfully submitted,
ADLER, GIERSCH AND READ, P.S.


Richard H. Adler
Attorney for Plaintiffs

MOTION FOR CONSOLIDATION
(ehrlsali/d:1)

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

SANDY EHRLICH et al.

Plaintiffs,

v.

RALPH ALSKOG et al.

Defendants.

SEAL
NO. 86-2-18429-5
MORAN, LAGESCHULTE & CORNELL, P.S.

DECLARATION AND
MEMORANDUM OF COUNSEL
IN SUPPORT OF MOTION
FOR CONSOLIDATION

I am one of the attorneys of record in the above-entitled case representing Plaintiffs and am competent and willing to testify to the following facts and circumstances.

I. RELIEF REQUEST

CONSOLIDATION OF THE ABOVE-ENTITLED CAUSE NO. 86-2-18429-5 WITH KING COUNTY CAUSE NO. 86-2-18176-8

LAW ON CONSOLIDITION

Civil Rule 42(a) provides:

"Consolidation. When actions involving a common question of law or fact or pending before the court, it may order a joint hearing or trial of any or all the matters and issue in the action; it may order all the actions consolidated; and it may make such orders concerning proceedings therein as may tend to avoid unnecessary costs or delay."

Civil Rule 42 confers broad power on the trial court to consolidate causes for trial in order to facilitate administration of justice, Sage v. Northern Pacific Railroad

DECLARATION & MEMORANDUM OF
COUNSEL IN SUPPORT OF MOTION
FOR CONSOLIDATION
(ehrlsali/d:1)

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SEATTLE, WA 98104
(206) 682-4267

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2 Company, 62 Wn.2d 6, 380 P.2d, 856 (1963); Slitpern v. Briggs,
3 66 Wn.2d 1, 342 P.2d 229, 401 P.2d 216 (1964); Hawley v. Mellem,
4 66 Wn.2d 765, 405 P.2d 243 (1965); Blake v. Farrell Lines, Inc.,
5 417 F.2d 264 (cir. 1969).

6 III. FACTS JUSTIFYING CONSOLIDATION

7 1. King County Cause No. 86-2-18429-5 and
8 86-2-18176-8 were both filed prior to the changes becoming
9 effective in the 1986 Tort Reform Act.

10 2. Both actions are similar in nature and involve
11 common questions of law and fact. The basis of both lawsuits
12 involve Pastor Donald Barnett and the Community Chapel and Bible
13 Training Center, who have encouraged members of its congregation
14 to form intimate attachments with members of the opposite sex as
15 part of regular services at the church. These intimate
16 attachments are encouraged with persons other than the spouses
17 of the members. These intimate attachments have been dubbed a
18 revelation known as "spiritual connections".

19 3. Both lawsuits involve the sexual exploitation and
20 abuse of members of the congregation caused by either the pastor
21 or agents of the church. In Cause No. 86-2-18429-5, the sexual
22 exploitation and abuse was caused by a church elder (Defendant
23 Ralph Alskog) against another church member who is not his
24 spouse (Plaintiff Sandy Ehrlich). In the same lawsuit, there is
25 a church counselor, Defendant Robert Howerton, who attempted to
26 sexually exploit and abuse Sybil Lemke, a 14 year old. In Cause

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28 DECLARATION & MEMORANDUM OF
COUNSEL IN SUPPORT OF MOTION
FOR CONSOLIDATION
(ehrlsali/d:1)

-2-

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No. 86-2-18176-8, sexual exploitation and abuse occur by Pastor Barnett himself against three different women of the congregation.

4. Both lawsuits involve similar torts such as:

- (a) assault and battery;
- (b) outrage;
- (c) ministerial and pastoral malpractice;
- (d) counselor malpractice;
- (e) negligent counseling;
- (f) wrongful disfellowshipment;
- (g) loss of consortium;
- (h) destruction of parent/child relationship;
- (i) defamation.

See Exhibit A and B, copies of the respective Complaints.

5. Both legal actions have similar Defendants, i.e. the Community Chapel and Bible Training Center, a Washington corporation. Additionally, both actions seek to have official agents of the church held accountable for their behaviors and conduct. This will be common questions of fact concerning cults, mind control and the "spiritual connections" teachings.

6. Community Chapel and Bible Training Center has attracted much attention from the visual and print media in King County. See Exhibit C. It is anticipated that these matters

DECLARATION & MEMORANDUM OF
COUNSEL IN SUPPORT OF MOTION
FOR CONSOLIDATION
(ehrlsali/d:1)

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2 will be intensively litigated and reported to the public.
3 Consolidation, will also assist the court in the proper use and
4 expenditure of time and money. For example, the overlap of lay
5 and expert testimony will not be repeated. Moreover, discovery
6 can be coordinated thereby reducing litigant's expenses, and
7 attorney time.

8 I DECLARE UNDER PENALTY OF PERJURY UNDER THE LAWS OF
9 THE STATE OF WASHINGTON THAT THE FOREGOING IS TRUE AND CORRECT
10 TO THE BEST OF MY KNOWLEDGE AND ABILITY.

11 DATED at Seattle, Washington this 31st day
12 of October, 1987.

13 
14 _____
15 Richard H. Adler
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28 DECLARATION & MEMORANDUM OF
COUNSEL IN SUPPORT OF MOTION
FOR CONSOLIDATION
(ehrlsali/d:1)

SECRET A

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

SANDY EHRLICH and MICHAEL EHRLICH,)
wife and husband; LARRY LEMKE,)
parent; LARRY LEMKE, Guardian ad)
Litem on behalf of SYBIL N. LEMKE,)
a minor; KATHRYN REYNOLDS; DEE)
CHABOT, parent; DEE CHABOT,)
Guardian ad Litem on behalf of)
SHAWNA MICHELLE CHABOT, MICHAEL)
GRANT CHABOT, NICHOLAS STERLING)
CHABOT, minors,)

Plaintiffs,

v.

RALPH ALSKOG and ROSEMARY ALSKOG,)
husband and wife; ROBERT HOWERTON)
and JANE DOE HOWERTON, husband)
and wife; E. SCOTT HARTLEY and)
JANE DOE HARTLEY; DONALD LEE)
BARNETT and BARBARA BARNETT,)
husband and wife; COMMUNITY CHAPEL)
AND BIBLE TRAINING CENTER, a)
Washington Corporation; "JOHN)
DOES" 1-4 and "JANE DOES" 1-4,)
husbands and wives; FIRST DOE)
CORPORATION; and FIRST DOE)
PARTNERSHIP,)

Defendants.

86-2-18429 5
SUMMONS FOR
COMPLAINT FOR PERSONAL
INJURIES AND DAMAGES

TO THE DEFENDANTS ABOVE-NAMED

A lawsuit has been started against you in the above-entitled court by the above-named plaintiff. Plaintiff's claims are stated in the written complaint, a copy of which is served upon you with this summons.

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

SANDY EHRLICH and MICHAEL EHRLICH,)
wife and husband; LARRY LEMKE,)
parent; LARRY LEMKE, Guardian ad)
Litem on behalf of SYBIL N. LEMKE,)
a minor; KATHRYN REYNOLDS; DEE)
CHABOT, parent; DEE CHABOT,)
Guardian ad Litem on behalf of)
SHAWNA MICHELLE CHABOT, MICHAEL)
GRANT CHABOT, NICHOLAS STERLING)
CHABOT, minors,)

Plaintiffs,

v.

RALPH ALSKOG and ROSEMARY ALSKOG,)
husband and wife; ROBERT HOWERTON)
and JANE DOE HOWERTON, husband)
and wife; E. SCOTT HARTLEY and)
JANE DOE HARTLEY; DONALD LEE)
BARNETT and BARBARA BARNETT,)
husband and wife; COMMUNITY CHAPEL)
AND BIBLE TRAINING CENTER, a)
Washington Corporation; "JOHN)
DOES" 1-4 and "JANE DOES" 1-4,)
husbands and wives; FIRST DOE)
CORPORATION; and FIRST DOE)
PARTNERSHIP,)

Defendants.

NO. 86-2-18429-5

SUMMONS FOR
COMPLAINT FOR PERSONAL
INJURIES AND DAMAGES

FILED
JUN 11 1986
CLERK OF SUPERIOR COURT
KING COUNTY
SEATTLE, WASHINGTON

TO THE DEFENDANTS ABOVE-NAMED

A lawsuit has been started against you in the above-entitled court by the above-named plaintiff. Plaintiff's claims are stated in the written complaint, a copy of which is served upon you with this summons.

1 In order to defend against this lawsuit, you must
2 respond to the complaint by stating your defense in writing, and
3 serve a copy upon the undersigned attorney for the plaintiff
4 within 20 days after the service of this summons, excluding the
5 date of service, or a default judgment may be entered against
6 you without notice. A default judgment is one where the
7 plaintiff(s) are entitled to what they ask for because you have
8 not responded. If you serve a notice of appearance on the
9 undersigned attorney, you are entitled to notice before a
10 default judgment may be entered.

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

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

20 If you are the parent of a child named as a party in
21 this lawsuit you are receiving notice of this claim pursuant to
22 RCW 4.24.010.

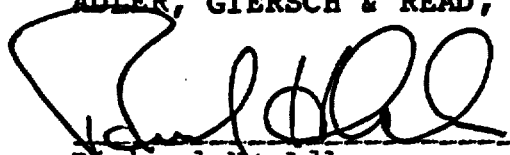
23 If you are the parent of a child named as a party/
24 plaintiff in this lawsuit you must join as a party/plaintiff to
25 the suit within twenty (20) days or your right to recover
26 damages under RCW 4.24.010 will be barred.
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This summons is issued pursuant to Rule 4 of the Superior Court Civil Rules of the State of Washington.

Dated this 31st day of July, 1986.

ADLER, GIERSCH & READ,



Richard H. Adler
Attorney for Plaintiff

File Response with:

Serve a Copy of your Response on:

Clerk of the Court
King County Courthouse
3rd and James
Seattle, WA 98104

Richard H. Adler
Adler, Giersch & Read
1211 Smith Tower
Seattle, WA 98104

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

SANDY EHRLICH and MICHAEL EHRLICH,)
wife and husband; LARRY LEMKE,)
parent; LARRY LEMKE, Guardian ad)
Litem on behalf of SYBIL N. LEMKE,)
a minor; KATHRYN REYNOLDS; DEE)
CHABOT, parent; DEE CHABOT,)
Guardian ad Litem on behalf of)
SHAWNA MICHELLE CHABOT, MICHAEL)
GRANT CHABOT, NICHOLAS STERLING)
CHABOT, minors,)

Plaintiffs,

v.

RALPH ALSKOG and ROSEMARY ALSKOG,)
husband and wife; ROBERT HOWERTON)
and JANE DOE HOWERTON, husband)
and wife; E. SCOTT HARTLEY and)
JANE DOE HARTLEY; DONALD LEE)
BARNETT and BARBARA BARNETT,)
husband and wife; COMMUNITY CHAPEL)
AND BIBLE TRAINING CENTER, a)
Washington Corporation; "JOHN)
DOES" 1-4 and "JANE DOES" 1-4,)
husbands and wives; FIRST DOE)
CORPORATION; and FIRST DOE)
PARTNERSHIP,)

Defendants.

86-2-18429 5

NO.

COMPLAINT FOR PERSONAL
INJURIES AND DAMAGES

COME NOW the Plaintiffs, by and through their attorneys
of record, Richard H. Adler of ADLER, GIERSCH & READ, P.S., and
for cause of action against the Defendants state and allege as
follows:

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I. PLAINTIFFS

1.1 The Plaintiffs Sandy Ehrlich and Michael Ehrlich, are wife and husband, and at all times material hereto Plaintiffs were residents of the County of King, State of Washington.

1.2 Plaintiff Larry Lemke, father of Sybil N. Lemke, at all times material hereto was a resident of the County of King, State of Washington.

1.3 Plaintiff Sybil N. Lemke is a minor child, fourteen years of age, who resides with her father, Larry Lemke, in the County of King, State of Washington. Larry Lemke has been duly appointed the Guardian ad Litem of Plaintiff, Sybil N. Lemke, for purposes of this litigation. At all times material hereto, Plaintiff Sybil N. Lemke was a resident of the County of King, State of Washington.

1.4 Plaintiff, Kathryn Reynolds, at all times material hereto was a resident of the County of King, State of Washington.

1.5 Plaintiff, Dee Chabot, mother of Shawna Michelle Chabot, Michael Grant Chabot and Nicholas Sterling Chabot, at all times material hereto was a resident of the County of King, State of Washington.

1.6 Plaintiffs, Shawna Michele Chabot is a minor, eleven years of age; Michael Grant Chabot is a minor, ten years of age; and Nicholas Sterling Chabot is a minor, five years of age; Plaintiffs reside with their mother, Dee Chabot, in the County of King, State of Washington. Dee Chabot has been duly

1 appointed the Guardian ad Litem of Plaintiff, Shawna Michele
2 Chayot, Michael Grant Chabot, and Nicholas Sterling Chabot for
3 purposes of this litigation.

4 II. DEFENDANTS: RALPH AND ROSEMARY ALSKOG

5 2.1 The Defendants, Ralph Alskog and Rosemary Alskog,
6 are husband and wife, and at all times material hereto were
7 residents of the County of King, State of Washington.

8 2.2 Defendant Ralph Alskog is and at all times
9 material hereto was the Assistant to the Vice President of the
10 Defendant, Community Chapel and Bible Training Center.

11 2.3 Defendant Ralph Alskog is and at all times
12 material hereto was one of the deacons of the Defendant,
13 Community Chapel and Bible Training Center.

14 2.4 Defendant Ralph Alskog served as a counselor for
15 the Defendant, Community Chapel and Bible Training Center.

16 2.5 All actions described of Defendants Alskog or
17 either of them were performed on behalf of the marital
18 community.

19 III. DEFENDANTS: ROBERT AND JANE DOE HOWERTON

20 3.1 The Defendants, Robert Howerton and Jane Doe
21 Howerton, are husband and wife, and at all times material hereto
22 were residents of the County of King, State of Washington.
23 Plaintiffs do not know if Defendant Howerton is married, and if
24 married, does not know his spouse's name, but alleges that if he
25 is married, this constitutes a marital community under the laws
26 of the State of Washington. Each of the acts complained of were
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1 done for and on behalf of the community as well as for and on
2 behalf of the individuals.

3 3.2 Defendant Robert Howerton is a member of the
4 congregation of the Defendant, Community Chapel and Bible
5 Training Center.

6 3.3 Defendant Robert Howerton has taught Sunday School
7 for the Defendant, Community Chapel and Bible Training Center.

8 3.4 Defendant Robert Howerton has held himself out as
9 a counselor and served as a counselor for the Defendant,
10 Community Chapel and Bible Training Center.

11 3.5 Defendant Robert Howerton acted as a counselor for
12 Plaintiff Sybil N. Lemke.

13 IV. DEFENDANTS: E. SCOTT AND JANE DOE HARTLEY

14 4.1 The Defendants, E. Scott Hartley and Jane Doe
15 Hartley, are husband and wife, and at all times material hereto
16 were residents of the County of King, State of Washington.

17 4.2 Defendant E. Scott Hartley is and at all times
18 material hereto has been the corporate secretary and senior
19 staff assistant to the vice president of the Defendant,
20 Community Chapel and Bible Training Center.

21 4.3 Defendant E. Scott Hartley is recognized as one of
22 the four individuals on the Board of Senior Elders of the
23 Defendant, Community Chapel and Bible Training Center.

24 4.4 Defendant E. Scott Hartley served as a counselor
25 for the Defendant, Community Chapel and Bible Training Center.

26 4.5 All actions described of these defendants or either
27 of them were performed on behalf of the marital community.
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1 V. DEFENDANTS: DONALD LEE AND BARBARA BARNETT

2 5.1 The Defendants, Donald Lee Barnett and Barbara
3 Barnett, are husband and wife, and at all times material hereto
4 were residents of the County of King, State of Washington.

5 5.2 Defendant Donald Lee Barnett is the head pastor of
6 the Defendant, Community Chapel and Bible Training Center and as
7 such is responsible for the administration and direction of the
8 entire congregation.

9 5.3 Defendant Donald Lee Barnett is also the president
10 of the Defendant, Community Chapel and Bible Training Center.

11 5.4 Defendant Barbara Barnett, at all times material
12 hereto, served as a counselor for the Community Chapel and Bible
13 Training Center.

14 5.5 All actions described of these defendants or
15 either of them were performed on behalf of the marital
16 community.

17 VI. DEFENDANT: COMMUNITY CHAPEL AND BIBLE TRAINING CENTER

18 6.1 Defendant Community Chapel and Bible Training
19 Center is a corporation licensed to do business and doing
20 business in the State of Washington, having its principle place
21 of business at 18635 Eighth Avenue South, Seattle, Washington.

22 VII. DEFENDANTS: JOHN AND JANE DOES

23 7.1 John and Jane Does 1-4 are residents of the State
24 of Washington. All actions described of these defendants or
25 either of them were performed on behalf of the marital
26 community.
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1 VIII. DEFENDANTS: FIRST DOE CORPORATION AND PARTNERSHIP

2 8.1 The Defendants First Doe Corporation and First Doe
3 Partnership are business entities doing business or controlled
4 by the Defendant, Community Chapel and Bible Training Center.
5 Plaintiffs pray leave to amend this complaint for personal
6 injuries and damages and to insert herein their true names when
7 they become known.

8 IX. JURISDICTION

9 9.1 All acts hereinafter alleged occurred within the
10 County of King, State of Washington, and this court has
11 jurisdiction over the subject matter herein and the parties
12 hereto.

13 X. AGENTS, AGENCY AND RESPONDEAT SUPERIOR

14 10.1 At all times material hereto, the Defendants,
15 Ralph Alskog, Rosemary Alskog, Robert Howerton, Jane Doe
16 Howerton, E. Scott Hartley, Jane Doe Hartley, Donald Lee
17 Barnett, Barbara Barnett, "John Does" 1-4 and "Jane Does" 1-4,
18 were principles, agents, employees and representatives of the
19 Community Chapel and Bible Training Center and all actions
20 complained of herein were performed in the scope of their
21 representation, employment and/or agency for the Defendant,
22 Community Chapel and Bible Training Center.

23 10.2 At all times material hereto, the Defendants,
24 First Doe Corporation and First Doe Partnership, were agents,
25 employees and/or representatives of the Defendant, Community
26 Chapel and Bible Training Center and all actions complained of
27 herein were performed in the course of their representation,
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1 employment and/or agency for the Defendant, Community Chapel and
2 Bible Training Center.

3 XI. BASIS

4 11.1 Sometime during the year of 1967, the Defendant,
5 Community Chapel and Bible Training Center was organized under
6 the laws of the State of Washington as a corporation, practicing
7 fundamentalist pentacostal beliefs. Beginning in 1984 or 1985,
8 Defendant, Community Chapel and Bible Training Center, by and
9 through its pastor and president, Defendant Donald Lee Barnett,
10 encouraged and/or required members of the congregation to form
11 intimate attachments with members of the opposite sex without
12 regard to the member's spouse as part of the regular services at
13 the Community Chapel and Bible Training Center. Said intimate
14 attachments were called "spiritual connections." "Spiritual
15 connections" involve dancing together, embracing, holding hands,
16 hypnotically gazing into each other's eyes, kissing, and/or
17 sexual contact.

18 11.2 Plaintiffs were members of the Defendant the
19 Community Chapel and Bible Training Center religious
20 organization.

21 11.3 Defendant the Community Chapel and Bible Training
22 Center, by and through its pastor, Defendant Donald Lee Barnett,
23 knew or should have known that these intimate attachments and
24 "spiritual connections" would result in seductions, family
25 disharmony, marital instability, separation and/or dissolution
26 of marriages, sexual involvement and advances of adults with
27 children, loss of consortium, destruction of the parent-child
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1 relationship, loss of guidance, support, love and companionship
2 for children.

3 11.4 Defendant, Community Chapel and Bible Training
4 Center, by and through its pastor and president, Defendant
5 Donald Lee Barnett, knew or should have known that its officers,
6 agents, employees, representatives, counselors, and members of
7 the congregation would follow his direction and/or example.

8 XII.

9 12.1 Plaintiffs, Sandy Ehrlich and Michael Ehrlich,
10 regularly attended services at the Defendant, Community Chapel
11 and Bible Training Center for over ten years. As members of the
12 congregation, Plaintiffs attended numerous functions, and were
13 active participants in the congregation. Plaintiff Michael
14 Ehrlich was a bible school teacher employed by the Defendant,
15 Community Chapel and Bible Training Center. Plaintiff Michael
16 Ehrlich held a position as one of the ministerial elders of the
17 Defendant, Community Chapel and Bible Training Center. The
18 Plaintiffs, Sandy Ehrlich and Michael Ehrlich, tithed a portion
19 of their income to the Defendant, Community Chapel and Bible
20 Training Center to help sustain it. The Plaintiffs often
21 volunteered their time to the Defendant, Community Chapel and
22 Bible Training Center. The Plaintiffs' entire life revolved
23 around the activities of the Defendant, Community Chapel and
24 Bible Training Center.

25 12.2 On several occasions, Defendant Ralph Alskog,
26 under the guise of providing ministerial services and counseling
27 as well as serving as Plaintiff Sandy Ehrlich's "spiritual
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1 connection," manipulated, exploited, coerced, influenced and
2 pressured her into having sexual contact with him. Defendant
3 Ralph Alskog professed to be driven by God and represented to
4 Plaintiff Sandy Ehrlich that his conduct was sanctioned by God.

5 12.3 For a period of approximately one year, Defendant
6 Ralph Alskog continued to seek out Plaintiff Sandy Ehrlich,
7 under the guise of being her "spiritual connection," and
8 providing her with ministerial counsel and guidance, continued
9 to sexually assault her, by fondling her private parts,
10 undressing her, kissing her with his tongue, masturbating on her
11 stomach, touching and embracing her against her will.

12 12.4 On numerous occasions Defendant Ralph Alskog,
13 under the guise of providing ministerial services and counseling
14 and serving as the spiritual connection for Sandy Ehrlich,
15 became aware of her vulnerability. As a result of manipulation,
16 exploitation, domination, use of authority and position, and
17 acting under the guise of providing ministerial counseling and
18 serving as a spiritual connection, Plaintiff Sandy Ehrlich was
19 coerced and pressured and unduly influenced into having a
20 spiritual connection and sexual contact with Defendant Ralph
21 Alskog.

22 12.5 Defendant, Community Chapel and Bible Training
23 Center, by and through its pastor and president, Defendant
24 Donald Lee Barnett, and his wife, Barbara Barnett, knew or
25 should have known that Defendant Ralph Alskog was involved in
26 the assault, sexual contact, seduction and exploitation of
27 Plaintiff Sandy Ehrlich. Defendant, Community Chapel and Bible
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1 Training Center, by and through its pastor and president,
2 Defendant Donald Lee Barnett, negligently supervised Defendant
3 Ralph Alskog by not terminating the relationship between Ralph
4 Alskog and Sandy Ehrlich. Defendant, Community Chapel and Bible
5 Training Center, by and through its pastor and president, Donald
6 Lee Barnett, and his wife, Barbara Barnett, knew or should have
7 known that the Defendant Ralph Alskog was causing marital
8 difficulties, family disharmony, marital separation, loss of
9 consortium, between Plaintiffs Sandy Ehrlich and Michael
10 Ehrlich. Defendant, Community Chapel and Bible Training Center,
11 by and through its pastor and president, Defendant Donald Lee
12 Barnett, acted negligently in not supervising Defendant, Ralph
13 Alskog, and in not taking corrective actions, sanctions,
14 preventative measures in ending the relationship between Ralph
15 Alskog and Sandy Ehrlich.

16 12.6 After a period of time, Plaintiffs Sandy Ehrlich
17 and Michael Ehrlich, separately and together, realized that
18 Defendant Ralph Alskog's conduct was not sanctioned by God and
19 was a ruse concocted by Defendants in order to satisfy
20 deviate sexual needs.

21 12.7 On or about May 11, 1986, both Plaintiffs Sandy
22 Ehrlich and Michael Ehrlich were "disfellowshipped" from the
23 Defendant, Community Chapel and Bible Training Center as a
24 consequence of Sandy Ehrlich's refusal to participate in further
25 sexual activities with Defendant Ralph Alskog and/or questioning
26 the "spiritual connection" doctrine and practices of Defendants.
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1 with his hand. With the other hand Defendant Howerton rubbed
2 Plaintiff Sybil Lemke's thigh. Defendant Robert Howerton was
3 breathing heavily and forcefully kissing Plaintiff Sybil Lemke
4 on her body. Defendant Robert Howerton professed to be driven
5 by God and represented to Plaintiff Sybil Lemke that his conduct
6 was sanctioned by God and was spiritual.

7 13.6 On numerous occasions, Defendant Robert Howerton,
8 under the guise of providing ministerial services and counseling
9 and serving as Plaintiff Sybil Lemke's spiritual connection,
10 became aware of the vulnerability of Plaintiff Sybil Lemke.
11 Defendant Robert Howerton took advantage of her weakness and
12 need for support and manipulated Plaintiff Sybil Lemke.

13 13.7 As a result of manipulation, exploitation, domina-
14 tion, use of authority and position by Defendants, Plaintiff
15 Sybil Lemke was coerced, pressured and unduly influenced into
16 having a spiritual connection and sexual contact with Defendant
17 Robert Howerton.

18 13.8 Defendant, Community Chapel and Bible Training
19 Center, by and through its pastor and president, Defendant
20 Donald Lee Barnett, knew or should have known that Defendant
21 Robert Howerton was involved in the seduction, sexual contact
22 and spiritual connection with Plaintiff Sybil Lemke, a minor.
23 Defendant, the Community Chapel and Bible Training Center, by
24 and through its pastor and president, acted negligently in not
25 supervising Defendant Robert Howerton and in not taking
26 corrective actions, sanctions, preventative measures in ending
27 the relationship between Robert Howerton and Sybil Lemke.
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1 revolved around the activities of the Defendant, Community
2 Chapel and Bible Training Center.

3 14.2 On several occasions, Defendant E. Scott
4 Hartley, under the guise of providing ministerial services and
5 counseling as well as attempting to have a spiritual connection
6 with Plaintiff Reynolds, sexually assaulted her by placing his
7 hands on her breast, and other parts of her body, and forcibly
8 kissing her and embracing her against her will.

9 14.3 On several occasions, Defendant E. Scott
10 Hartley, under the guise of providing ministerial services and
11 counseling as well as attempting to be Plaintiff Reynolds'
12 "spiritual connection," became aware of her vulnerability.
13 Defendant E. Scott Hartley took advantage of her weakness and
14 need for support and manipulated Plaintiff Reynolds.

15 14.4 As a result of manipulation, exploitation,
16 domination, use of authority and position by Defendants,
17 Plaintiff Reynolds was coerced and/or forced into a "spiritual
18 connection" and/or sexual contact with Defendant E. Scott
19 Hartley.

20 14.5 Defendant, the Community Chapel and Bible
21 Training Center, by and through its pastor and president, Donald
22 Lee Barnett, knew or should have known that Defendant E. Scott
23 Hartley was involved in the seduction, sexual contact and
24 attempted spiritual connection with Plaintiff Reynolds.
25 Defendant, Community Chapel and Bible Training Center, by and
26 through its pastor and president, Defendant Donald Lee Barnett,
27 acted negligently in not supervising Defendant, E. Scott Hartley
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1 and in not taking corrective actions, sanctions, preventative
2 measures in ending the relationship between Defendant E. Scott
3 Hartley and Plaintiff Reynolds.

4 14.6 After a period of time, Plaintiff Reynolds
5 realized that Defendants' conduct was not sanctioned by God and
6 was a ruse concocted by Defendants in order to satisfy deviant
7 sexual needs.

8 14.7 Plaintiff Reynolds was "disfellowshipped"
9 from the Community Chapel and Bible Training Center, as a
10 consequence of her refusal to participate in further sexual
11 contact with Defendant E. Scott Hartley and/or her questioning
12 the "spiritual connection" doctrines and practices of
13 Defendants.

14 14.8 Defendants have made disparaging and false
15 statements publicly regarding Plaintiff Reynolds to members of
16 the congregation which tended to injure Plaintiff's reputation
17 in the community.

18 XV.

19 15.1 The minor children, Shawna Michelle Chabot,
20 Michael Grant Chabot, and Nicholas Sterling Chabot, were members
21 of the Defendant, Community Chapel and Bible Training Center at
22 all times material hereto.

23 15.2 Dee Chabot and her three minor children
24 regularly attended services at the Defendant Community Chapel
25 and Bible Training Center. Dee Chabot has attended such
26 services for approximately fifteen years. Dee Chabot was a
27 member of the congregation and attended numerous functions and
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1 was an active participant in church functions. Plaintiff Chabot
2 was married at Defendant, Community Chapel and Bible Training
3 Center and attended the Bible College on a part-time basis.
4 Plaintiffs, Shawna Michele Chabot and Michael Grant Chabot,
5 attended school at Defendant, Community Chapel and Bible
6 Training Center. Dee Chabot tithed a portion of her income to
7 Defendant, Community Chapel and Bible Training Center, to help
8 sustain it. Plaintiff Chabot volunteered her time to Defendant,
9 Community Chapel and Bible Training Center. Plaintiff Chabot's
10 life and her children's lives revolved around the activities of
11 the Defendant, Community Chapel and Bible Training Center.

12 15.3 Plaintiff Chabot's husband, Grant Brian
13 Chabot, has entered into more than one "spiritual connection"
14 with women members of the church congregation. Plaintiff
15 Chabot, on more than one occasion, sought counsel from members
16 of the Defendant, Community Chapel and Bible Training Center,
17 seeking help to restore her marriage, prevent the break-up of
18 her marriage, and, to put an end to the family disharmony caused
19 by "spiritual connections," to end the loss of consortium she
20 was suffering, to prevent and end the destruction of the parent-
21 child relationships, to prevent and end the loss of companion-
22 ship, love, support and guidance suffered by her children, and
23 to prevent and end the pressures and threats made to her
24 children to enter into "dancing" and/or "spiritual connections"
25 with other children while attending Christian school at
26 Defendant, Community Chapel and Bible Training Center.
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1 Plaintiff Chabot was counseled that she had to "release" her
2 husband to other female members of the congregation and allow
3 him to experience "spiritual connections" with said female
4 members of the congregation. Plaintiff Chabot was told by Defen-
5 dants that her failure to accept the "spiritual connections,"
6 the "move of God" and to release her husband meant she was
7 possessed by demons and demonic spirits.

8 15.4 As a result of manipulation, exploitation,
9 domination, use of authority and position by Defendants,
10 Plaintiff Chabot and her children were coerced, pressured and
11 unduly influenced into "dancing" and seeking "spiritual
12 connections."

13 15.5 Defendant, Community Chapel and Bible
14 Training Center, by and through its pastor and president,
15 Defendant Donald Lee Barnett, knew or should have known that
16 Plaintiff's husband was involved in spiritual connections and
17 having sexual contact with other spouses of the congregation,
18 causing family disharmony, marital instability and destruction
19 of the parent-child relationships, and loss of companionship,
20 love, guidance and support for the children.

21 15.6 Defendant, the Community Chapel and Bible
22 Training Center, by and through its pastor and president,
23 Defendant Donald Lee Barnett, acted negligently in not
24 intervening and ending Grant Brian Chabot's spiritual
25 connections with other women and attempting to restore the
26 parent-child relationship of guidance, support and love.
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1 reason of the foregoing, Plaintiff sustained special damages
2 according to proof.

3 16.4 As a direct and proximate result of the
4 intentional, reckless, and/or negligent wrongful acts and
5 omissions of the Defendants, and each of them, Plaintiff will be
6 required to and incur in the future reasonable and necessary
7 expenses in connection with the treatment of said personal
8 injuries. By reason of the foregoing, Plaintiff will sustain
9 additional special damages according to proof.

10 16.5 As a direct and proximate result of the
11 intentional, reckless, and/or negligent wrongful acts and
12 omissions of the Defendants, and each of them, Plaintiff has
13 suffered a loss of earnings to date in an amount which is
14 presently unknown but which will be proven at the time of trial.

15 16.6 As a direct and proximate result of the
16 intentional, reckless, and/or negligent wrongful acts and
17 omissions of the Defendants, and each of them, Plaintiff is
18 entitled to actual damages, damages for continuing pain and
19 suffering, and attorney fees and costs under the laws of the
20 United States of America and the State of Washington.

21 XVII.

22 FIRST CAUSE OF ACTION: OUTRAGE

23 17.1 Plaintiffs hereby incorporate by reference
24 each and every allegation as set forth in paragraphs I through
25 XVI.
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1 Defendant Donald Lee Barnett, and other Defendants, did not
2 exercise the degree of care, skill, diligence and knowledge
3 commonly possessed and exercised by a reasonable, careful and
4 prudent counselor in this jurisdiction by manipulating
5 Plaintiffs into having a spiritual connection and/or sexual
6 contact with Defendants. Defendant, the Community Chapel and
7 Bible Training Center, by and through its pastor and president,
8 Defendant Donald Lee Barnett, and other Defendants, acted
9 intentionally, recklessly, and/or negligently in its conduct
10 and/or omissions and this constituted the tort of counselor
11 malpractice.

12 18.3 Defendant Ralph Alskog did not exercise the
13 degree of care, skill, diligence and knowledge commonly
14 possessed and exercised by a reasonable, careful and prudent
15 counselor in this jurisdiction by manipulating Plaintiff Sandy
16 Ehrlich into having a "spiritual connection" and/or sexual
17 contact. Defendant Ralph Alskog acted intentionally,
18 recklessly, and/or negligently in his acts and/or omissions and
19 this constituted the tort of counselor malpractice.

20 18.4 Defendant Robert Howerton did not exercise
21 the degree of care, skill, diligence and knowledge commonly
22 possessed and exercised by a reasonable, careful and prudent
23 counselor in this jurisdiction by manipulating a minor,
24 Plaintiff Sybil Lemke, into a "spiritual connection" and/or
25 sexual contact. Defendant Robert Howerton did intentionally,
26 recklessly, and/or negligently commit acts and/or omissions
27 which constituted the tort of counselor malpractice.
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1 18.5 Defendant E. Scott Hartley did not exercise
2 the degree of care, skill, diligence and knowledge commonly
3 possessed and exercised by a reasonable, careful and prudent
4 counselor in this jurisdiction by manipulating Plaintiff Kathryn
5 Reynolds into a spiritual connection and/or sexual contact.
6 Defendant E. Scott Hartley did intentionally, recklessly, and/or
7 negligently commit acts and/or omissions which constituted the
8 tort of counselor malpractice.

9 18.6 Defendants, the Community Chapel and Bible
10 Training Center, by and through its pastor and president,
11 Defendant Donald Lee Barnett, along with all other Defendants,
12 did not exercise the degree of care, skill, diligence and
13 knowledge commonly possessed and exercised by a reasonable,
14 careful and prudent counselor in this jurisdiction by telling
15 Plaintiff Dee Chabot that she should "release" her husband to
16 other member(s) of the congregation; by telling Plaintiff Dee
17 Chabot that her failure to "release" her husband to having
18 spiritual connection with another member of the congregation
19 meant she was possessed by demonic spirits, and by failing to
20 intervene and help restore marital harmony, parent-child
21 relationships and the loss of love, guidance, companionship and
22 support for her children. These Defendants did intentionally,
23 recklessly, and/or negligently commit acts and/or omissions
24 which constituted the tort of counselor malpractice.

25 18.7 As a direct and proximate result of
26 Defendants' malpractice, each Plaintiff has sustained severe
27 pain and suffering.
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XIX.

THIRD CAUSE OF ACTION: NEGLIGENT COUNSELING

19.1 Plaintiff incorporates by reference each and every allegation as set forth in paragraphs I through XVIII.

19.2 Defendants held themselves out to Plaintiffs as being capable of performing family counseling, marital counseling and spiritual counseling, which requires the skill of a person competent to counsel the Plaintiffs in their respective needs.

19.3 Defendants were negligent in counseling Plaintiffs in that Defendants failed to exercise or possess that degree of skill, care, and learning ordinarily exercised or possessed by the average qualified counselor, taking into account the existing state of knowledge and practice in the field of clergy, marital counseling, and other counseling professions. Defendants negligently violated the duty of care as a counselor by either having sexual contact with Plaintiffs or entering into "spiritual connections" with Plaintiffs or failing to assist Plaintiffs in restoring marital harmony, family harmony, preventing loss of consortium between spouses, putting an end to the destruction of the parent-child relationship and ending the loss of guidance, love, support and companionship suffered by minors-Plaintiffs.

19.4 As a direct and proximate result of Defendants' negligent counseling, each Plaintiff sustained severe pain and suffering.

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FOURTH CAUSE OF ACTION:

PASTORAL AND MINISTERIAL MALPRACTICE

20.1 Plaintiffs incorporate by reference each and every allegation as set forth in paragraphs I through XIX.

20.2 Defendant, Community Chapel and Bible Training Center, by and through its pastor and president, Defendant Donald Lee Barnett, intentionally, recklessly, and/or negligently failed to exercise that degree of care, skill, diligence and knowledge commonly possessed and exercised by a reasonable, careful and prudent pastor/minister in this jurisdiction. This intentional, reckless, negligent act and/or omission constitutes the tort of pastoral/ministerial malpractice.

20.3 Defendants intentionally, recklessly, and/or negligently failed to exercise that degree of care, skill, diligence and knowledge commonly possessed and exercised by a reasonable, careful and prudent minister in this jurisdiction. This intentional, reckless, negligent act and/or omission constitutes the tort of pastoral/ministerial malpractice.

20.4 As a direct and proximate result of Defendants' negligent counseling, each Plaintiff sustained severe pain and suffering.

XXI.

FIFTH CAUSE OF ACTION: SEXUAL ASSAULT AND BATTERY

21.1 Plaintiff Sandy Ehrlich incorporates by reference each and every allegation as set forth in paragraphs I

1 through XX. The offensive sexual contact and touching by
2 Defendant, Ralph Alskog, against the will and body of Plaintiff,
3 Sandy Ehrlich, resulted in personal injuries to her and
4 constitutes constitutes the torts of assault, battery and false
5 imprisonment.

6 21.2 Plaintiff Sybil Lemke incorporates by
7 reference each and every allegation as set forth in paragraphs I
8 through XX. The offensive sexual contact and touching by Defen-
9 dant, Robert Howerton, against the will and body of Plaintiff,
10 Sybil Lemke, resulted in personal injuries to her and consti-
11 tuted the torts of assault, battery and false imprisonment.

12 21.3 Plaintiff Kathryn Reynolds incorporates by
13 reference each and every allegation as set forth in paragraphs I
14 through XX. The offensive sexual contact and touching by Defen-
15 dant, E. Scott Hartley, against the will and body of Plaintiff,
16 Kathryn Reynolds, resulted in personal injuries to her and
17 constituted the torts of assault, battery and false
18 imprisonment.

19 XXII.

20 SIXTH CAUSE OF ACTION: DEFAMATION

21 22.1 Plaintiffs incorporate by reference each and
22 every allegation set forth in paragraphs I through XXI.

23 22.2 As a direct and proximate result of acts
24 and/or omissions of Defendants in making disparaging and false
25 statements publicly regarding respective Plaintiffs, each and
26 every Plaintiff's reputation was damaged and constitutes the
27 tort of defamation.
28

1 XXIII.

2 SEVENTH CAUSE OF ACTION: LOSS OF CONSORTIUM

3 23.1 Plaintiffs Sandy and Michael Ehrlich
4 incorporate by reference each and every allegation as set forth
5 in paragraphs I through XXII.

6 23.2 As a direct and proximate result of the acts
7 and/or omissions of Defendants, Plaintiff Michael Ehrlich has
8 suffered a loss of consortium, including without limitation
9 thereto, the loss of love, affections, care, services,
10 companionship and society of his wife, Sandy Ehrlich.

11 23.3 As a direct and proximate result of the acts
12 and/or omissions of Defendants, Plaintiff Sandy Ehrlich has
13 suffered a loss of consortium, including without limitation
14 thereto, the loss of love, affections, care, services,
15 companionship and society of her husband, Michael Ehrlich.

16 XXIV

17 EIGHTH CAUSE OF ACTION:

18 DESTRUCTION OF PARENT-CHILD RELATIONSHIP

19 24.1 Plaintiffs Larry Lemke and Dee Chabot
20 incorporate by reference each and every allegation as set forth
21 in paragraphs I through XXIII.

22 24.2 As a direct and proximate result of the acts
23 and/or omissions of Defendants, Plaintiffs, Larry Lemke and Dee
24 Chabot, suffered the loss of love and companionship and injury
25 to and destruction of the parent-child relationship.
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XXV.

NINTH CAUSE OF ACTION:

CHILDREN'S LOSS OF CONSORTIUM

25.1 Plaintiffs Sybil Lemke, Shawna Michele Chabot, Michael Grant Chabot, and Nicholas Sterling Chabot, minors, incorporate by reference each and every allegation contained in paragraphs I through XXIV.

25.2 As a direct and proximate result of the acts and/or omissions of Defendants, Plaintiffs Sybil Lemke, Shawna Michele Chabot, Michael Grant Chabot, and Nicholas Sterling Chabot, minors, suffered the loss of love, care, companionship, and guidance of their respective Plaintiff-parent.

XXVI.

TENTH CAUSE OF ACTION: WRONGFUL DISFELLOWSHIPMENT

26.1 Plaintiffs incorporate by reference each and every allegation contained in paragraphs I through XXV.

26.2 Defendant, Community Chapel and Bible Training Center, by and through its pastor and president, Donald Lee Barnett, had knowledge of Defendants' conduct towards Plaintiffs and failed to take corrective actions, sanctions, preventative measures, or in any way to prevent Plaintiffs from being disfellowshipped.

26.3 Plaintiffs' questioning and/or challenging the "spiritual connections" doctrine and practices of Defendant, Community Chapel and Bible Training Center, by and through its pastor and president, Defendant Donald Lee Barnett, led to their

1 disfellowshipment from Defendant, Community Chapel and Bible
2 Training Center.

3 26.4 As a direct and proximate result of being
4 "disfellowshipped" from Defendant, Community Chapel and Bible
5 Training Center, Plaintiffs were ostracized from their peers,
6 barred from attending church services, members of the
7 congregation were directed not to have further contact with
8 respective Plaintiffs, and endured severe pain and suffering.

9 26.5 As a further direct and proximate result of
10 Plaintiffs' wrongful disfellowshipment, each of the Plaintiffs
11 have been shunned by members of the Community Chapel and Bible
12 Training Center, lost their jobs, have been greatly humiliated,
13 lost their friends, shamed, embarrassed and endured great
14 suffering and remain nervous and distraught.

15 XXVII.

16 ELEVENTH CAUSE OF ACTION: SEDUCTION OF CHILD

17 27.1 Plaintiffs, Larry Lemke and Sybil Lemke,
18 incorporate by reference each and every allegation contained in
19 paragraphs I-XXVI.

20 27.2 As a direct and proximate result of the offensive
21 sexual contact and touching by Defendant, Ralph Alskog, against
22 the will and body of Plaintiff, Sybil Lemke, she suffered
23 personal injuries and this constitutes the tort of seduction of
24 a child.
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1 WHEREFORE each and every Plaintiff and together pray
2 for judgment against the Defendants as follows:

- 3 1. For general damages already incurred and future
4 general damages in an amount unknown but which
5 will be proved at the time of trial;
6 2. For medical expenses incurred and for future
7 medical expenses and other costs, in an amount
8 unknown which will be proved at the time of trial.
9 3. For loss of wages and earnings which will be
10 proved at the time of trial;
11 4. For costs and disbursements;
12 5. For prejudgment interest;
13 6. For reasonable attorney fees;
14 7. For injunctive relief;
15 8. For such other relief as this court may deem just
16 and proper in this cause.

17 WHEREFORE Plaintiffs Michael and Sandy Ehrlich further
18 pray for judgment against the Defendants as follows:

- 19 10. For loss of consortium;

20 WHEREFORE Plaintiffs Larry Lemke and Dee Chabot further
21 pray for judgment against the Defendants as follows:

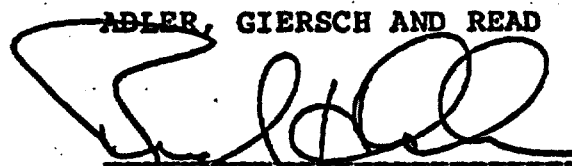
- 22 11. For loss of parent-child relationship;

23 WHEREFORE Plaintiffs Sybil Lemke, Shawna Michele
24 Chabot, Michael Grant Chabot and Nicholas Sterling Chabot,
25 minors, further pray for judgment against the Defendants as
26 follows:
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12. For loss of parental consortium, love, support,
guidance and companionship.

DATED this 31st day of July, 1986.

ADLER, GIERSCH AND READ


Richard H. Adler
Attorney for Plaintiffs

EXHIBIT B

EXHIBIT C

'Spiritual connections' continue in trouble-plagued church

by Carol M. Ostrom
Times religion reporter

Three church leaders have been convicted of failing to report child abuse, scores of the faithful have been divorced, former members are suing church officials, and the pastor and his wife have separated.

That kind of trouble could doom an ordinary church. But then, the charismatic, controversial Community Chapel & Bible Training Center near Burien is no ordinary church.

Though the parking lot at the sprawling, modern \$10 million-plus complex is no longer filled to overflowing, and the church recently announced a series of budget cuts, Friday evening services still often draw more than 1,000 church members.

On one recent evening, whirling worshippers danced alone and in pairs in the church's foyer, raising their arms in ecstasy and excitement as music from a number of groups, alternating between upbeat and soft, was piped through loudspeakers.

In the red-carpeted church sanctuary and an adjacent gym, couples involved in "spiritual connections" expressed themselves in what has become the most controversial part of the charismatic church's teaching.

Two spiritual partners, each married to another, gazed lovingly into each other's eyes as they danced slowly, holding each other close, then apart. Stroking the back of her partner's head, the woman slipped her hand tenderly around his shoulders. As they twirled slowly, he stroked her face, his gaze locked on hers.

Elsewhere in the church, dozens of other couples kissed and embraced, looking at each other adoringly. The man, the church teaches, is to be regarded as though he were Jesus; the woman, as the "bride of Christ," or the church. In those roles, they are to touch each other lovingly.

Typically, after Friday evening services, some couples continue their dancing in a small room in an adjacent building. On one recent evening, about a dozen couples danced as several sat on padded seats around the edge of the room, locked in embraces. Another couple, having danced around the room, continued their dance on the floor, the man partly covering the woman's body with his, kissing her neck and her face, while she moved to the music.

After a few minutes, they shifted, the woman pressing her upper body into his as he swayed back and forth on the floor. Another couple danced joyously around them, raising their arms and touching hands as they circled the couple lost in ecstasy.

This "move of God," as Pastor Donald Lee Barnett refers to his doctrine of spiritual connections, is no less inflammatory now than it was nearly two years ago, when a number of elders and teachers began leaving the church. But for those who stayed, many who have both spouse and "spiritual connection" there, it appears to remain a powerful draw.

Barnett has warned of allowing such "spiritual connections" to become sexual, even preaching against the dangers of spiritual partners French



Pastor Donald Lee Barnett performs a "healing" on a church member.

Ann E. Yow / Seattle Times, 1986

Please see **CHAPEL** on next page

Advances in child care need federal support, advocate says

by Jim Simon

such issues as AIDS and children for low-income children

Let's Clear The Air

Sexual assault suits await Community Chapel's controversial pastor

CHAPEL

continued from previous page

kissing, but critics inside and outside the church say such connections inevitably lead to sexual and love relationships between people not married to each other.

The purpose, Barnett has said, is to draw couples closer together. But many critics say "the move" has had just the opposite effect.

And in June, difficulties seemed to have hit even the Barnetts, who announced in church that they had separated.

"Isn't it strange — this whole thing was supposed to bring marriages together," said one woman close to the Barnetts.

In previous services, the Barnetts had disagreed publicly, even tussling over the microphone and asking church members to take sides.

And despite the recent convictions of three church ministers and counselors for failing to report abuse against members' children, counselor David Motherwell took the microphone during a recent service to say the conviction hadn't swayed him.

"I have no plans of changing how I minister, even though the judge said, 'You are a social worker and therefore you're guilty.' I don't have any plans on changing that," said Motherwell, as the audience murmured "Yeah," and "Amen."

"I know the devil is after the ministry that's here," Motherwell told his approving audience.

"Because there's a ministry here that's ministering to the souls of men and trying to get them reconciled into God ... God's trying to minister this to us using us for each other to do this, to

our father. And I know the enemy is out to take this away from us, because God will want to use what we are doing here to show the rest of the church world how it's done," he continued.

"The bottom line, the thing that's behind this is that Satan is trying to take dominion over the sheep of God," he said, as the amens and cheers grew louder.

Urging the church members to send letters to Congress supporting the nomination of Judge Robert Bork, because the three counselors' cases might well end up before the U.S. Supreme Court, Motherwell said the nominee stands for religious freedom.

Motherwell was convicted last month of failing to report knowledge of the abuse of an 8-year-old girl by her father, a church member. A state law requires counselors and other social workers to report suspected child-abuse cases to police or other authorities.

His was the third such conviction of a church official recently.

The church, which began as a small Bible study group in Barnett's basement recreation room in 1967, has been surrounded by controversy for most of the past 10 years. Much of it has focused on Barnett's style, one he referred to in a letter to The Times in 1981 as "strong leadership," but which critics call control by fear and intimidation.

Always a charismatic or "spirit-filled" church, the Chapel began to lose members, including some key leaders, about two years ago after Barnett had a revelation that members could find holiness through a spiritual connection to someone else's spouse.

Two suicides and a murder of a child by church members in the months of late 1985 and early 1986 raised more questions about the church's teachings and practices, which include exorcism of "de-

jealousy" often attending those whose spouses are involved in spiritual connections with others.

And it appears that the church's troubles are not over yet.

Last week's church bulletin announced a series of budget cuts, including closure of the church office, staff layoffs in the tape library, and cuts in janitorial service.

Church attendance appears to have fallen considerably from earlier levels, and enrollment at the Bible college has fallen off as well.

A survey enclosed with the bulletin noted that the church was thinking of making its Bible student housing available to non-student church members.

And yet to come are a number of civil suits filed a little more than a year ago against Barnett, including one by three former church

members who claim that he sexually assaulted them under the guise of ministerial counseling, and another by families who claim the church's teachings broke up their marriages and family relationships.

As they have in the past, church officials declined to comment on these and other allegations.

Sandi Lee Brown, one of the former members suing Barnett, said in papers filed with the suit that the pastor threatened to throw her out of the church when she told him she didn't believe his conduct was sanctioned by God. And when she complained about his actions to church elders, Brown said in the suit, they protected him, and she eventually was barred from the church.

For now, at least, none of these

past or present difficulties seems to be slowing down the dancing or the connecting going on at Community Chapel. But those close to the

church say they expect other chapters will unfold in the story of the church that Don Barnett created.

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Religion

Prosecutors study eight cases at Burien chapel

by Carol M. Ostrom
Times religion reporter

King County police and prosecutors are investigating rape, assault and indecent-liberties allegations against members of the Community Chapel and Bible Training Center near Burien.

Larry Daly, King County detective, confirmed that he has sent eight cases to prosecutors, along with a recommendation that charges be filed in four of them.

Victims in those four cases include three adult women and one teen-age girl, Daly said. Victims in the other cases include children ages 11 to 17, said Daly.

Charges against one chapel member for alleged sexual contact with his stepdaughter have already been filed.

Kate Flack, deputy King County prosecutor in the special assault unit, said her office has been involved in four of the cases so far,

interviewing witnesses and victims. Flack said she expects that a decision whether to file criminal charges could be made within a month on at least two cases.

Community Chapel, a large, independent church headed by the Rev. Donald Barnett, a self-described "Pentecostal holiness pastor," has come under fire recently by former members. In the past six months, a number of church leaders, counselors and teachers have been excommunicated after voicing concerns about Barnett's teachings.

Barnett's encouragement of members to find "spiritual connections" with each other through intimate dancing, former members say, has broken up dozens of families and has figured in two suicides and the murder of a young

girl by her mother.

At least two of the cases brought to the attention of the police, according to former chapel members, involve indecent liberties taken with teen-age girls. In each case, the suspect was an older man who had a "spiritual connection" with the girl.

Barnett has declined to be interviewed, but has cautioned

church members in the past not to allow the "spiritual connections" to become sexual in nature and has attempted several times to set limits, including discouraging adult-child connections.

Barnett has maintained that spiritual connections with other people can help church members find pure, spiritual love and become united with God.

Sunday, July 20, 1986 Highline Times

Sex-abuse cases tied to Chapel

Eight cases involving alleged child sexual abuse among members of Burien's Community Chapel and Bible Training Center have been sent to the King County prosecutor's office, according to a deputy prosecutor.

Prosecuting attorneys will review each case and determine in the next two or three weeks whether to file charges, said deputy prosecutor Kate Flack.

No further information was available regarding whether any of the cases are related to Chapel teachings. The 2,000-member church's "spiritual connection" practice, in which members dance and spend time with someone outside their own family, has been blamed by ex-members for recent divorces, separations, two suicides, a murder and mental problems.

Indecent liberties charges have already been filed against one Chapel member, a 40-year-old Burien man. But the alleged transgressions involve the man's stepdaughter, and according to court documents, occurred mostly before the Chapel began practicing spiritual connections. The case is expected to go to trial by Aug. 6, Flack said.

Times

4 Birkland, Wendell.
Defense Attorney

Seattle woman 4-17-86 guilty of drowning young daughter

PORTLAND (AP) — A judge has found a Seattle mother guilty of murder in the drowning death of her 3-year-old daughter, and ordered the woman transferred to a mental hospital in Maryland.

Multnomah County Circuit Judge R. William Riggs said yesterday that Janet W. Cole, 37, was suicidal and unable to form criminal intent when she drowned Brittany Jo Cole March 20 in a motel room in north Portland.

A report prepared for the court by a mental-health expert who examined Cole said the woman believed she could protect her daughter from evil forces by killing her.

The reports described Cole as severely disturbed and tormented while a member of a fundamentalist Christian church near Burien, Wash.

The Pentecostal church, called the Community Chapel and Bible Training Center, has been the focus of controversy recently. Two members have committed suicide, and a number of high-ranking members recently have resigned, protesting current practices at the church.

Members are encouraged to establish strong "spiritual connections" with other people and "demons" are regularly blamed for emotional turmoil.

The church, which began as a small, fundamentalist group in the late '60s, now claims 3,500 members and operates from a sprawling, \$9 million-plus complex.

Riggs' early ruling in the case, which originally was scheduled for trial in May, came after prosecutors and defense attorneys agreed to the facts presented in the murder indictment and to reports from four mental-health experts who examined Cole after the killing.

Deputy District Attorney Robert Laineweber said doctors consulted by both sides agreed that Cole was

Psychiatric experts agreed on diagnosis

COLE / continued from F 1

suffering from a psychosis when she killed her daughter and that she was in need of long-term treatment. The University of Oregon Health Sciences Center, where Cole has been cared for since her daughter's death, Laineweber said, is not set up for long-term care.

Defense attorney Wendell Birkland said the Maryland hospital, which has experience treating cases similar to Cole's, would provide treatment "for as long as necessary" in a secure ward.

Cole was to be flown from Portland to Maryland today, according to plans approved by the judge. Riggs said the hospital

would provide monthly reports to the Psychiatric Security Review Board describing the treatment and progress, if any, made by the woman.

The reports also indicated that Cole intended to kill herself at the same time by taking an overdose of over-the-counter sleeping pills.

Birkland said Cole was "extremely suicidal" at the time she drowned her daughter.

Reports submitted as evidence indicated Cole had been married for 10 years and that she had been working until recently as a banquet waitress in Seattle. One report said she stopped working last December as a result of what she described as "mental pressure."

Laineweber said Cole's husband and her family's medical insurance would pay for the Maryland treatment.

A sunbather takes a break and leans through Isamu Noguchi's "Black Sun" sculpture in Volunteer Park on Capitol Hill.

Bryan Monroe / Seattle Times

7/29/87 TIMES

Former minister gets prison, not treatment, for sex offense

by Carol M. Ostrom
Times religion reporter

Richard Cole, a former teacher and youth minister at the controversial Community Chapel and Bible Training Center in the Burien area, has been sentenced to 14 months in prison for taking indecent liberties with a 14-year-old boy.

Cole is the husband of Janet Cole, who drowned their 5-year-old daughter last year, saying the little girl was possessed by demons. She was convicted of murder and committed to a mental institution.

King County Superior Court Judge Donald Haley refused to give the 39-year-old Cole an alternative sentence, which would have allowed him to attend a treatment program for sexual offenders. The sentence imposed is the maximum under the Sentencing Reform Act.

"The court recognizes that Mr. Cole will go into the Department of Corrections as an ill person and come out as an ill person," Haley said.

But sentencing Cole to a treatment program would not ensure that society would be protected, he added.

Cole's is the first case filed by the King County prosecutor's office under the new "abuse of trust" amendment to the indecent-liberties statute, said Kate Flack, deputy prosecutor. Normally, the prosecutor can charge a person with indecent liberties only if the victim is under age 14.

The amendment, enacted last year by the Legislature, allows the

prosecutor to charge offenders whose victims are 14, 15- or 16-year-olds if the offender is in a position of trust or acting in a parental role to the victim. Cole's victim had been one of his students at Community Chapel's Christian school.

Community Chapel is an independent, fundamentalist and Pentecostal church in the Burien area that has been shaken over the past year by the departure of many

tions on contact with the victim and had "attempted to manipulate and control" the judicial system.

The standard range of sentencing is for typical cases, she argued, adding: "This is not a typical case. The point is that Mr. Cole is a danger. He's a danger to the community."

Drawing from a court-appointed psychologist's report, Flack characterized him as a "seriously disturbed individual" who has "psychotic and near-psychotic reactions."

Speaking to the judge before he was sentenced, Cole denied Flack's assertion that he had not taken emotional responsibility for his crime.

"I'm about as emotioned-out by the events of the last year as I can be," said Cole, his voice shaking. "I've lost the two people who are the most important people in my life. . . . I've cried all I can cry."

Cole said he realized that his actions had been "tremendous contributing factors" that added to the "emotional pressure cooker" that triggered his wife's breakdown.

The psychologist's report to the judge said treatment should deal not only with Cole's emotional and sexual problems but also with his religious beliefs, which the report said sometimes gave Cole the opportunity to shirk responsibility for his actions.

As friends of Cole's in the courtroom wept, the judge told Cole he hoped his prison sentence, like the other recent tragedies in his life, would help motivate him to find treatment.

'Mr. Cole is a danger... to the community.'

**Kate Flack,
deputy prosecutor**

elders and church leaders who protested the teachings of its pastor, Donald Lee Barnett.

Those teachings include encouraging members to establish strong "spiritual connections" with each other, connections that former members claim have led to marriage breakups and emotional trauma.

In another recent case, three Community Chapel counselors were charged with not reporting knowledge of child abuse.

Flack asked the judge to sentence Cole to four years in prison, saying Cole had broken prohibi-

Reagan nominates Dwyer as U.S. judge — again

by Eric Pryne
Times Washington Bureau

WASHINGTON — President Reagan has formally renominated Seattle attorney William Dwyer for a federal judgeship, more than 16 months after Washington's senators first recommended him.

The White House sent Dwyer's nomination papers to the Senate yesterday. Sen. Dan Evans, R-

seeking early confirmation hearings.

A committee source said Dwyer should have no trouble with the panel.

Evans announced last Thursday that Dwyer's nomination was imminent. But administration officials wouldn't talk, and, considering the tangled, troubled history of the Dwyer affair, observers couldn't be absolutely certain until the president acted.

judgeship in Seattle was opposed by conservative Republicans in the state, and the Reagan Justice Department seemed to sympathize with them. Dwyer was first nominated by Reagan last September — but only after the administration struck a deal with former Sen. Slade Gorton, R-Wash.

Gorton's defeat in the November election seemed to free the administration from that commitment, but earlier this month Evans asked White House chief of staff

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Church is blamed for 'messaging up' sons

From Page A-1
church services, children saw their parents spending more time with their connections than their spouses, Webb says.

Although Webb is single, she says her sons were troubled because they knew her connections were married men. (Both her former connections are now divorced, she says.)

"My children have been severely affected by the confusion they've seen," Webb says, her voice choking. "They're really messed up. They totally flipped out."

Emphasis on demons

Joy Kirkpatrick, a marriage and family therapist who counsels families leaving the Chapel, says Barnett's emphasis on demons and connections has been especially destructive to teen-agers.

"There's a real strong spirit of suicide in these kids," says Kirkpatrick, of CRISTA Counseling Service. "They want to cleanse themselves of these demons."

Webb is convinced both her boys will require long-term psychiatric help. She blames the Chapel. Consequently, she is preparing a lawsuit against the Chapel for damage she thinks was done.

Richard Adler, her attorney, says he and his law partners have received many calls from other ex-Chapelites wanting to sue. He says many tell him the connection doctrine has destroyed their personal and family lives.

The attorney says he is exploring the possibility of a class-action damage suit on behalf of former Chapel members.

Meanwhile, King County Police confirm that they are investigating 12 separate allegations of child sexual abuse reported by former Chapel members. Larry Daly, the detective assigned to the cases, declined to discuss them.

Major Terry Allman, head of the criminal investigations division, acknowledged the police investigation and urged witnesses to come forward with information that would prove or disprove the allegations.



JOHN HOLMBERG/P-I PHOTO

Arlene Webb claims the practices of the Community Chapel and Bible Training Center in Burien have harmed her two sons. "My children have been severely affected by the confusion they've seen," the former member says. "They're really messed up. They totally flipped out."

Loren Krenelka, the Chapel's designated press spokesman, said church officials would have no comment on the child abuse allegations or Webb's possible claim for damages. He said the Chapel would cooperate with police.

Cal Freden, a Burien chiropractor in whose basement the church was founded 19 years ago, says the "spiritual connection" teaching has confused children and destroyed families by blurring the relationships between parents and connections. Freden left the Chapel last December and was publicly disfellowshipped in February.

"We have spiritual connections pushed all the way down to the kids," he says.

Although Barnett does not advocate connections between adults and children, Arlene Webb and other ex-Chapel members think the involvement of children in connections has contributed to the suspected child sexual abuse.

"Teachers and (adult) youth leaders have connections with youngsters," Webb says. "Whenever you'd go into school during times of worship, you'd see adults dancing with children."

"When adults make love, they

adore one another," she explains. "It's just like that in the (connection) dance. You're giving your whole self to the other person."

LeRoy A. Anderson, who was disfellowshipped in March, has complained to police and Children's Protective Services that a Chapel woman is sexually molesting his 15-year-old son.

Anderson's marriage fell apart when he left the Chapel and his wife stayed. He filed court papers seeking custody of their four children last month.

In those papers, he contends that his son's "connection had taken indecent liberties with him one night while they were parked in the driveway when she brought him home from dancing."

Anderson alleges that "physical involvement during 'connecting' between young teen-agers and older church members has become a frequent occurrence."

As a result, he says in the court papers, "one (adult) church member has left her husband and announced that she is going to marry her connection, a 16-year-old boy."

Webb says church counselors had no time for her or her sons' problems. Several ex-Chapel mem-

bers say that when they did seek assistance, they were not satisfied with the help and advice offered by Chapel-trained counselors.

For instance, Tony Peterson, an ex-Chapel member, said he complained to church counselors that his wife was not providing for his or their children's needs because she spent several times a week dancing until the wee hours of the morning with her connection. However, Peterson says, in court papers filed in his divorce proceeding, counselors told him he was resisting "a move of God."

However, his ex-wife, Leisa, denies in court papers that she spent an excessive amount of time connecting at church.

After the divorce was granted over Peterson's objections, the Chapel elected to disfellowship him.

"We have made it church policy that we will not keep in fellowship both parties in a divorce," reads a January letter sent to Peterson by Jack Hicks, the Chapel's vice president and general manager. "We don't want you to remain an eligible single, to marry again and bring another woman to catastrophe."

Major Allman, TERRY
head of Criminal investigations

Ex-member blames Burien church for her sons' problems

By John McCoy
and Michael A. Barber
P-I Reporters

Arlene Webb cannot forget the night her 13-year-old son, his eyes full of tears, told her he wanted to die.

Like her, he is a "born again" Christian. And, until recently, he was an exemplary student at the 500-pupil school operated by the Community Chapel and Bible Training Center in Burien.

But late last year, his grades dropped and his behavior changed dramatically. He and his 11-year-old brother became sullen, depressed, anti-social, full of repressed anger, Webb says.

'Spiritual connections'

A 39-year-old single parent, Webb says she finally decided she knew what was behind her boys' behavior: Chapel teaching on "spiritual connections."

Last year, Pastor Donald Barnett, founder of the 2,000-member, independent Pentecostal church, had begun teaching that the closest union with God could be found by dancing, embracing, singing spiritual love songs and spending time with someone else's mate.

While Barnett encourages "spiritual connecting," he expressly forbids fornication and adultery. Those who fall in love or who are otherwise troubled by the doctrine are supposed to see Chapel counselors.

In accord with Barnett's teaching, children as young as 10 were encouraged to find a schoolmate of

□ About 100 south King County pastors met yesterday to discuss ways to help people leave the Community Chapel church. Page A-8.

the opposite sex, stare into each others' eyes and dance together in darkened classrooms, Webb says.

Webb ultimately rejected the connection doctrine and stopped attending the Community Chapel in January. She pulled her boys out of the Chapel school in February, and she was kicked out, or disfellowshipped, by the church in March.

Her boys are now in public school in Federal Way.

Ed Wagner, a psychologist with the Federal Way School District, interviewed Webb's older son and is waiting to see how he adjusts to public school.

"I don't have enough information yet to conclude that any problems he may have are related to the church," Wagner says.

Webb, however, is convinced.

"I encouraged my boys to have connections," she says, although neither son did. "I feel terrible about that now."

Her sons and other children who resisted this "new move of God" or failed in other ways to conform were thought to be possessed by demons, she says. Webb recalls seeing children lying on the school floor flailing and screaming to try to force the demons out.

Meanwhile, at home and at
See CHURCH, Page A-8

Anderson, LeRoy

ed to heresy, he says.

"Anytime you say something negative, they're going to turn you into the pastor," said Johnson, adding that Bible students lived in fear of being disfellowshipped.

"All your friends tell on you," says another ex-Bible student, "because they're watching out for your soul."

Johnson, who remains a born-again, charismatic Christian, now speaks out on behalf of the Colossians Fellowship, a Christian "discernment ministry" that investigates cults and heretical Christian teaching.

Last week, in a talk at Burien Evangelical Church, Johnson charged that the Community Chapel does not accept the Christian doctrine of the Trinity, justifies deception and lying in certain situations, practices harsh disfellowshipping which tears families apart, observes neither Christmas nor Easter, and is absolutely convinced that all Barnett preaches is the word of God.

"They're really following a man's teaching, not God's," Johnson concluded.

Tim Brown, director of Colossians Fellowship, says the Commu-

nity Chapel meets all the sociological criteria of a cult: It is centered on an authoritarian leader who claims to have a unique revelation from God, exerts unusual control over his followers who, believing themselves God's elect, withdraw from the world, and recruits new followers by deception and defaming other religions.

Although Barnett refused to talk with the P-I, the Community Chapel has printed a great deal of literature in its defense.

"Good Churches Slandered as Cults," reads the lead story in an issue of "Balance," a glossy magazine periodically published by the church. Barnett writes that so-called cult experts have confused "good, old-fashioned, strong preaching" with mind control.

'Gossipers and accusers'

"Any church with different views, standards, or policy, especially if it has zealous members or a strong pastor can be called a cult," Barnett writes. "This charge is even more likely if a fast-growing church is attracting people from other churches in the area or if the church is doing so well that the devil, becoming fearful, raises up gossipers and accusers."

The Community Chapel follows traditional Christian doctrine, preaches salvation through Christ, welcomes visitors and does not venerate the pastor, Barnett declares.

The pastor goes on to debunk 38 rumors against his church. Among other things, he denies the church sacrifices chickens, prohibits the wearing of nylons, has weird doctrines, requires a 40 percent tithe and employs undercover agents and hitmen. He also denies his wife is a lesbian who practices witchcraft. No such rumors were reported to the P-I.

Foss, the Lutheran minister across the street, says Barnett counters justifiable criticism of his church by ignoring the real complaints against him.

Meanwhile, the Community Chapel grows and Barnett's authority continues unquestioned, Foss says.

"If you accuse or fight this church," Barnett told his congregation in one sermon, "you are accusing the elect and anointed of God."

Tim Brown

Taken from the Post-Intelligencer newspaper.

Is Normandy Park church a cult? Pastor says no but critics say yes

From Page A-1
viewed.

"We are not offering any interviews to the press," said Lowrie, who went on to berate the Post-Intelligencer for talking to Fidler and Rapp.

"We ask you to refrain from making personal contact with the people in this church without giving respect to this church government," Lowrie said. He referred the P-I to church publications refuting charges that the Community Chapel is a cult.

Barnett's critics are not reluctant to speak out. They include ex-members of Community Chapel, pastors of other churches in the Normandy Park area and even fellow evangelical charismatic Christians.

The Rev. Roy Stedman, pastor of the nearby Normandy Christian Church, has counseled families who have lost members to Barnett's church. He labels the Community Chapel "a cult."

The Rev. Richard Foss, pastor of Prince of Peace Lutheran Church, which sits across the street from Community Chapel, spent months investigating Barnett's church. He too concluded it is "a cult, pure and simple."

Basing his conclusions on Barnett's own taped words, Foss says the Community Chapel pastor tolerates no questioning of his authority and requires absolute obedience. Those who question are "in rebellion against Almighty God" and risk being kicked out and shunned.

Knowledge of Bible

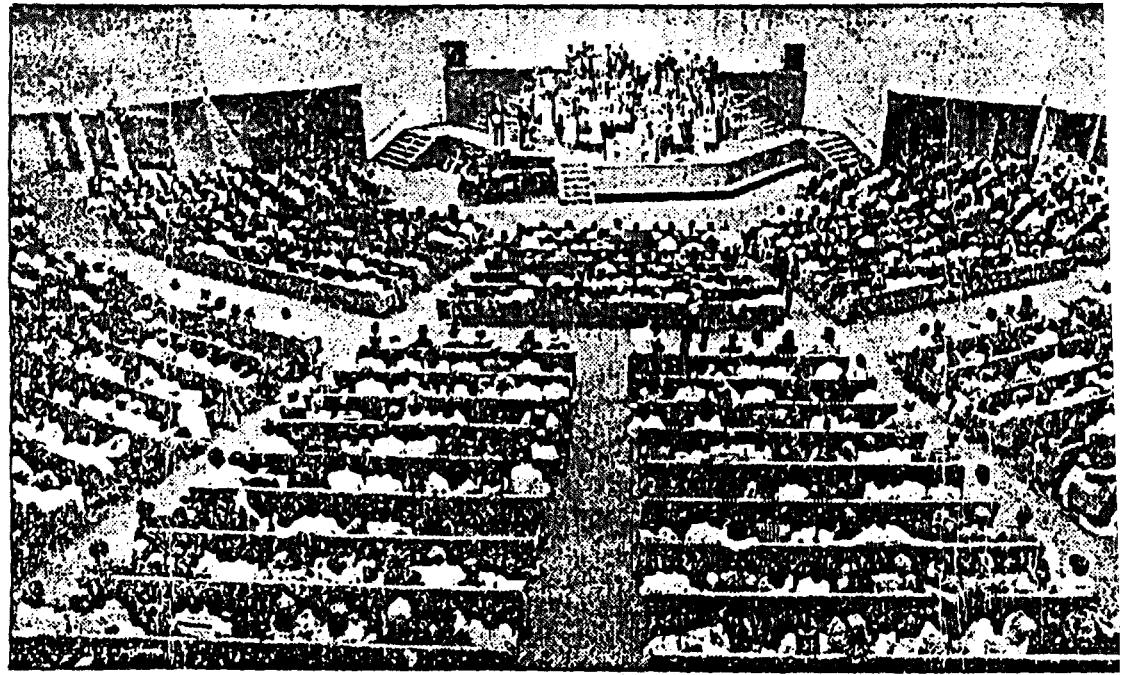
In one taped sermon, Barnett says, "Only when the church member submits to the pastor's authority will he receive God's full revelation."

Foss gives Barnett credit for knowing the Bible.

"He does take everything he says from the Bible," Foss says, "but Jesus is almost never quoted."

Lutheran minister notes Barnett urges his followers to withdraw from the everyday world, avoid other churches and mix only with one other.

"A pastor who already has almost complete control, who preaches sermons about withdrawing from the world and then a



P-I FILE

The Community Chapel and Bible Training Center has 3,500 members and is growing. Twenty years ago it was a Bible study group that met in the home of its founder, Don I.

prophecy comes that says you shouldn't question him, that worries me," Foss says. "There are a lot of good, well-intentioned Christian people in the Community Chapel and a lot of them are completely snowed."

Submission to church authority is a frequent theme at the Community Chapel. At last Sunday's morning service, for instance, a young church elder gave a sermon in which he warned that some of the congregation would be purged this summer.

"Have you stood behind Pastor Don?" he asked. "Will you keep judging our pastor? Have demons been giving you untrue thoughts?"

Stuart Johnson, once a student at the Community Chapel's Bible College, found he and his wife listed as "gross sinners" in the church bulletin three months after they had quietly slipped away. Johnson had dared to question Barnett's teaching.

He had written a paper for a Bible college course challenging the instructor's contention the Bible gives property owners the right to discriminate on the basis of race. Such a challenge is

TIM BROWN
COLLOSSIANS
FELLOWSHIP

le are disappearing...
identifying the
rs.

groups. A dispatch on that action,
also written under the press restric-
tions, appears on page 6.



The New York Times/Joe Traver

governor Jack F. Kemp posing with children at news conference Fri-
ffalo to announce new program for identifying missing children.

p, With National Dream, Faces Fight at Home

MAUREEN DOWD
l to The New York Times

O, June 20 — While Jack F. Kemp was tossing a football for the fans at his 23 years ago, James showing fans to their seats. Kemp has taken his nose out of the political arena. He has seen me," says Mr. Kemp. Buffalo Common Council now shares the political Mr. Kemp as the Democrat Mr. Kemp's House seat.

vintage many people associate with Mr. Kemp — there is 1986 to worry about.

From the Collins Moose lodge to the Gowanda Shriner parade, from the Varysburg fire parade to the Warsaw dairy festival, Mr. Keane is tirelessly spreading his message throughout Erie County: "Jack Kemp cannot serve two masters. He has betrayed the interests of Western New York to fuel his Presidential ambitions."

By vigorously throwing up dozens of

has had since he went to Washington 16 years ago.

"He's making me spend more money and fight harder than I would have," said Mr. Kemp, who is trying to divide his attention between Mr. Keane and other potential rivals named Bush and Dole. "I have to defend my reputation."

The Democrats are crowing. "Jim Keane's doing better than we ever could have hoped," said Representative Tony Coelho of California, the

30,000 votes. Shortly after the election, the United States Embassy in Panama initially concluded that Mr. Arias had won 25,000 votes, Administration officials said. Despite the extensive information on vote fraud, American officials and diplomats said, Secretary of State George P. Shultz agreed to head the American delegation to Mr. Barletta's inauguration in October 1984. While there, Mr. Shultz publicly described Mr. Barletta's election as offering "Panamanians of all political persuasions a new oppor-

Continued on Page 8, Column 1

the two intestinal polyps removed during the President's routine follow-up examination yesterday has been completed and both are benign," Dr. Smith said. "The President was informed of the results by his physician at Camp David this morning."

White House officials would not comment beyond the two-sentence statement.

The examination was part of a prescribed regimen to check every six months for any recurrence of poten-

Continued on Page 11, Column 1

pointments. "Justice Rehnquist and Judge Scalia are representative of the caliber of our Federal court appointments," he said. "I have considered it a primary duty to appoint men and women such as Sandra Day O'Connor, of proven abilities and the finest character, to the Federal courts, and I think we have a proud record to show for it."

"Let's be honest," Mr. Reagan said. "The real objection to Dan Manion is

Continued on Page 11, Column 1

Isolated, Strongly Led Sects Growing in U.S.

By **ROBERT LINDSEY**
Special to The New York Times

SEATTLE — Religious scholars say Americans are flocking to new ultra-fundamentalist Christian sects dominated by leaders who exercise virtually unlimited control over members' lives and thoughts.

The leaders of the groups, said Dr. Ronald Enroth of Westmont College in Santa Barbara, Calif., an academic specialist on the organizations, "claim they alone are plugged in to the Almighty; they practice elitism, authoritarian control that almost always dips into the personal lives of members, and they try to lead them away, isolate them from the rest of society."

Reginald Alev, executive director of Citizens for Freedom, a Chicago organization that monitors the activities of religious cults in this country, said many of the new, largely unknown sects started as splinter groups of existing fundamentalist religions such as

the Assembly of God. Others have sprung up within isolated congregations of nonfundamentalist Protestant denominations, said Dr. Harold Bussell of Gordon College near Boston, who has written books about mind control and religious groups.

Leaders' Power Called Great

By contrast, most of the religious cults and communal groups that gained popularity in the 1960's had links to Eastern religions or mysticism.

What sets the new groups apart from the older sects and the mainstream churches, Mr. Alev, Dr. Bussell and others said, is the great degree of power held by the leaders.

The leaders generally will not discuss their activities with outsiders. But

in their publications and preaching, they scoff at suggestions that they exert mind control, and they hold criticism of their activities to be persecution of the kind often directed at new religions.

Religious scholars insist that there is nothing inherently wrong with small groups of believers gathering together under a powerful leader. After all, they say, many modern religions, such as Christianity, began that way.

But the scholars say the nearly absolute power held by the new groups' leaders creates a potential for abuse.

One of the largest of the new groups, in a Seattle suburb, has aroused great public attention in this area recently as

Continued on Page 12, Column 3

INSIDE

Bo Jackson Picks Baseball
Bo Jackson, college football's Heisman Trophy winner and the first pick of the pros, has decided to play baseball with Kansas City. Page 21.

School Memories on Tape
Video yearbooks are a growing phenomenon at colleges and high schools across the country, a producer of the videotapes says. Page 10.

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Isolated, Strongly Led Sects Are Growing in U.S.:

Continued From Page 1

former members have given accounts of church practices to news organizations as well as to clergy and psychological counselors.

In interviews, former members of the group, the Community Chapel and Bible Training Center, contended that its pastor, Donald Lee Barnett, exercised "mind control" over his 3,000 parishioners. The former members said scores of parishioners had formed adulterous relationships with other members since Mr. Barnett began a church ritual he calls "spiritual connecting" that involves dancing, hugging and kissing in regular church services.

They assert that since this ritual began to flourish about a year ago, more than two dozen couples have divorced or begun divorce proceedings.

Also over the last year, the former members say at least two parishioners have committed suicide. According to prosecutors, one former member, because of fears of demons, drowned her 5-year-old daughter. And at least 200 members have left the church, largely because of opposition to "spiritual connecting," according to clerics in other faiths who are now counseling some of those who left the group.

Larry Daley, a detective for the King County Police Department, said his office was conducting a criminal investigation of the group because of allegations of sexual abuse of children as young as 12 years old, of "indecent liberties taken by some elders related to spiritual connecting" and of assaults by members of the church's armed security force.

Mr. Barnett refused requests for an interview. A deputy, Loren Krenelka, said only that the group was not a cult and that Mr. Barnett was doing nothing wrong.

Dr. Enroth said that in most of the new groups "there is a distortion of human sexuality," but he and other experts say the Seattle group seems to be "more bizarre" than others.

Groups Said to Be Proliferating

The experts say that because many of the groups operate in privacy it is impossible to determine how many there are. But they estimate that the number runs into many hundreds, ranging in size from a dozen or so members to thousands, and that they are taking root in virtually all parts of the country.

The proliferation of ultrafundamentalist sects may be a side effect of a broader national resurgence of interest in Christian fundamentalism in the last decade that has resulted largely from television evangelism, according to Mr. Alev and other specialists.

Mr. Alev said the ultrafundamentalist groups are now growing in membership at a substantially faster rate than older groups such as the Unification Church, the Church of Scientology and the Hare Krishnas, which came into prominence in this country in the 1960's.

Dr. Bussell said he considered the spread of the new groups part of broader "cultural phenomena," explaining that authoritarian leadership was also evident in what he called "psychological development" groups that promised followers, often for a price, solutions to the problems of daily life.

Movement in Argentina

Many of the groups, according to researchers, are loosely rooted in a movement that began in Argentina in 1970. That year, an Assembly of God pastor, Juan Carlos Ortiz, established a new church, the Body of Christ, with a highly structured authority reaching up from small "cells" led by a shepherd, who in turn was led by another shepherd in a pyramid of command.

In 1972, according to the researchers, the shepherding movement was brought into this country by Bob Mumford, a Bible teacher in Fort Lauderdale, Fla., and it has been growing rapidly since then. Mr. Mumford, with five

others, the Christian Growth Ministries. Another large umbrella organization, the Christian Restoration Ministries, is based in Wheaton, Md.

Other ultrafundamentalist groups are said to be situated throughout the country, although many are unknown in their communities because the leaders keep their operations quiet.

Most of the new groups, according to the scholars, have rituals and doctrines that are common among fundamentalists, such as the belief that the Bible is literally true. Services often feature singing, shouting and speaking in tongues.

Chosen Leader for Chosen People

The most common thread among the new groups, the scholars say, is domination by an authoritarian figure, usually a man, who says he has a special relationship with God; in some cases, the leader claims divinity himself. Generally, according to the scholars, the leaders contend that their followers are a chosen people and that God has placed the leader on earth as their shepherd, to lead them to heaven.

Dr. Enroth said most leaders required followers to disclose intimate details of their lives and submit to him regarding all facets of their lives, including marriage, job changes and finances.

Most, Dr. Enroth said, require members to socialize only with other members and to keep distance from relatives who have not joined. "The leaders tell the people what to read and what to watch on television, who their friends should be," he said.

Dr. Enroth said the absolute authority wielded by leaders of some of the new groups reminded him of that exerted by the Rev. Jim Jones, founder of the People's Temple. In 1978, Mr. Jones, saying he was a victim of religious persecution, led his followers from San Francisco to Guyana, where more than 900 ultimately died as a result of mass suicides and murders committed at his urging. Mr. Enroth said a few, but not most, of the new groups might have the same potential for violence.

Most of the information about the ultrafundamentalist organizations has been relayed to anti-cult groups and academic specialists in the field by people who have left the religious groups. Some specialists have attended group activities, sometimes posing as converts.

The Community Chapel and Bible Training Center occupies a sprawling complex of buildings in suburban

Burien near the Seattle-Tacoma International Airport.

Friends say that in the late 1960's, Mr. Barnett, an Idaho-born aerospace engineer at the Boeing Company who was a part-time Assembly of God preacher, decided to establish his own church because of a doctrinal dispute. Unlike most Christian sects, he argued that God is singular, consisting only of Jesus, not a Trinity consisting of God the Father, the Son, and the Holy Ghost.

In the 1970's, Mr. Barnett, who is described as an eloquent speaker, began to attract more and more converts from the Seattle suburbs and opened 20 small satellite groups in other communities and states, former members say. As his following grew, many clerics in this area began to question his style.

'Everything Became a Demon'

"What we were hearing troubled me — he was demanding full and total allegiance," said George Page, pastor of a nearby Assembly of God congregation. He said he was most concerned by what he termed Mr. Barnett's "obsession with demons" and assertions that his church could exorcise them.

"Everything became a demon — if you had a headache, you had a demon," Mr. Page said, adding that by instilling enormous fear of demons among parishioners the church gained virtually total control over them. "It is my conviction he was using brainwashing techniques from the beginning."

In an interview, one former member described herself as an "ex-hippie" who had joined the church in hope that it would help her stop using illegal drugs. "For a while," she said, the emotional rituals "gave me the same kind of high I got from drugs."

"It was like I was in an hypnotic trance," she said. "For somebody who was weak and didn't have much self-confidence, it was something to grab onto." But in time, she said, she had an affair with the pastor, her marriage collapsed and "I had a complete nervous breakdown."

'Dancing Before the Lord'

Last year, former members say Mr. Barnett, who is 56 years old, introduced a new ritual, "Dancing Before the Lord." He ordered followers to dance with spouses of other members as their "spiritual connection."

The idea, he preached, was to allow "connected" couples to express the love of Christ and the unity of His church by putting their spirits together.

er. Although his sermons stressed that the connecting relationships should not become sexual in nature, former members say sexual trysts became a regular occurrence both during and after church meetings.

Carmyn Peterson, Mr. Barnett's only daughter, is one of at least two dozen members who blame the practice for ending their marriages, according to Mr. Page and other clerics who have counseled some of them. In court papers filed in connection with her pending divorce, she said:

"Spiritual connections involve two adults, generally male and female of two separate marriages, gazing into each others' eyes, dancing, holding hands, spending an enormous amount of time together and with some kissing, fondling one another, etc.; the bottom line is that when someone develops a spiritual connection, they usually fall in love."

Last month, prosecutors in Portland, Ore., say, Jan Cole, a 35-year-old who had left the Seattle area chapel, admitted drowning her 5-year-old daughter in a bathroom at a Portland hotel out of fear that if the child grew up she would be possessed by demons. A murder charge is pending, and a Portland judge ordered psychiatric treatment for Mrs. Cole.

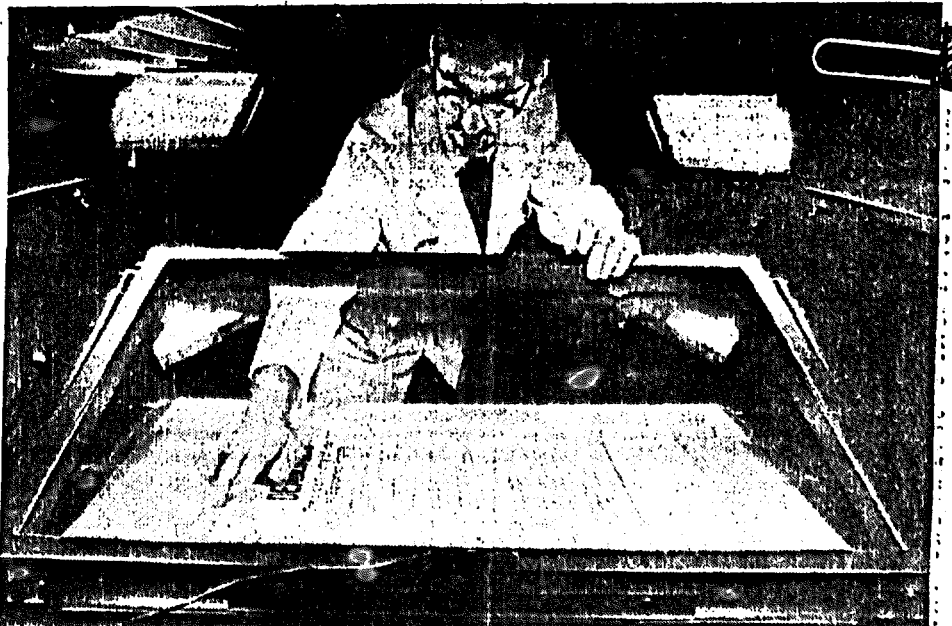
'Dancing and Kissing'

Dr. Enroth said that on a recent visit to a chapel meeting he saw "30 or 40 couples" locked in kissing embraces in one part of the room. As this was going on, he said, Mr. Barnett was saying that former members and outsiders were persecuting him and his followers as the early Christians were.

"It was just unbelievable, the ecstasy," Dr. Enroth said. "People were dancing, staring with glazed eyes into other people's eyes and kissing during the sermon." He said that as the pitch of dancing and kissing grew, "moes and more people got up and started dancing and kissing."

At services Friday nights and Sundays, armed guards stand watch against reporters, dissident members and critics, and some former members say they have heard that Mr. Barnett is considering moving the church away from the persecution he discerns. "I think there is a terrible, terrible, terrible danger that something could go wrong," said a former close associate of the pastor.

Dr. Enroth agreed, saying, "I see the possibility of some real violence."



PRINTING PRESS CONFERENCE: Tom Tarnhak demonstrates a system for making plates for printing presses at United Press International.

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Ex-elder challenges pastor

A former elder at the Community Chapel and Bible Training Center has challenged the church's pastor to a public debate over a doctrine blamed by some for turmoil among the 2,000 members of the Burien congregation.

In a letter written last week, George Alberts, former minister of counseling, proposed that he and Pastor Donald Lee Barnett debate whether "spiritual connections are a move of God."

Barnett, founder and head of the independent, Pentecostal church, teaches that a closer union with God can be realized by

dancing, embracing and sharing time with someone else's mate. While such "connections" are supposed to be asexual, critics claim they have torn families apart and caused mental distress.

Alberts and his wife wrote Barnett that they could no longer accept the connection teaching.

But "it is not our intent to fight the church nor to recruit others to our views," the letter said.

Instead, Alberts proposes that he and Mike Sabourin, another ex-Chapel elder, debate Barnett and an elder of the pastor's choice.

ALBERTS, GEORGE

Former Minister of Counseling

Church elder defends silence on child's sex-abuse report

by Don Duncan
Times staff reporter

E. Scott Hartley, a senior elder at Burien Community Chapel and Bible Training Center, told a Superior Court jury yesterday he didn't report a case of alleged child sexual-abuse because he thought it could be handled within the church and by the principals living by "the word of God."

Hartley said he had reservations about the veracity of the 12-year-old girl who told him her stepfather had sexually abused her, and even when the girl passed a lie-detector test given at his request, he still was not convinced she was telling the truth.

Hartley said he did, however, inform the stepfather after first hearing the allegations that he could no longer have contact with any female in the church under age 18. And Hartley said that when the stepfather spent a night at his home, Hartley was concerned about the safety of his daughters.

The Community Chapel elder is one of three leaders in the church to be charged with failure to report child abuse in different cases. One has been tried and convicted, and his case is on appeal. The other has yet to be tried.

The stepfather went on trial for sexually abusing his daughter after her mother informed police. He was convicted and is appealing.

Hartley's case, which is being heard by Superior Court Judge Faith Enyeart, is expected to go to

the jury Monday, after further testimony by Hartley and a possible appearance by the stepfather.

Deputy Prosecutor Kate Flack challenged Hartley's right to call himself a minister and thereby claim that what was told to him in a counseling session need not be divulged to authorities.

He was, she said, primarily a budget director for the church and a member of the board of elders. He did not perform marriages (he said he did not choose to do so), and he was not listed in the church register as an ordained minister.

Hartley insisted that he was, and is, a minister of the church that ordained him an elder.

Flack said the Community Chapel so orchestrates the lives of its parishioners that the mother of the abused girl called Hartley to ask permission to turn up the heat in her home when her husband refused to do.

The church teaches that children must be submissive to parents and wives to their husbands.

For that reason and Hartley's assurances to mother and daughter that he would take care of the child-molesting charges, the mother relied completely on Hartley to make the right decision concerning her husband's child abuse, Flack said.

Asked why he did not give an eight-page, typewritten transcript of the 12-year-old's allegations to Detective Lawrence Daly when he was investigating the case, Hartley said he chose not to mention the

transcript and, instead, wrote out a two-page report for the officer "because he already knew most of the things."

Under cross-examination, Hartley conceded that his report omitted several instances of the stepfather's sexual abuse of the girl.

Hartley testified that he told no one of the girl's allegations of sexual abuse except his own wife, Bonnie, and Barbara Barnett, wife of the church's pastor, the Rev. Donald Barnett.

"God teaches you don't gossip or pass words along that are considered confidential," Hartley told the court. "Possible incest," he said, "is a spiritual matter that can be handled by the word of God."

Hartley said he didn't know whom to believe in the matter — a girl "telling me these stories, and knowing she had a reputation for making things up in school, for telling stories and being a liar," or her stepfather, who denied the allegations.

Hartley said he was also troubled by the girl's rebellion against such authorities as her parents and the Christian school run by Community Chapel.

"It's an ungodly aspect, against the word of God," Hartley said. "You are not to rebel against family and authority."

Asked why, with mounting evidence that the girl was telling the truth, he still did not act, Hartley

said, "Being a minister, I did not have a mandate to report it. I live

by the Bible. I work and breathe it. You don't go and blab confidential

things. You live by the word of God."

CONT'D

Deputy Prosecutor Kate Flack says Hartley is merely an employee of the church, not its pastor, and in his occasional role as a counselor of parishioners has no immunity from telling authorities about suspected child abuse.

The mother said she respected Hartley as an elder of the church, but never called him "Reverend." As for his being a "minister," she said, she felt that all members of the church who did counseling were "ministers."

"I was even a minister myself," she said, when she was a paid kindergarten teacher and high-school counselor for the church.

Impatient with what she thought was an attempt by Hartley to shield her husband, the mother of the abused girl said that after nearly five months had elapsed she called King County police to report the sexual abuse of her daughter.

Lawrence Daly, a detective with King County's special-assault unit, said he met with Hartley after being assigned to the case, and the first thing Hartley asked him was "who reported this?"

Daly said Hartley at no time identified himself as a minister or Reverend. "He just called himself Scott Hartley."

Daly said he told Hartley he was doing an investigation, "and, myself, being a Catholic boy, and understanding priest-penitent law, wondered how could he not do it (report the abuse)."

Daly said Hartley responded with a "kind of laugh" and then replied, "I really never have understood if I'm to report or not. I don't know whether I'm exempt under the law or not."

The case may go to the jury late Monday.

by Don Duncan
Times staff reporter

A woman whose husband sexually abused her daughter told a Superior Court jury that a senior elder of the Burien Community Chapel and Bible Training Center convinced her the matter would be dealt with within the church and that she need not inform law-enforcement agencies.

In testimony yesterday, the woman said leaders of the fundamentalist church orchestrated her family's life, telling her husband to leave the home after child-abuse allegations were made and telling her where she could move with her daughter and a niece to get away from her estranged husband.

In a shaky voice, the woman said that at one time, when her daughter and the niece refused to attend the Burien church because they didn't want to face her husband, "I thought they would go to hell."

Her testimony yesterday, at times halting, frequently interrupted by objections from defense counsel, came on the opening day of the trial of E. Scott Hartley, a senior elder of Burien Chapel, who is charged with failing to report child abuse.

A key point in the case, being heard by Superior Court Judge Faith Enyeart, is whether Hartley is an ordained minister or simply an elder in the church.

Deputy Prosecutor Kate Flack refers to Hartley as "defendant Hartley."

Defense attorney Jan Olson calls him "Reverend Hartley."

The woman who was counseled by Hartley said she had never heard him called "Reverend." She said Hartley had been assigned by the church to counsel her and her husband through marital difficulties.

The church, she said, was the core of her life. She taught kindergarten, counseled youth and was active in retreats. She said she feared being banned from the church if she went against its teachings and the advice of its leaders.

Her husband, she told the court, was physically abusive with her daughter, once bloodying her nose. He also told his wife she shouldn't tell her daughter and a niece who lived with the family that she loved them, because that would undermine his authority.

The woman said she suspected sexual abuse in the home when her husband said he had dreamed of having sexual intercourse with his niece. He told her he thought he should get the girl pregnant so she could bear his child and love him more.

The woman said she told this to Hartley, who advised "discretion" in the matter and said it would be dealt with within the church. She said Hartley undertook counseling her and her husband.

In time, the woman said, she learned the full story of the sexual abuse of her daughter.

Her husband, she learned, had begun molesting his stepdaughter when the girl was 4½ years old — soon after the couple's marriage. In later years, the woman said, her husband watched his teen-age stepdaughter and niece undress for bed. He would go into the bathroom with them when they bathed. She also learned, she said, that her husband fondled her daughter's breasts, kissed her intimately in bed and simulated sexual intercourse.



E. Scott Hartley
Senior elder of Burien Chapel

The woman said she told these things to Hartley, who said he would talk with the husband and get his side of the story. He later told the woman that her husband denied the allegations.

Nonetheless, Barbara Barnett, the wife of the church's pastor, the Rev. Donald Barnett, ordered the husband to leave the home after a personal visit from the daughter and niece. The husband complied.

At Hartley's suggestion, the woman said, her daughter took a lie-detector test, relating her allegations of sexual abuse. She passed, the woman said, and Hartley was notified.

"I asked Scott (Hartley) if (her

husband) ... was going to be put out of the church," the woman told the court. "I said I couldn't understand why he was still in the church."

Her husband eventually took a lie-detector test about the abuse and failed.

Without waiting this time for Hartley to act, the woman said, she notified authorities of the sexual-abuse allegations.

Her husband — whom she has divorced — was charged, tried and found guilty of child abuse. He has appealed.

In his opening statement to the jury, Hartley's defense attorney said the senior elder of the church was functioning as a minister, not a social worker, and his parishioner-minister relationship precluded going to authorities with information about alleged sexual abuse unless he was convinced that was the best way to handle the matter.

Furthermore, the attorney said, Hartley didn't know whether to believe the girl or her stepfather, because the girl "had a reputation in the church community for being an untruthful person."

Under state law, social workers, nurses, school workers and counselors are required to report to authorities within 24 hours any instance of child abuse they have "reasonable cause" to believe might have occurred.

Two other counselors in the Burien church — Louis Mensorides, 44, and David Motherwell, 32 — also have been charged with failing to report child abuse.

Mensorides' case was heard by Judge Enyeart without a jury. He was found guilty of violating state law by not reporting possible child abuse involving the two small sons of a couple who were members of the church.

Motherwell's case has yet to come to trial.

Elder urged 'discretion,' child-abuse jury is told

+ F 2 The Seattle Times Thursday, September 10, 1987

+ B 2 The Seattle Times Friday, September 11, 1987

She told elder of abuse, says girl

Hartley 'protected,' defense contends

by Don Duncan
Times staff reporter

Her voice barely audible at times, a teen-age girl testified in King County Superior Court yesterday that when she was 12 she went to a senior elder of the Burien Community Chapel and Bible Training Center and told him her stepfather had been sexually and physically abusing her since she was 4½ years old.

The girl said she went to the elder at the request of her mother, "and because he was really high up in the church and if I told him these things that would be the end of it."

She described the abuses, which included exposure, fondling and simulated intercourse, and said her stepfather warned her not to tell and sometimes struck her on the head.

E. Scott Hartley, the man in whom she confided, did not go to authorities. On trial for failure to report child abuse, he is expected to take the stand on his own behalf Monday.

Hartley is one of three leaders of the Burien church charged with failing to report child abuse. Lewis Mensorides has been tried and found guilty. His conviction is being appealed. The case of David Motherwell has yet to be heard.

Hartley's case is being tried before Superior Court Judge Faith Enyeart.

Jan Olson, Hartley's attorney, contends that Hartley is a minister and, unlike teachers, social workers and others who must by law report suspected child abuse, is protected by a priest-penitent relationship.

CON'T

Church worker failed to report child abuse, says prosecution

by Anne Christensen
Times staff reporter

A counselor at a Burien-area church never told authorities that an 8-year-old girl in the congregation was being sexually abused, although he advised the girl's mother to report her suspicions, a judge was told.

David Motherwell, 32, a counselor at the controversial Community Chapel, went on trial yesterday in King County Superior Court on a charge that he failed to report child abuse by a church member.

In opening statements, Deputy Prosecutor Kate Flack said Motherwell was counseling a married couple in the church when the wife told him her husband was sexually molesting their daughter.

Motherwell told the woman to report the abuse to police, but never contacted authorities himself in the more than six months he counseled the family, Flack said.

When confronted by his wife and Motherwell in January 1986, the husband admitted to molesting the girl but said it wouldn't happen again, Flack said.

The woman finally contacted child-protection officials after fleeing with her children to Oregon in May 1986. The father later pleaded guilty to indecent liberties.

Defense attorney James Leach said Motherwell was acting as a clergyman when he counseled the family, and said clergy were specifically exempt from the reporting law.

Also, Leach said. "The evidence will show the defendant did cause the matter to be reported, while he didn't report it himself."

But Flack said Motherwell was not licensed as a minister until January 1986, months after he was first told of the abuse. He therefore was acting as a social worker and required by law to report the suspected abuse.

Motherwell is the third Community Chapel employee to be charged for failing to report child abuse. Louis Menonides, a counselor, and E. Scott Hartley, a minister and counselor, were convicted earlier this month in separate trials.

Motherwell waived a jury trial, so the case is being heard by Judge

John Darrah.

Community Chapel, a fundamentalist, charismatic church, has been wracked by conflict in the past two years, many members claiming that its teachings have broken up their marriages and led to emotional trauma.

Before the trial opened, Leach argued to dismiss the charge, saying that requiring churches to

report on "pastoral" counseling was an unconstitutional intrusion into the exercise of religion.

But Darrah ruled that the state's compelling interest in protecting children justified requiring social workers, even those employed by a church, to report suspected abuse, adding that the Legislature had taken that issue into account when passing the law.

Third member of Burien church is convicted

A third member of the Community Chapel Church in Burien was found guilty today of failing to report a case of child abuse.

David Motherwell, 32, a counselor at the fundamentalist church, knew for months that an 8-year-old girl was being molested by her father but failed to tell authorities, Judge John Darrah ruled.

After the non-jury trial, Darrah rejected arguments that Motherwell was a clergyman exempted from laws requiring doctors, social workers and others to report suspected child-abuse cases.

Motherwell was counseling the girl's parents about marriage problems when the mother told him about the suspected abuse. Motherwell told the mother to call police or Children's Protective Services but never took any steps himself.

The case was not reported until the mother and her children fled to Oregon in May 1986.

Another counselor and a minister from Community Chapel were convicted earlier this month on similar charges.

THE SEATTLE TIMES

FRIDAY,

SEPTEMBER 25, 1987

Jury convicts Harley, says he wasn't minister

By RANDY BLACK

Edward Scott Hartley testified he always believed he was a minister in the Community Chapel and Bible Training Center, and that status gave him the right to conduct his own investigation of child abuse charges before reporting them to authorities.

But members of a King County jury said it found no evidence Hartley had ever been ordained by the controversial Manhattan-area church. The jury took just more than three hours to convict Hartley of failing to report child abuse.

Hartley, 45, showed no emotion when the jury read the verdict Wednesday morning. He and his wife, Bonnie, walked straightbacked from the courtroom without comment afterwards.

Jurors answered a special question, put to it by defense attorney Jan Olson, saying they had determined Hartley was not a minister. Members of the clergy are exempt from a 1977 law which requires professionals working with children to report suspicion of abuse.

"We thought he was a decent man who did what he thought was best," said jury foreman Walt Hoffner. "We found no evidence whatsoever that he was a minister. In our minds, what he was doing was as a social worker."

HARTLEY WAS THE second of three Community Chapel employees to be convicted of the charge, which carries a possible penalty of one year in jail and a \$5,000 fine.

Lewis Mensonides was found guilty by Superior Court Judge Faith Enyeart two weeks ago after a non-jury trial.

Another employee of the Chapel's counseling center, David Motherwell, is set to go on trial this week.

The jury heard from Hartley and the mother of a 12-year-old girl that the girl told Hartley that her stepfather had molested her from the time she was four years old.

After the mother, Jean Harrington, brought her suspicions to Hartley's attention, she brought the girl in to a counseling session with Hartley in October, 1985. The girl told Hartley about the abuse in detail.

But Hartley did not report the abuse to authorities. He said he told Harrington to report it in February, 1986, after the stepfather, Thomas Konopka, failed a lie detector test. The girl had passed her own test previously.

Konopka was found guilty of three counts of indecent liberties last year. He is appealing the verdict.

HARRINGTON TESTIFIED that Hartley never told her to report the abuse. Detective Lawrence Daly, who investigated the cases against Konopka and Hartley, testified that when he first met with Hartley to ask him about the charges against Konopka, Hartley asked him, "Who reported this?"

Hartley testified he didn't report the abuse because he didn't believe the girl was telling the truth and because he didn't think he was required to report.

The critical issue revolved around Hartley's role in the church. The law gives a specific exemption to "licensed and ordained ministers," but gives a broad definition to "social workers," who are required to report.

Deputy prosecutor Katherine M. Flack said Hartley fell within the definition, which says a social worker is one who, as part of their job, contributes to the health, welfare, safety or education of a child.

She argued that by providing a number of services to the Konopkas, including financial and marriage counseling, Hartley was acting as a social worker instead of as a minister.

SHE ALSO SAID there was no evidence Hartley had ever been ordained as anything but a senior elder in the church.

The law says that being a member of the clergy is a defense against the charge, but says the defendant must prove he is licensed or ordained.

"Defendant Hartley would like you to magically change his status from senior elder to pastor," Flack told jurors.

Olson argued that Harrington and the daughter believed Hartley was a minister when they went to him with the abuse allegations.

"It was absolutely clear to Jean Harrington that Reverend Hartley was a minister of the

gospel," Olson said. "When a minister calls and says, 'Turn on the heat,' suddenly that isn't done out of pastoral concern? Suddenly that isn't done out of ministerial love? Suddenly he becomes a social worker?"

Harrington testified at one point she asked Hartley for permission to turn up the heat in the Konopkas' house when her husband forbade it.

OLSON ASKED JURORS to realize the reason the

ministerial exemption was in the law.

"Isn't it because we believe there is something sacred about when a person needs to come to a minister in a private setting, when a person may need to bare their soul?" he said.

"The government should not barge in and tell a minister what he is and isn't doing," he said. "What is on trial here is a fundamental religious freedom."

But Flack argued there was no

evidence Hartley was ever a minister.

"There is no witness from the church who came in here and said, 'I am pastor Don Barnett and I ordained this man as a minister,'" she said.

"You have no evidence that this man deserves the protection of that part of the law.

Both attorneys made their points in subtle ways during the trial. Olson consistently called his client "Reverend Hartley."

Flack usually referred to him as "defendant Hartley."

JURY FOREMAN Hoffner said the jury argued longest over the definition of a social worker.

He said they were confused by the way the events unfolded between the time Hartley first knew about the abuse allegations and the time it was reported.

Hoffner said the jury finally realized there were several

times when they felt Hartley had enough reason to suspect that the girl's allegations were true. The law requires that abuse be reported within 48 hours after the time a social worker has reason to believe there was abuse.

He also said the jury felt Hartley should have reported the abuse, even if he had been a minister.

"We felt he waited too long to make a report," Hoffner said.

Cole

Northwest

Minister's teachings wrack church

Move of God' linked to divorces, suicides, alleged murder of child

By Carol M. Ostrom
Times religion reporter

To many members of Community Chapel and Bible Training Center, 37-year-old Janet Cole seemed to be the perfect Christian woman — sweet, graceful and feisty.

But after 18 years as a member of the large Pentecostal church, where members are encouraged to establish strong "spiritual connections" with other people and demons are regularly blamed for emotional turmoil, Cole apparently became convinced that she and her daughter were possessed by unshakable demons.

On March 20, Cole drove to Portland and drowned 5-year-old Brittany in a motel bathtub, according to a prosecutor who has charged her with murder.

The tragedy of Janet and Brittany Cole is not the only trouble that has recently beset the 3,500-member South End church, a sprawling, \$9 million complex that

began as a small, fundamentalist gathering in the late '60s.

Since mid-December, two chapel members have committed suicide, and a number of others, say former members, have come close.

Last month, police were called to the scene and a woman was dragged out of church in handcuffs after she refused to leave. She says she was thrown out of the church because of a problem with a church counselor. Church officials said she was dismissed, or disfellowshipped, for attacking recent church practices and for not following advice.

A number of church principals, including counselors, prominent elders and a couple who helped found Community Chapel, have left the church in the past few months over church practices prescribed by its pastor. Some former church members estimated 300 have left within the last several months.

The upheaval has wracked the



Pastor Donald Lee Barnett is the spiritual leader of the Community Chapel and Bible Training Center, a 3,500-member church in the South End.

church's family — and that of its powerful pastor, Donald Lee Barnett. His son and daughter-in-law have left the church; a brother in Idaho, also a pastor, now refuses to refer students to the Chapel's Bible College and says he's no longer in communication with his brother.

"I'm praying for that church and for my brother that God will open their eyes," said Idaho Pastor Bob Barnett.

In January, an Olympia satellite church severed relations, taking a new name.

At Community Chapel, some believe that God is testing the congregation, weeding out those with weak faith. But others, including disgruntled and former members, think recent events are the inevitable result of doctrine es-

posed by Barnett, an imposing, silver-haired 56-year-old former Assembly of God minister.

In the past year, Barnett has encouraged his followers to make spiritual connections with each other — through dancing, hugging and kissing. Such connections, Barnett has said, are necessary to open members of the congregation to pure, spiritual love and the possibility of complete unity with God.

Barnett's teaching, also referred to as "the move of God," began as simple joy-filled solo dancing in the church. Gradually, former church members say, the dancers became couples, married people often pairing with others' spouses.

Barnett, who said he had a revelation convincing him that this



Janet Cole, shown here at her 1977 wedding, has been accused of drowning her 5-year-old daughter, a girl apparently convinced the girl was possessed by demons.

was God's will, encouraged church members to see the spirit of God's love in each other. But even his critics say he never condoned adultery. In fact, he has attempted to set guidelines for the connections several times.

Neither Barnett nor other church officials would be interviewed. But in a March 29 sermon tape-recorded by church members and given to The Times, Barnett told his congregation that if spiritual connections were carnal, he, too, would object to them. Barnett's sermons are routinely tape-recorded by the church.

"God has told us to love one another fervently. . . . That's what we're trying to do. We're trying to obey God's word," he told the congregation.

But others say that to expect

such intense feelings to remain spiritual and not cause jealousy is simply unrealistic.

"It's not that he's preaching adultery. It's the very nature of the thing which can only lead to adultery," said Cheryl, who was disfellowshipped in March after she and her husband wrote Barnett a letter saying they disapproved of the doctrine. Like many others, Cheryl asked that her real name be withheld for fear of harassment and loss of contact with those still in the church.

In several private rooms in the church, ex-members said, those with intense connections, express their unconditional spiritual love, often staring into each others' eyes

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CHURCH

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and saying sweet things to each other, and sometimes embracing warmly.

"There are a lot of people who are on the brink of insanity in there because the whole system is schizophrenic," Cheryl said. "People who really love the Bible can't really reconcile going off and dancing and hugging and kissing someone other than their mate. They have to go through real gymnastics to reconcile that."

"We were told to release our mates to other people — their spirits didn't belong to us, and we had no right to deny them other relationships," said Rosemary Guthrie, a 14-year church member who was a church counselor for 10 years.

Guthrie said her troubles with the church began last year, when her husband began to have a spiritual relationship with one of Guthrie's friends. It all began with the friend praying for Guthrie's husband.

"I got counsel from the pastor's wife (Barbara Barnett). She encouraged me to let go, and it drove me to the point of insanity over the summer. I was screaming and crying for hours on end — totally out of control of my emotions," Guthrie said.

"Lynn," who asked that her real name not be used, recently left the church after 16 years.

"I really love my husband," she said. "All of a sudden I'm being told that sister so-and-so is going to minister to him because I'm not good enough. ... I'm watching all my friends' marriages fall apart all around me. There have been numerous adultery cases, and they just blame it on the devil. But it's not just the devil, it's their teaching," she concluded.

Dozens of separations and divorces have occurred in the recent past within the church, former church members say. And while that may be the norm, "in the world," Lynn said, "it's not in spirit-filled, born-again churches."

Many said they were deeply afraid to leave the church at first. Typically, those coming into the church are "divorced from their former values and have their values replaced," said Harry Stegman, a former Chapel Bible College teacher who now helps counsel those coming out of the church. In addition, he said, Chapelites cut themselves off from former associations and become taken up in a desire to ready themselves to

after Scott's husband established a spiritual connection and began spending more and more time at the church. Scott, a shy, insecure 25-year-old, became increasingly despondent, Hamm said.

"The pressure started adding. People began to tell her that she was being demonically inspired to keep her husband from getting what he needed," Hamm said. Then, Scott's husband got pneumonia, Hamm said, and his connection moved in to help tend him.

Scott asked for counseling at the church, and for a time, moved out to stay with friends, Hamm said.

The week before she committed suicide, Guthrie said, Kelly Scott asked two friends to pray with her all day about her "demonic problems" such as her jealousy.

"Their philosophy is pray and believe God. Whatever is negative is a demon and if they don't leave, it's because you're unwilling or you have sin in your life and this is God's way of purging you," Hamm said.

After Scott killed herself, Barnett told the congregation that her death had nothing to do with the "move of God" teachings. But many Chapel critics dispute that. "To have Pastor Barnett say that it had nothing to do with the move is asinine," Hamm said. "It had everything to do with the move. To have another woman come in and take over right under your nose!"

Problems in adjusting to the practice of spiritual connections also figured heavily in the suicide of church member Scott Linderon, 34, who shot himself in the head March 10, friends said.

But it was Janet Cole's actions that shocked many Chapelites the most.

"She was the epitome of Christian womanly grace, beauty, very sensible. She was teaching a Bible study for weeks on reverencing your husband that many women went to and got lots of help," said Guthrie.

But the "move of God" simply went against her conscience, said another friend. "She was pushed against her conscience until her mind snapped," she said. "She was told her mind was riddled with demons."

Cole is now under 24-hour psychiatric care at Oregon Health Sciences Center, said Bob Leineweber, Multnomah County deputy district attorney.

About two months ago, Cole contacted "Mark," a former counselor at Community Chapel who had known Cole since she first joined in the early '70s. She wanted to discuss medications and the

husband, Rick, said in a speech tape-recorded at the church that what happened with his wife didn't have anything to do with "what God has been doing in our body, knitting us together and unifying us."

"I have been wrestling demons ... in my wife for 7 months," he said in his speech.

About Brittany's death, he said, "I don't despair for my daughter. There is a deep agony inside that I know hasn't fully hit yet. ... My daughter delighted in Jesus. ... And all I can do is see her dancing before him here tonight. It brings such joy to my soul."

"I will never have to watch her be tempted with the world. I will never have to watch her backslide," he said.

The devil is at work whenever God begins to draw his people closer, Cole said. "We're in a war chariot. Life is real, life is dangerous, as our pastor has said. And we have a war to fight. Heaven is on the other side. Thank you Jesus that Brittany is on the other side."

Cole refused to be interviewed about his wife or daughter, or to say whether he had seen her since she left for Portland.

And although Barnett, too, refused to speak to The Times, he has insisted in recent sermons that Brittany Cole's death and the suicides have had nothing to do with the "move of God" emphasizing spiritual connections.

"This other kind of love is heavenly love, this other-world love, is love so great that the world will marvel and know that you are the sons of God the father," Barnett preached.

Answering critics who said the spiritual connections teaching was not scriptural, Barnett denounced their logic as "full of holes."

"Where in the New Testament does it say that you should stand up and clap your hands? No place. Where does it say you can dance solo? No place. ... There's a lot of things it doesn't say you can do," Barnett said.

And even now, in the midst of turmoil, many critics say they understand why the spiritual connections practice has support.

In the connecting, says Mark, "people were beginning to experience and feel what we all want — love and acceptance. They were beginning to experience something that felt good, and they felt free in it."

Wives and husbands were encouraged to become close to their spouse's connection, and many apparently did, despite jealousy.

Guthrie said she became very close to her husband's connection

become ultimately connected to Jesus Christ. They also believe, Stegman said, that to differ with the pastor means cutting off their chances of going to heaven.

Like others, Guthrie said she believed if she left the church she would be spiritually lost. And she didn't want to divorce her husband, the father of her three children.

"I was going mad," Guthrie said. "All of my conflicts and emotions were attributed to demons."

Kelly Scott had conflicts and emotional difficulties, too, and like Guthrie, she was told she needed to purge her demons. But on Dec. 14, Scott gave up, shooting herself in the head with one of her husband's weapons.

Kim Hamm, who left the church about six weeks ago, lived

possibility of seeing a psychiatrist, he said. Several people close to Cole said she was having difficulty with spiritual connections she and her husband established.

But her husband told Mark he was against outside help, Mark said. In a conversation with Mark one evening, Cole's husband told Mark that his wife's problems were caused by demons, Mark said.

And Janet Cole told Mark that those in the church who tried to help her simply tried to cast out her demons, but that the demons only seemed to get a better grip on her.

Mark said Janet Cole told him she was afraid Brittany had similar demons. Because of church teaching that a child who dies at a young age will automatically go to heaven, Cole felt she was saving

— "I loved her desperately." Kelly Scott, friends said, was also close to her husband's connection.

Many members and former members say they're speaking out only because they're afraid something they deeply value is taking a dangerous twist.

"I actually, honestly did meet God at Community Chapel," says Guthrie. "God actually was there at that time. And I was willing to make any sacrifice in my personal life to have him."

Jane, who left the church after seven years, says she still loves the church and the people there — even though most won't speak to her now that she's been disfellowshipped.

"The thing about the people of Community Chapel is they genuinely love God," she says. But now, she adds, "I'm kind of in the place

Cole

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LAGESCHULTE & CORNELL, P.S.

ORIGINAL KARGANIS & AUGER

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

SANDY EHRlich et al.

Plaintiff,

v.

RALPH ALSKOG et al.

Defendants.

NO. 86-2-18429-5

MOTION FOR PREASSIGNMENT
AND EARLY TRIAL DATE

COMES NOW Plaintiff's, by and through their attorneys
of record, Richard H. Adler of Adler, Giersch and Read, P.S.,
and John Messina of Messina, Duffy, and respectfully moves this
Court pursuant to Local Rule 40, to set the above-entiled matter
for an early trial date and have a King County Superior Court
Judge preassigned to this case.

This motion is based upon the files and records herein
and upon the attached declaration and attachments filed in
support thereof.

DATED this 31 day of October, 1987.

Respectfully submitted,

ADLER, GIERSCH AND READ, P.S.



Richard H. Adler
Attorney for Plaintiffs

MOTION FOR PREASSIGNMENT
AND EARLY TRIAL DATE

LAW OFFICES OF
ADLER, GIERSCH AND READ, P.S.
1621 SMITH TOWER
SEATTLE, WA 98104
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MOREN, LAGESCHULTE & CORNELI



SUPERIOR COURT OF WASHINGTON COUNTY OF

KARGIANIS & AUSTIN

NO. 86-2-18429-5

SANDY EHRLICH et al. Plaintiffs, v. RALPH ALSKOG et al. Defendants.

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: November 16, 1987 Day of Week Monday Nature of Motion: Motion for Preassignment and Early Trial Date

DESIGNATED CALENDAR

- Civil Motion (LR 0.7) (9:30) FAMILY LAW MOTION (LR 0.5(b) LR 94.04 (W291) Summary Judgment (LR 56) (9:30) Supplemental Proceeding (LR 69) (1:30) Presiding Judge (Trial Date Motions Only) (11:15 or 1:30 Daily) Time of Hearing: 1:30 p.m. Domestic Motion (9:30) Scaled File Motion (1:30) Support Motion (1:30) Modification (1:30)

EX PARTE MOTION (LR 0.9(b)) (W623) The following motions are heard 9:00-12:00 and 1:30-4:15:

- Adoption Time of Hearing: Receivership (LR 66) (2:00) Dissolution Time of Hearing: Scaled File Motion (9:30) Ex Parte Motion Time of Hearing: Probate Time of Hearing:

DEPARTMENTAL HEARINGS (LR 40(b))

Special Setting Before Judge/Commissioner: Time of Hearing: Room

Richard H. Adler Typed Name: OF: ADLER, GIERSCH AND READ, P.S. Attorney for: Plaintiffs Telephone: 682-4267

DATED: October 30, 1987

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

NOTE FOR MOTION CALENDAR (NTMTDK) SC Form JO-138 5/87

LAW OFFICES OF ADLER, GIERSCH AND READ, P.S. 1621 SMITH TOWER SEATTLE, WA 98104 (206) 682-4267

AEES 5/87

Handwritten signature

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Telephone: 472-6000
Attorney For: Plaintiffs

NAME:
Address:

Telephone:
Attorney For:

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SUPERIOR COURT OF WASHINGTON
COUNTY OF

RECEIVED MOREN,
LAGESCHULTE & CORNELL P.
NOV - 4 1987
KARGIANIS & AUSTIN

SANDY EHRLICH et al.
Plaintiffs,
v.
RALPH ALSKOG et al.
Defendants

NO. 86-2-18429-5

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: November 16, 1987 Day of Week Monday

Nature of Motion: Motion for Consolidation of Cause Numbers 86-2-18429-5 and 86-2-18176-8

DESIGNATED CALENDAR

- | | |
|---|--|
| <input type="checkbox"/> Civil Motion (LR 0.7) (9:30) | FAMILY LAW MOTION (LR 0.5(b) LR 94.04 (W291)) |
| <input type="checkbox"/> Summary Judgment (LR 56) (9:30) | |
| <input type="checkbox"/> Supplemental Proceeding (LR 69) (1:30) | |
| <input checked="" type="checkbox"/> Presiding Judge (Trial Date Motions Only) (11:15 or 1:30 Daily) | <input type="checkbox"/> Domestic Motion (9:30) |
| Time of Hearing: <u>1:30 p.m.</u> | <input type="checkbox"/> Sealed File Motion (1:30) |
| | <input type="checkbox"/> Support Motion (1:30) |
| | <input type="checkbox"/> Modification (1:30) |

EX PARTE MOTION (LR 0.9(b)) (W623)

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: _____ Room _____

Richard H. Adler
Typed Name:
OF: ADLER, GIERSCH AND READ, P.S.
Attorney for: Plaintiffs
Telephone: 682-4267

DATED: October 30, 1987

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

LAW OFFICES OF
ADLER, GIERSCH AND READ, P.S.
1621 SMITH TOWER
SEATTLE, WA 98104
(206) 682-4267

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

NAME: Michael Bond
Address: 800 Washington Bldg.
Seattle, Washington 98101

Telephone: 624-7990

Attorney For: Defendants

NAME: Micahel Bugni
Address: 11320 Roosevelt Way NE
Seattle, Washington 98125

Telephone: 633-1310

Attorney For: Defendants

NAME: Jeff Campiche
Kargianis & Austin
Address: 4700 Columbia Center
Seattle, Washington 98104

Telephone: 624-5370

Attorney for: Plaintiffs

NAME: John Messina
Messina Duffy
Address: 4802 Tacoma Mall Blvd.
Tacoma, Washington 98409

Telephone: 472-6000

Attorney For: Plaintiffs

NAME:

Address:

Telephone:

Attorney For:

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

3 SANDY EHRLICH and MICHAEL)
4 EHRLICH, wife and husband;) No. 86-2-18429-5
5 et al.,)
6 Plaintiffs,) NOTICE OF INTENT TO WITHDRAW
7 vs.)
8)
9 RALPH ALSKOG and ROSEMARY)
10 ALSKOG, husband and wife;)
11 et al.,)
12 Defendants.)

13 TO THE CLERK OF THE COURT, and

14 TO: SANDY EHRLICH & MICHAEL EHRLICH, Plaintiffs

15 TO: RICHARD H. ADLER, Attorney for Plaintiffs

16 PLEASE TAKE NOTICE THAT the undersigned intends to with-
17 draw as Attorney of Record for RALPH ALSKOG and ROSEMARY
18 ALSKOG, ROBERT HOWERTON, E. SCOTT HARTLEY, DONALD LEE
19 BARNETT and BARBARA BARNETT, COMMUNITY CHAPEL & BIBLE
20 TRAINING CENTER, "JOHN DOES" 1-4 and "JANE DOES" 1-4,
21 FIRST DOE CORPORATION and FIRST DOE PARTNERSHIP, the
22 above-named Defendants, as of the 16th day of November,
23 1987. Said date is at least 10 days after service of this
24 notice. This withdrawal shall be effective without order of
25 court unless an objection to the withdrawal is served upon
said withdrawing attorney prior to the date set forth in
this notice.

There is no scheduled trial date.

The last known address of the above-named Defendants are
as follows:

20 Ralph & Rosemary Alskog
21 18714 3rd Ave. S.
Seattle, WA 98148

Robert Howerton
3507 S. 40th
Tacoma, WA 98409

22 E. Scott Hartley
23 1208 S. 140th St.
Seattle, WA 98168

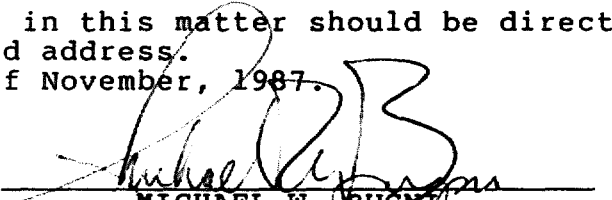
Donald Lee & Barbara Barnett
416 S.W. 192nd
Seattle, WA 98166

24 Community Chapel & Bible Training Center
25 18635 8th Ave. S.
Seattle, WA 98148

NOTICE OF INTENT TO WITHDRAW - 1

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and all future pleadings in this matter should be directed
to each Defendant at said address.
DATED this 6th day of November, 1987.


MICHAEL W. BUCHNY
of MOREN, LAGESCHULTE & CORNELL

NOTICE OF INTENT TO WITHDRAW - 2

MOREN, LAGESCHULTE & CORNELL, P.S.
ATTORNEYS AT LAW
ROOSEVELT-PINEHURST BUILDING
11320 ROOSEVELT WAY N.E.
SEATTLE, WASHINGTON 98125
(206) 385-5900

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NOV 12 4 3 07

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

PLADY

KATHRYN REYNOLDS,

Plaintiff,

v.
DEF04
E. SCOTT HARTLEY, and JANE DOE
HARTLEY, husband and wife; DONALD
LEE BARNETT and BARBARA BARNETT,
husband and wife; and "JOHN DOES"
1-4 and "JANE DOES" 1-4, husbands
and wives; COMMUNITY CHAPEL AND
BIBLE TRAINING CENTER; FIRST DOE
CORPORATION; and FIRST DOE
PARTNERSHIP,

Defendants.

NO. 86-2-18429-5

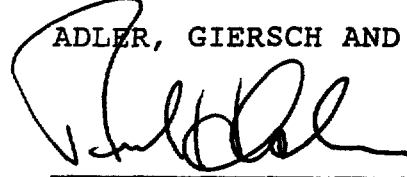
MOTION FOR VOLUNTARY
DISMISSAL AS TO
KATHRYN REYNOLDS

COMES NOW the Plaintiff, Kathryn Reynolds, by and through her attorney of record, Richard H. Adler of ADLER, GIERSCH & READ, and moves the Court for an order of voluntary dismissal pursuant to CR 41(A)(1)(b). This motion is based upon the affidavit of Plaintiff Kathryn Reynolds attached hereto and on the records and files herein.

24

DATED this 5th day of November, 1987.

ADLER, GIERSCH AND READ, P.S.



Richard H. Adler
Attorney for Plaintiff

59

STNOV12 P2 52

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

KATHRYN REYNOLDS,

Plaintiff,

v.

E. SCOTT HARTLEY, and JANE DOE
HARTLEY, husband and wife; DONALD
LEE BARNETT and BARBARA BARNETT,
husband and wife; and "JOHN DOES"
1-4 and "JANE DOES" 1-4, husbands
and wives; COMMUNITY CHAPEL AND
BIBLE TRAINING CENTER; FIRST DOE
CORPORATION; and FIRST DOE
PARTNERSHIP,

Defendants.

NO. 86-2-18429-5

ORDER FOR VOLUNTARY
DISMISSAL AS TO
KATHRYN REYNOLDS

On the foregoing motion and based upon the files and records herein, it is hereby

ORDERED that Plaintiff Kathryn Reynolds, a single person, be voluntarily dismissed from this lawsuit without prejudice.

DATED this 5 day of ^{November} ~~April~~, 1987.

[Handwritten Signature]

JUDGE/COURT COMMISSIONER

Presented by:
ADLER, GIERSCH AND READ, P.S.

[Handwritten Signature]

RICHARD H. ADLER
Attorney for Plaintiff

Carolyn C Davis
Legal Assistant
ORDER FOR VOLUNTARY DISMISSAL
Page 1 of 1

LAW OFFICES OF
ADLER, GIERSCH, AND READ, P.S.
1211 SMITH TOWER
SEATTLE, WA 98104
(206) 682-4267

55

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RECEIVED
NOV 13 1987

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NOV 12 1987

MOREN,
LAGESCHULTE & CORNELL, P.S.

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

SANDY EHRLICH and MICHAEL EHRLICH,)
wife and husband; et al.,)

NO. 86-2-18429-5

Plaitiffs,

v.

RALPH ALSKOG and ROSEMARY ALSKOG,)
husband nad wife; ROBERT HOWERTON)
and JANE DOE HOWERTON, husband and)

NOTICE OF INTENT TO WITHDRAW

wife; E. SCOTT HARTLEY and JANE)
DOE HARTLEY; DONALD LEE BARNETT)
and BARBARA BARNETT, husband and)
wife; COMMUNITY CHAPEL AND BIBLE)
TRAINING CENTER, a Washington)
corporation; "JOHN DOES" 1-4 and)
"JANE DOES" 1-4, husbands and)
wives; FIRST DOE CORPORATION; and)
FIRST DOE PARTNERSHIP,)

Defendants.

TO: CLERK OF THE COURT;

AND TO: SANDY EHRLICH and MICHAEL EHRLICH, et al, Plaintiffs;

AND TO: RICHARD H. ADLER, their Attorney.

PLEASE TAKE NOTICE that Michael J. Bond and Lee, Smart, Cook, Martin & Patterson, P.S., Inc., intend to withdraw as attorneys of record for defendants Ralph Alskog, Rosemary Alskog, Robert Howerton, "Jane Doe" Howerton, E. Scott Hartley, "Jane Doe" Hartley, Donald Lee Barnett, Barbara Barnett, "John Does" 1-4 and "Jane Does" 1-4, First doe Corporation and First Doe Partnership as of the 20th day of November, 1987. This withdrawal shall be effective without

NOTICE OF INTENT
TO WITHDRAW - 1

LEE, SMART, COOK, MARTIN & PATTERSON, P.S., INC.
ATTORNEYS AT LAW
800 WASHINGTON BUILDING
1325 FOURTH AVENUE
SEATTLE, WASHINGTON 98101
(206) 624-7990

NOV 13 1987

Handwritten initials/signature

1 order of court unless an objection to the withdrawal is served upon
2 said withdrawing attorneys prior to the date set forth in this notice.
3 The last known addresses of defendants are as follows:

4 Mr. & Mrs. Ralph & Rosemary Alskog
18714 Third Ave. So.
5 Seattle, Washington 98148

6 Robert P. Howerton
3507 South 40th
7 Tacoma, Washington 98409

8 E. Scott Hartley
18635 8th Ave. S.
9 Seattle, Washington 98148

10 Pastor Donald Lee Barnett
18635 8th Ave. So.
11 Seattle, Washington 98148

12 Barbara Barnett
217 South 168th Street
13 Seattle, Washington 98148

14 and all future pleadings in this matter should be directed to each
15 defendant at said address.

16 DATED this 9 day of November, 1987.

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

19 By Michael J. Bond
20 MICHAEL J. BOND
of Attorneys for Defendant
21 Community Chapel & Bible
Training Center

22
23
24
25 NOTICE OF INTENT
TO WITHDRAW - 2

LEE, SMART, COOK, MARTIN & PATTERSON, P.S., INC.
ATTORNEYS AT LAW
800 WASHINGTON BUILDING
1325 FOURTH AVENUE
SEATTLE, WASHINGTON 98101
(206) 624-7990



SUPERIOR COURT OF WASHINGTON
COUNTY OF KING

CIVIL TRACK 1

SANDY EHRLICH et al

Plaintiff,

vs.

RALPH ALSKOG et al

Defendant.

CLERK
No: 86-2-18429-5

ORDER ASSIGNING CASE TO CIVIL TRACK
I (CLERK'S ACTION REQUESTED)

THIS MATTER having been determined to meet the criteria for special assignment and it appearing that said case is not subject to arbitration; NOW THEREFORE

IT IS HEREBY ORDERED that the above-captioned case is assigned to JUDGE GARY LITTLE
Department Number 19 for management and disposition and that attorneys must confer with and contact the above judge within ten(10) court days from the date of this order to schedule the initial conference in this matter. If a trial date is currently set, and/or the case is noted for trial, it is hereby stricken.

DATED: 11/16/87, 1987

[Signature]
PRESIDING JUDGE

TO: RICHARD ADLER
ADLER, GERSCH & READ, P.S.
1621 SMITH TOWER
SEATTLE WA 98104
682-4267
Attorney for Plaintiffs

TO: MICHAEL BUGNI
11320 Roosevelt Way NE
Seattle WA 98125
633130

TO: JOHN MESSINA
MESSINA DUFFY
4802 Tacoma Mall Blvd.
Tacoma, WA 98409
472-6000

TO: MICHAEL BOND
900 Washington Bldg.
Seattle WA 98101
624-7990

TO: JEFF CAMACHO
Kengians, Austin & Erickson
4700 Columbia Center
Seattle WA 98104
624-5370

TO:

THIS FORM MUST BE FILED IN THE CLERK'S OFFICE, CALENDARS CONTROL Window #11, ROOM E-609

FILED

87 NOV 16 P 1: 29

SUPERIOR COURT
SEATTLE, WA

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

SANDY EHRLICH and MICHAEL EHRLICH,)
wife and husband; et al.,)

NO. 86-2-18429-5

Plaintiffs,)

v.)

MEMORANDUM OPPOSING AND JOINING
PLAINTIFFS' MOTIONS FOR
CONSOLIDATION, PRE-ASSIGNMENT,
AND EARLY TRIAL DATE

RALPH ALSKOG and ROSEMARY ALSKOG,)
husband and wife; et al.,)

Defendants.)

I.

THE COURT SHOULD CONTINUE THE HEARING OF THESE MATTERS

FOR THIRTY (30) DAYS.

Counsel for the individual defendants has served and filed a Notice of Intent to Withdraw. Counsel will remain as counsel for defendant Community Chapel & Bible Training Center. No formal opposition to withdrawal in Ehrlich has been served. It is imperative that the individual defendants obtain independent counsel and the hearing of these matters should be postponed for thirty (30) days until such time as the defendants have either obtained independent counsel or elected to proceed pro se.

II.

MOTION FOR CONSOLIDATION

Consolidation of the two cases is unwarranted and would cause substantial prejudice.

MEMO OPPOSING & JOINING
PLTFFS' MOTS/CONSOLIDATION,
PRE-ASSIGNMENT & EARLY TRIAL - 1

LEE, SMART, COOK, MARTIN & PATTERSON, P.S., INC.
ATTORNEYS AT LAW
600 WASHINGTON BUILDING
1325 FOURTH AVENUE
SEATTLE, WASHINGTON 98101
(206) 624-7980



SUPERIOR COURT OF WASHINGTON
COUNTY OF KING

PETITIONER

NO:

ORDER APPOINTING GUARDIAN AD LITEM
AT PUBLIC EXPENSE
(Family Court - Indigent Parties)

RESPONDENT

THIS MATTER having come on before the court upon a motion for the appointment of a Guardian Ad Litem to represent the best interests of the minor child, and the parties having satisfactorily shown an inability to pay for said Guardian Ad Litem, the court being fully advised, NOW

THEREFORE IT IS ORDERED that _____, a person found or known by the court to be a suitable disinterested person having the requisite knowledge, training, or expertise is hereby appointed Guardian Ad Litem for _____, at public expense to be reimbursed at a reasonable rate not to exceed \$45 per hour or \$300 without further, prior court approval.

DATED: _____

JUDGE/COURT COMMISSIONER

PRESENTED

BY: _____

1 The two cases: Ehrlich v. Alskog and Butler v. Barnett do
2 not have common questions of fact and law. A brief recitation of the
3 nature of the claims is set forth below.

4 In Ehrlich, three plaintiffs remain. The case of Reynolds v.
5 Hartley has been dismissed. In each of the remaining claims,
6 plaintiffs allege improper behavior with a member of the congregation.
7 No claims are made that plaintiffs were coerced into any improper
8 relationship with Pastor Donald Barnett. Plaintiff Michael Ehrlich was
9 a ministerial elder of the church in a position of oversight and a
10 long-time employee of the church. He claims his wife entered into a
11 romantic relationship with Ralph Alskog.

12 The Lemkes claim Sybil Lemke was assaulted while she was
13 sitting in a car passionately kissing with Robert Howerton. Howerton
14 is neither an employee nor an agent of the church.

15 Dee Chabot claims her husband left her. She also claims she
16 has had trouble with her children. In none of these cases is a claim
17 made that Barnett engaged in any type of improper activity with any of
18 the plaintiffs.

19 The case of Butler v. Barnett, et al is completely
20 different. Each plaintiff, Kathy Butler, Sandy Brown, and Chris Hall,
21 alleges she engaged in sexual relations with Pastor Donald Barnett. No
22 other agent of the church is allegedly involved. Furthermore, it
23 appears that many of the activities alleged in the Butler case
24 preceded the "new move of God" which seems to form the basis of
25 plaintiffs' claim that the "new move of God" was used as a means for

1 coercing the plaintiffs into sexual relations.

2 Consolidation of cases is a matter within the discretion of
3 the trial court. Consolidation should not be ordered if prejudice to
4 the rights of the parties will result. Orland, Washington Practice,
5 §55(11). Substantial prejudice to the defendants in Ehrlich will be
6 caused if the litigation of plaintiffs' direct claims in Butler are
7 tried together. The claims in Butler arose out of separate
8 transactions than the claims arising in Ehrlich. Where the claims
9 arose out of separate transactions, separate trials are appropriate.
10 Maki v. Aluminum Building Products, 73 Wn.2d 23, 436 P.2d 186 (1967).

11 The defendants join the Motion for Consolidation for
12 purposes of discovery. If this case is pre-assigned, it would seem
13 appropriate that the trial judge should determine the merits of
14 consolidation for trial purposes.

15 III.

16 MOTION FOR PRE-ASSIGNMENT

17 The defendants join the request that this matter be referred
18 to a single judge under Civil Track I.

19 These cases involve multiple parties with a complex set of
20 facts. The law is somewhat unusual. There are significant First
21 Amendment issues which will be litigated.

22 The plaintiffs have resisted pre-trial discovery. The
23 defendants have filed motions to compel discovery in both cases. In
24 Butler, terms of \$250.00 were imposed on plaintiffs for failure to
25 make discovery. Additionally, two claims have been dismissed.

1 The parties may suffer some disadvantage if they are
2 required to educate a different judge as to the basic nature of the
3 allegations and facts in bringing a motion before the court.

4 IV.

5 TRIAL DATE

6 Plaintiffs' Motion for Early Trial Date is not warranted.
7 Plaintiffs' injuries are not severe and there is no risk that the
8 plaintiffs will die before their trial is heard.

9 Furthermore, counsel's assertion of a right to early trial
10 date is a disingenuous attempt to conceal counsel's lack of diligence.
11 The Ehrlich Complaint was filed on July 31, 1986; however, plaintiffs'
12 Note of Issue for Trial was not filed until July 8, 1987. Similarly,
13 in the Butler case, the Complaint was filed on July 31, 1986; however,
14 the Note of Issue for Trial was not filed until August 18, 1987. If
15 counsel was genuinely interested in an early trial date, then counsel
16 would have taken the necessary steps to obtain a trial date almost one
17 year ago.

18 DATED this 16 day of November 1987.

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

21 By Michael J. Bond
22 MICHAEL J. BOND
23 of Attorneys for Defendants
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FILED

07 NOV 16 P 1 29

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

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SANDY EHRLICH et al.,
Plaintiffs,
v.
RALPH ALSKOG et al.,
Defendants.

SUPERIOR COURT
SEATTLE, WA 98104
NOV 86-2-18429-5
PLAINTIFFS' OBJECTION TO
DEFENDANTS' ATTORNEYS
NOTICE OF INTENT TO
WITHDRAW

TO: CLERK OF THE COURT

AND TO: MICHAEL BOND, Attorney of Law, of Lee, Smart et al.,

AND TO: MICHAEL W. BUGNI, Attorney at Law, of Moren,
Lageschulte and Cornell, P.S.

PLEASE TAKE NOTICE that the Plaintiffs, by and through
their attorneys of record, Richard H. Adler, of Adler, Giersch
and Read, P.S., and John Messina, of Messina Duffy, hereby
formally object to the intended withdrawal of Michael Bugni, of
Moren, Lageschulte and Cornell, P.S., from the representation of
all named Defendants; and the intended withdrawal of Michael
Bond, of Lee, Smart et al., from the representation of all
Defendants except Defendant - Community Chapel and Bible
Training Center.

Said objection is based upon issues of outstanding
discovery, previously noted motions for Preassignment and Early
Trial Dates, as well as a Motion for Consolidation with Cause
Number: 86-2-18429-5. Additionally, Defendants' counsel have
not provided the court with "good cause" as defined by the Rules

PLAINTIFFS' OBJECTION TO DEFENDANTS'
ATTORNEYS NOTICE OF INTENT TO WITHDRAW
Page 1
(ehrlsall/d:1/jao)

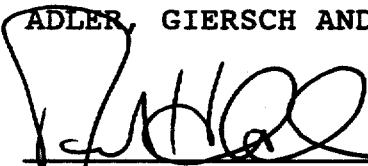
LAW OFFICES OF
ADLER, GIERSCH AND READ, P.S.
1621 SMITH TOWER
SEATTLE, WA 98104
(206) 682-4267
58
PB

1 of Professional Conduct 1.15, as to the grounds necessitating
2 their withdrawal at this late date.

3 Pursuant to CR 71, this objection shall stay
4 withdrawals of Defense counsel until obtained by court order.

5 DATED this 16th day of November, 1987.

6
7 Respectfully submitted,
8 ADLER, GIERSCH AND READ, P.S.

9
10 

11 Richard H. Adler
12 Attorney for Plaintiffs

CIVIL TRACK 1

JERRY M. LITTLE

NOV 19 1987
BY KOBIN COOK
DEPUTY

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

SANDY EHRLICH and MICHAEL EHRLICH,)
wife and husband; KATHRYN)
REYNOLDS; et al.,)

NO. 86-2-18429-5

Plaintiffs,)

v.)

STIPULATION FOR AND ORDER OF
DISMISSAL OF DEFENDANTS HARTLEY

RALPH ALSKOG and ROSEMARY ALSKOG,)
husband and wife; E. SCOTT)
HARTLEY and JANE DOE HARTLEY;)
et al.,)

Defendants.)

COME NOW plaintiff Kathryn Reynolds and defendants, acting
by and through their undersigned attorneys, and agree to the
dismissal, without prejudice and without costs to any party, of all
claims brought herein by plaintiff Kathryn Reynolds against all
defendants, including E. Scott Hartley, thereby dismissing defendants
E. Scott Hartley and Jane Doe Hartley from the above-captioned action.

DATED this 17 day of November, 1987.

ADLER, GIERSCH & READ

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

By [Signature]
RICHARD H. ADLER
of Attorneys for Plaintiffs

By [Signature]
MICHAEL J. BOND
of Attorneys for Defendants

////////

////////

STIPULATION FOR & ORDER OF
DISMISSAL OF DEFENDANTS HARTLEY - 1

LEE, SMART, COOK, MARTIN & PATTERSON, P.S., INC.
ATTORNEYS AT LAW
800 WASHINGTON BUILDING
1325 FOURTH AVENUE
SEATTLE, WASHINGTON 98101
(206) 624-7990

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ORDER

Upon the foregoing stipulation of the parties, it is hereby

ORDERED that the claims by plaintiff Kathryn Reynolds against all defendants herein are dismissed without prejudice and without costs to any party and defendants E. Scott Hartley and Jane Doe Hartley are, therefore, dismissed from the above-captioned action.

DATED this 17 day of November, 1987.




JUDGE

Presented by:

LEE, SMART, COOK MARTIN & PATTERSON

By Michael J. Bond
MICHAEL J. BOND, of Attorneys
for Defendants

Copy Received, Agreed as to
Form, Notice of Presentation Waived:

ADLER, GIERSCH & READ

By Richard H. Adler
RICHARD H. ADLER, of Attorneys
for Plaintiffs

CIVIL TRACK 1

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

SANDY EHRLICH and MICHAEL EHRLICH, wife and husband; et al.,)	No. 86-2-18429-5
Plaintiffs,)	ORDER ALLOWING WITHDRAWAL OF COUNSEL
vs.)	
RALPH ALSKOG and ROSEMARY ALSKOG, husband and wife; et al.,)	
Defendants.)	

THIS MATTER having come on regularly before the above-entitled Court, the Honorable Robert Winsor presiding, upon defense counsel's request for an order permitting withdrawal, the Court having heard argument, and being otherwise fully advised in the premises, NOW, THEREFORE, IT IS HEREBY

ORDERED, ADJUDGED AND DECREED that Michael W. Bugni of Moren, Lageschulte & Cornell, P.S., may withdraw as counsel of record for the Defendants and that Michael J. Bond of Lee, Smart, et al, may withdraw as counsel of record for Defendants Alskog, et ux., Howerton, et ux., Hartley, et ux., Barnett, et ux., and Jane and John Does 1-4 and First Doe Corporation and First Doe Partnership. *This order is conditioned upon compliance with the court's oral ruling of this date*

ORDER - 1

PAID
EX

ORIGINAL

MOREN, LAGESCHULTE & CORNELL, P.S.
ATTORNEYS AT LAW
ROOSEVELT PINEHURST BUILDING
11320 ROOSEVELT WAY N E
SEATTLE, WASHINGTON 98125
12061 365 5500

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DONE IN OPEN COURT this 17 day of November,
1987.

Garth. Att

JUDGE WINSOR
Little

Presented by:

Michael W. Bugni

MICHAEL W. BUGNI
Attorney for Defendants

Copy Received by:

Richard H. Adler

RICHARD H. ADLER
Attorney for Plaintiffs

ORDER - 2

In the SUPERIOR Court for KING County State of Wash. No. 86 2 18429 5

AFFIDAVIT OF SERVICE OF

SANDY EHRLICH, et vir.,
et al.,

vs.

RALPH ALSKOG, et ux.,
et al.,

FILED
1987 NOV 24 AM 9 55
KING COUNTY
SUPERIOR COURT CLERK
SEATTLE, WA

SUMMONS FOR COMPLAINT FOR
PERSONAL INJURIES AND DAMAGE
COMPLAINT FOR PERSONAL INJUR
AND DAMAGES

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 11/20/87 at 8:30 a M., at 3507 S. 40th, Tacoma, Pierce County, Washington, affiant duly served the above-described documents in the above-entitled matter upon

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

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

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

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 11/23/87 _____ sj

SERVICE ATTEMPTED AT:

Edna G. Baldwin
NOTARY PUBLIC in and for the State of Washington, residing at Tacoma

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

61 98

86-2-18429-5

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

SANDY EHRLICH and MICHAEL EHRLICH,)
wife and husband; LARRY LEMKE,)
parent; LARRY LEMKE, Guardian ad)
Litem on behalf of SYBIL N. LEMKE,)
a minor; KATHRYN REYNOLDS; DEE)
CHABOT, parent; DEE CHABOT,)
Guardian ad Litem on behalf of)
SHAWNA MICHELLE CHABOT, MICHAEL)
GRANT CHABOT, NICHOLAS STERLING)
CHABOT, minors,)

Plaintiffs,

v.

RALPH ALSKOG and ROSEMARY ALSKOG,)
husband and wife; ROBERT HOWERTON)
and JANE DOE HOWERTON, husband)
and wife; E. SCOTT HARTLEY and)
JANE DOE HARTLEY; DONALD LEE)
BARNETT and BARBARA BARNETT,)
husband and wife; COMMUNITY CHAPEL)
AND BIBLE TRAINING CENTER, a)
Washington Corporation; "JOHN)
DOES" 1-4 and "JANE DOES" 1-4,)
husbands and wives; FIRST DOE)
CORPORATION; and FIRST DOE)
PARTNERSHIP,)

Defendants.

NO. 86-2-18429-5

SUMMONS FOR
COMPLAINT FOR PERSONAL
INJURIES AND DAMAGES

TO THE DEFENDANTS ABOVE-NAMED

A lawsuit has been started against you in the above-entitled court by the above-named plaintiff. Plaintiff's claims are stated in the written complaint, a copy of which is served upon you with this summons.

1 SUPERIOR COURT OF WASHINGTON FOR KING COUNTY

2 SANDY EHRLICH and MICHAEL)
3 EHRLICH, wife and husband;)
4 LARRY LEMKE, parent; LARRY)
5 LEMKE, Guardian ad Litem on)
6 behalf of SYBIL N. LEMKE, a)
7 minor; KATHRYN REYNOLDS; DEE)
8 CHABOT, parent; DEE CHABOT,)
9 Guardian ad Litem on behalf of)
SHAWNA MICHELLE CHABOT, MICHAEL)
GRANT CHABOT, NICHOLAS STERLING)
CHABOT, minors,)

10 Plaintiffs,)

11 v.)

12 RALPH ALSKOG and ROSEMARY)
13 ALSKOG, husband and wife;)
14 ROBERT HOWERTON and JANE DOE)
15 HOWERTON, husband and wife;)
16 E. SCOTT HARTLEY and JANE DOE)
17 HARTLEY; DONALD LEE BARNETT)
18 and BARBARA BARNETT, husband)
19 and wife; COMMUNITY CHAPEL AND)
20 BIBLE TRAINING CENTER, a)
21 Washington Corporation; "JOHN)
22 DOES" 1-4 and "JANE DOES" 1-4,)
23 husbands and wives; FIRST DOE)
24 CORPORATION; and FIRST DOE)
25 PARTNERSHIP,)

26 Defendants.)

No. 86-2-18429-5

NOTICE OF APPEARANCE

FILED
DEC 15 1987
Superior Court Clerk
KING COUNTY, WASH

27 TO: Plaintiffs; and
28 TO: Richard H. Adler, and John Messina, your attorneys:

29 PLEASE TAKE NOTICE that the defendants named above, DONALD
30 LEE BARNETT and BARBARA BARNETT, hereby enter their Notice of
31 Appearance in the above-entitled action, by and through their

32 NOTICE OF APPEARANCE
15004707.NOA

Evans, Craven & Lackie, P.S.
LAWYERS

1 attorney of record, RODNEY D. HOLLENBECK, and request that all
2 further pleadings or papers herein, except process, be served on
3 their counsel at the address set out below.

4 DATED December 14, 1987.

5 EVANS CRAVEN & LACKIE, P.S.

6 By: *Rodney D. Hollenbeck*
7 RODNEY D. HOLLENBECK
8 Attorneys for Defendants Barnett

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31 NOTICE OF APPEARANCE
15004707.NOA
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Evans, Craven & Lackie, P.S.
LAWYERS

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

(206) 386-5555

CERTIFICATE

On this 27th 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 27th day of January, 1988 at Tacoma, Washington.

Julie A. M. Jensen

IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON

IN AND FOR THE COUNTY OF KING

SANDY EHRLICH, et vir., et al.,)

Plaintiffs,)

vs.)

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

Defendants.)

NO. 86-2-18429-5

NOTICE OF APPEARANCE ON BEHALF OF DEFENDANT(S)
RALPH ALSKOG AND ROSEMARY ALSKOG, HUSBAND AND WIFE

(Clerk's Action Required)

TO : Plaintiff(s) above named; and

TO : Richard H. Adler, their attorney

PLEASE TAKE NOTICE that defendant(s)

RALPH ALSKOG and ROSEMARY ALSKOG, husband and wife,

appear(s) herein by and through their attorneys, ROSENOW, HALE & JOHNSON, and Jack G. Rosenow, and request(s) that all further pleadings and papers, except original process, be served upon said attorneys.

DATED this 27th day of January, 1988.

ROSENOW, HALE & JOHNSON

BY: [Signature]
JACK G. ROSENOW
Of Attorneys for Defendant(s)
Alskog

Notice of Appearance

ROSENOW, HALE & JOHNSON
LAWYERS
SUITE 301 TACOMA MALL OFFICE BUILDING
TACOMA, WASHINGTON 98409
(206) 473-0725

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 I
Honorable Gary Little

ORIGINAL

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

DATED this 29 day of January, 1988 at 32 AM 9:51
Tacoma, Washington.

John A. McHugh

CIVIL TRACK 1

IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON

IN AND FOR THE COUNTY OF KING

FILED
FEB 02 1988
BY JOHN GANN

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

Plaintiffs,)

vs.)

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

Defendants.)

NO. 86-2-18176-8
86-2-18429-5 ✓

(Consolidated)

SANDY EHRLICH, et vir., et al.,)

Plaintiffs,)

vs.)

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

Defendants.)

AMENDED NOTICE OF
APPEARANCE ON BEHALF
OF DEFENDANTS RALPH
ALSKOG AND ROSEMARY
ALSKOG, HUSBAND AND WIFE

TO : All parties and their respective counsel

PLEASE TAKE NOTICE that defendants RALPH ALSKOG and ROSEMARY ALSKOG, husband and wife, appear herein by and through their attorneys, ROSENOW, HALE & JOHNSON, and JACK G. ROSENOW, and request that all further pleadings and papers, except original

* * * *

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* * * *

Amended Notice of Appearance
on Behalf of Defs. Alskog -1-

ROSENOW, HALE & JOHNSON
LAWYERS
SUITE 301 TACOMA MALL OFFICE BUILDING
TACOMA, WASHINGTON 98409
(206) 473-0725

GA ✓

1 process, be served upon said attorneys.

2 DATED this 29th day of January, 1988.

3 ROSENOW, HALE & JOHNSON

4

5

By: 

6

Jack G. Rosenow
of Attorneys for Defendants
Alskog

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Amended Notice of Appearance
on Behalf of Defs. Alskog -2-

ROSENOW, HALE & JOHNSON
LAWYERS
SUITE 301 TACOMA MALL OFFICE BUILDING
TACOMA, WASHINGTON 98409
(206) 473-0725

NON-TRIAL

SCOMIS code:

PREHRG DISPHRG HEARING
 POSTHRG MINUTE

Department No. 19

Date: Friday, March 25, 1988

Page 1 of 1

JUDGE: Hon. Gary M. Little

BAILIFF: Dean Hamilton

COURT CLERK: Robin L. Cook

REPORTER: Dave Erwin

Consolidated

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

Case Caption

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

Litigants and attorneys

Plaintiffs, Ehrlich and others, represented by Counsel, Richard Adler and
Margaret Ennis.

Defendant Barnett represented by Counsel, Tim Donaldson.

Defendant Alskog, represented by Counsel, Jack G. Rosenow.

Defendant, Community Chapel and Bible Training Center represented by Counsel,
Michael Bond.

Minute Entry

Defendant, Alskog's motion to sever trial.

Ruling Reserved.

Plaintiff's motion to amend to join additional
parties.

Granted. Order signed.

Plaintiff's motion to appoint mother as G.A.L.

Granted. Order signed.

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SANDY EHRLICH, et vir., et al.,

AFFIDAVIT OF SERVICE OF

vs.

Plaintiff

RALPH ALSKOG, et ux., et al., 1988

Defendant

SUMMONS FOR COMPLAINT FOR PERSONAL INJURIES & DAMAGES; COMPLAINT FOR PERSONAL INJURY AND DAMAGES

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 11/20/88 at 8:30 A M., at 3507 S 40th, Tacoma, Pierce

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

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

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

entitled matter upon Robert Howerton

by then and there, at the residence and usual place of abode of said person(s), personally delivering a true and

correct copy(ies) thereof to and leaving the same with _____

Patricia Howerton, resident

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 4/1/88
SALLY A. BRYAN

B. Doniego AAL

SERVICE ATTEMPTED AT:

STATE OF WASHINGTON
NOTARY --- PUBLIC
My Commission Expires 4/1/89

Sally A. Bryan
NOTARY PUBLIC in and for the State
of Washington, residing at Tacoma

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

66 [Handwritten signature]

RESIDENCE SERVICE

I hereby declare under penalty of perjury, that on Dec 15, 1988 I signed and filed this declaration and the documents attached. *and parties*

Don M. Gulliford

FILED
83 DEC 19 AM 9 44
KING COUNTY CIVIL TRACK ONE
SUPERIOR COURT
THE HONORABLE JOHN RILEY
CLERK
BELLEVUE WA.

IN THE SUPERIOR COURT OF WASHINGTON FOR KING COUNTY

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

Plaintiffs,)

v.)

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

Defendants and
Third Party Plaintiffs,)

v.)

GARY LIEN,)

Third Party Defendant.)

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

DECLARATION OF DON M. GULLIFORD ON BEHALF OF CONSOLIDATED PLAINTIFF ST. PAUL FIRE & MARINE INSURANCE COMPANY IN OPPOSITION TO PLAINTIFF LEMKE'S MOTION TO TERMINATE DEPOSITION OF SYBIL LEMKE

SANDY EHRLICH, et vir, et al.,)

Plaintiffs,)

v.)

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

Defendants.)

NO. 86-2-18429-5 ✓

MAUREEN P. JORGENSEN,)

Plaintiff,)

v.)

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

Defendants.)

NO. 86-2-26860-8

DECLARATION OF DON M. GULLIFORD
IN OPPOSITION TO LEMKE'S MOTION TO
TERMINATE DEPOSITION OF SYBIL LEMKE - 1
gulliford.dec

LAW OFFICES OF
DON M. GULLIFORD & ASSOCIATES
2200 112th Avenue N.E.
P.O. Box 548, Bellevue, WA 98009-0548
Bellevue, WA 98004
(206) 462-4000

67

1
2 ST. PAUL FIRE AND MARINE INSURANCE)
COMPANY, a foreign corporation,)

3 Plaintiff,)

4 v.)

5 KATHY LEE BUTLER, et vir, et al.,)

6 Defendants.)
7

NO. 88-2-18321-0

8 I, Don M. Gulliford, am one of the attorneys representing
9 St. Paul Fire & Marine Insurance Company in this consolidated
10 litigation and make this declaration based upon my direct
11 personal knowledge. The purpose of this declaration is to oppose
12 plaintiffs Lemke's Motion to Terminate Deposition of Sybil Lemke.

13 We adopt and support the contents of Attorney Michael J.
14 Bond's declaration in opposition to the termination motion for
15 the deposition of Sybil Lemke.

16 We further advocate and urge to the Court the following
17 obvious reasons:

18 As the court files reflect, multiple litigations have now
19 been consolidated for the efficiency of discovery and proceedings
20 herein, and it is manifestly obvious to all counsel and the court
21 which are involved in this litigation that duplicative
22 depositions and other procedures would be extremely wasteful and
23 unproductive in this consolidated litigation.
24

DECLARATION OF DON M. GULLIFORD
IN OPPOSITION TO LEMKE'S MOTION TO
TERMINATE DEPOSITION OF SYBIL LEMKE - 2
gulliford.dec

LAW OFFICES OF
DON M. GULLIFORD & ASSOCIATES
2200 112th Avenue N.E.
P.O. Box 548, Bellevue, WA 98009-0548
Bellevue, WA 98004
(206) 462-4000

1 It has only been recently that the litigations have been
2 consolidated, and the St. Paul Fire and Marine Insurance Company
3 has had no opportunity whatsoever to depose plaintiff Sybil
4 Lemke.

5 I further represent to the Court that I have been advised by
6 Pauline Smetka, counsel herein for the defendants Alskog, as well
7 as counsel for the additional party defendant Farmers Insurance
8 Company of Washington, that the Farmers Insurance Company of
9 Washington is filing a declaratory action relevant to these
10 matters.

11 It is clearly apparent from the other pleadings recently
12 filed in opposition to terminating the deposition of Sybil Lemke
13 that testimony by plaintiff Sybil Lemke would be directly
14 relevant to issues of intent, whether or not an accident or
15 occurrence took place within the definition of various insurance
16 policies, and whether or not the events involving Ms. Lemke's
17 relationships with the defendant CCBTC came within the parameters
18 of the St. Paul Fire and Marine Insurance Company's exclusionary
19 clauses regarding counseling or other ministerial activities by a
20 church, to say the very least.

21 In view of these factors, the plaintiff's motion to terminate
22 Ms. Lemke's deposition should be denied, and the plaintiff Lemke
23 and her counsel ordered to submit to a full and complete
24

DECLARATION OF DON M. GULLIFORD
IN OPPOSITION TO LEMKE'S MOTION TO
TERMINATE DEPOSITION OF SYBIL LEMKE - 3
gulliford.dec

LAW OFFICES OF
DON M. GULLIFORD & ASSOCIATES
2200 112th Avenue N.E.
P.O. Box 548, Bellevue, WA 98009-0548
Bellevue, WA 98004
(206) 462-4000

1 discovery process under the vigorous continuing control and
2 supervision of the Court.

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

5 DATED at Bellevue, Washington, this 15th day of December,
6 1988.

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8 LAW OFFICES OF
DON M. GULLIFORD & ASSOCIATES

9
10 By 

DON M. GULLIFORD
Of Attorneys for St. Paul
Fire and Marine Insurance
Company

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DECLARATION OF DON M. GULLIFORD
IN OPPOSITION TO LEMKE'S MOTION TO
TERMINATE DEPOSITION OF SYBIL LEMKE - 4
gulliford.dec

LAW OFFICES OF
DON M. GULLIFORD & ASSOCIATES
2200 112th Avenue N.E.
P.O. Box 548, Bellevue, WA 98009-0548
Bellevue, WA 98004
(206) 462-4000

NON-TRIAL

SCOMIS code:

PREHRG DISPHRG HEARING
 POSTHRG MINUTE STTLCNF

Department No. 25

Date: January 6, 1989

Page 1 of 2

88-2-18321-0

88-2-04615-8

86-2-26360-8

86-2-18429-5 ✓

King County Cause No. 86-2-18176-8 consolidated

87-2-14919-6

JUDGE: John W. Riley

BAILIFF: Beth Custer

COURT CLERK: Melissa Keating

REPORTER: Victoria Raccagno

Case Caption

Kathy Lee Butler et al vs. Donald Barnett et al

Litigants and attorneys

Michael Bond for Defendant CCBTC, Bruce Winchell for Plaintiff American Casualty, Jeff Campiche for Plaintiff Butler, Susan Jones for Plaintiff Jorgenson, Ann Durham for Plaintiff Ehrlich, John Graffe for Defendant Alskog, John Glassman for Defendant CCBTC, Tim Donaldson for Defendant Barnett, and Don Bulliford for Plaintiff St. Paul Fire and Marine

Minute Entry

Plaintiff American Casualty Company motion for partial summary judgment.

Respective Counsel make oral argument.

The Court denies the motion without prejudice.

Respective Counsel discuss scheduling problems. The Court orders that if Respective Counsel are unable to agree, this matter shall be resolved on January 13, 1989 at 3:30 p.m.

sub #

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CIVIL TRACK I
THE HONORABLE JOHN RILEY

In the Superior Court of the State of Washington,

In and For the County of King

Sandy Ehrlich, et al.,

Plaintiff

v.

Ralph Alskog, et ux.,

Defendant

CONSOLIDATED TRACK ONE
CAUSE NO. 86-2-18176-8
No. 86-2-18429-5

**NOTICE OF ORAL EXAMINATION
BEFORE TRIAL**

To: All Parties

and to: Thier Respective Counsel

YOU, AND EACH OF YOU, WILL PLEASE TAKE NOTICE that the testimony of Rosemary Alskog, the Witness above named will be taken on Oral Examination Before Trial at the instance and request of the Plaintiff in the above entitled and numbered action, before Jan Serra Notary Public, or some other Notary Public at 1620 Key Tower, 1000 Second Avenue Seattle, Washington, on Thursday, the 2nd day of February, 19 89, commencing at the hour of 10:30 o'clock, A M., on that day; the said Oral Examination of said witness at said time and place to be subject to continuance or adjournment from time to time or place to place until completed.

This testimony upon oral examination will be taken on the ground and for the reason the said person is a party to or a witness in the above entitled action, and will give evidence material to the establishment of the Plaintiff's case.

DATED this 13th day of January, 1989.



Attorneys for Plaintiff

Office and Post Office Address:

Seattle, Washington.

Adler Giersch, P.S.
1621 Smith Tower
506 Second Avenue
Seattle, WA. 98104

JAN W. SERRA & ASSOCIATES, COURT REPORTERS

316 Occidental Ave. S. Suite 316

Seattle, Wa. 98104

(206) 622-6013

69
d

In the Superior Court of the State of Washington,

In and For the County of KING

Sandy Ehrlich, et al.,

Plaintiff

v.

Ralph Alskog, et ux.,

Defendant

CONSOLIDATED TRACK ONE

CAUSE NO. 86-2-18176-8

No. 86-2-18429-5

AMENDED

NOTICE OF ORAL EXAMINATION

BEFORE TRIAL

To: ALL PARTIES

and to: Their Respective Counsel

YOU, AND EACH OF YOU, WILL PLEASE TAKE NOTICE that the testimony of Rosemary Alskog, the Defendant above named will be taken on Oral Examination Before Trial at the instance and request of the Plaintiff in the above entitled and numbered action, before Jan Serra Notary Public, or some other Notary Public at 1620 Key Tower, 1000 Second Avenue Seattle, Washington, on Tuesday, the 28th day of February, 1989, commencing at the hour of 9:30 o'clock, A. M., on that day; the said Oral Examination of said witness at said time and place to be subject to continuance or adjournment from time to time or place to place until completed.

This testimony upon oral examination will be taken on the ground and for the reason the said person is a party to or a witness in the above entitled action, and will give evidence material to the establishment of the Plaintiff's case.

DATED this 25th day of January, 1989.

[Handwritten signature]

Office and Post Office Address:

Attorneys for Plaintiff

Seattle, Washington.

Adler Giersch, P.S. 1621 Smith Tower 506 Second Avenue Seattle, WA. 98104

[Handwritten initials]

JAN W. SERRA & ASSOCIATES, COURT REPORTERS

PERSONS RECEIVING NOTICE

Michael Bond, Esquire
Lee, Smart, et al.,
800 Washington Building
Seattle, WA 98104
Attorney for Defendant CCBTC

Michael Bugni, Esquire
Moren, Cornell, Hansen, P.S.
11320 Roosevelt Way N.E.
Seattle, WA 98125
Attorney for Defendant Howerton

John C. Graffe, Esquire
Rosenow, Hale & Johnson
1620 Key Tower
Seattle, WA 98104
Attorney for Defendants Alskog

Don M. Gulliford, Esquire
Law Offices of Don M. Gulliford
2200 112th Avenue N.E.
Bellevue, WA 98004
Attorney for St. Paul Fire & Marine
Insurance

Jim Craven, Esquire
Evans, Craven & Lackie, P.S.
Columbia Center 31st Floor
Seattle, WA 98104
Attorney for Defendants Barnett

Susan Jones, Esquire
Preston Thorgrimson
54th Floor
Columbia Center
Seattle, WA 98104
Attorney for Plaintiff Jorgenson

Jim Messina, Esquire
Molly McCarty, Legal Assistant
8002 Tacoma Mall Boulevard
200 Benjamin Franklin Building
Tacoma, WA 98409
Attorney for Plaintiffs Ehrlich,
et al.

Jack Rosenow, Esquire
Rosenow, Hale & Johnson
205 Tacoma Mall Office Building
Tacoma, WA 98409
Attorney for Defendants Alskog

Pauline Smetka, Esquire
Hellsell, Fetterman, Todd
1500 Washington Building
Seattle, WA 98101
Attorney for Defendants Alskog

Bruce Winchell, Esquire
Lane, Powell, Moss & Miller
3800 Rainier Tower
Seattle, WA 98104-2647
Attorney for American Casualty

John S. Glassman, Esquire
420 Old City Hall
625 Commerce Street
Tacoma, WA 98402
Attorney for Defendant CCBTC

Jeff Campiche, Esquire
Kargianis, Austin, Erickson
47th Floor
Columbia Center
Seattle, WA 98104
Attorney for Defendants Butler

Donald Hall
P. O. Box 168
Big Fork, MT 59911
Pro se - Plaintiff (by mail)

Carl A. Peterson
710 Cedar Street
Muscatine, IA 52761
Pro se - Plaintiff (by mail)

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

FILED
1989 JAN 27 AM 8:57

No. 85-2-18429-5
SUPERIOR COURT TRACK ONE
CASE NO. 86-2-18176-8
NOTE FOR MOTION CALENDAR

SANDY EHRLICH, et al.,

Plaintiffs,

v.

RALPH ALSKOG, et al.,

Defendants.

(Clerk's Action Required)

TO: THE CLERK OF THE COURT AND TO ALL PARTIES LISTED 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: February 6, 1989 Day of Week: Monday

Nature of Motion: Motion in Opposition to Michael Bond's Request to Withdraw as Counsel

DESIGNATED CALENDAR

- | | |
|---|--|
| <input type="checkbox"/> Civil Motion (LR 0.7)(9:30) | <input type="checkbox"/> FAMILY LAW MOTION [LR 0.5(b) LR 94.041 (W291) |
| <input type="checkbox"/> Summary Judgment (LR 56)(9:30) | <input type="checkbox"/> Domestic Motion (9:30) |
| <input type="checkbox"/> Supplemental Proceeding (LR 69)(1:30) | <input type="checkbox"/> Sealed File Motion (1:30) |
| <input type="checkbox"/> Presiding Judge (Trial Date Motions Only)
(11:15 or 1:30 Daily) | <input type="checkbox"/> Support Motion (1:30) |
| Time of Hearing: _____ | <input type="checkbox"/> Modification (1:30) |

EX PARTE MOTION [LR 0.0(b)] (W623)
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: The Honorable John Riley

Time of Hearing: 4:00 p.m. Room: E854

Typed Name Ann J. Durham

OF ADLER GIERSCH, P.S.
ATTORNEY FOR PLAINTIFF Ehrlich, et al.
Telephone: (206)682-0300

DATED: January 26, 1989

LIST NAMES, ADDRESSES AND TELEPHONE NUMBERS OF ALL PARTIES REQUIRING NOTICE ATTACHED.

NOTE FOR MOTION CALENDAR

LAW OFFICES OF
ADLER GIERSCH, P.S.
SUITE 600
401 SECOND AVE. S.
SEATTLE, WA 98104
(206) 682-0300

71
ed

PERSONS RECEIVING NOTICE

Michael Bond, Esquire
Lee, Smart, et al.,
800 Washington Building
Seattle, WA 98104
Attorney for Defendant CCBTC

Michael Bugni, Esquire
Moren, Cornell, Hansen, P.S.
11320 Roosevelt Way N.E.
Seattle, WA 98125
Attorney for Defendant Howerton

John C. Graffe, Esquire
Rosenow, Hale & Johnson
1620 Key Tower
Seattle, WA 98104
Attorney for Defendants Alskog

Don M. Gulliford, Esquire
Law Offices of Don M. Gulliford
2200 112th Avenue N.E.
Bellevue, WA 98004
Attorney for St. Paul Fire & Marine
Insurance

Jim Craven, Esquire
Evans, Craven & Lackie, P.S.
Columbia Center 31st Floor
Seattle, WA 98104
Attorney for Defendants Barnett

Susan Jones, Esquire
Preston Thorgrimson
54th Floor
Columbia Center
Seattle, WA 98104
Attorney for Plaintiff Jorgenson

Jim Messina, Esquire
Molly McCarty, Legal Assistant
8002 Tacoma Mall Boulevard
200 Benjamin Franklin Building
Tacoma, WA 98409
Attorney for Plaintiffs Ehrlich,
et al.

Jack Rosenow, Esquire
Rosenow, Hale & Johnson
205 Tacoma Mall Office Building
Tacoma, WA 98409
Attorney for Defendants Alskog

Pauline Smetka, Esquire
Hellsell, Fetterman, Todd
1500 Washington Building
Seattle, WA 98101
Attorney for Defendants Alskog

Bruce Winchell, Esquire
Lane, Powell, Moss & Miller
3800 Rainier Tower
Seattle, WA 98104-2647
Attorney for American Casualty

John S. Glassman, Esquire
420 Old City Hall
625 Commerce Street
Tacoma, WA 98402
Attorney for Defendant CCBTC

Jeff Campiche, Esquire
Kargianis, Austin, Erickson
47th Floor
Columbia Center
Seattle, WA 98104
Attorney for Defendants Butler

Donald Hall
P. O. Box 168
Big Fork, MT 59911
Pro se - Plaintiff (by mail)

Carl A. Peterson
710 Cedar Street
Muscatine, IA 52761
Pro se - Plaintiff (by mail)

SCOMIS code:

PREHRG DISPHRG HEARING
 POSTHRG MINUTE STTLCNF

Department No. 25
Date: February 6, 1989
Page 1 of 1

JUDGE: John W. Riley
BAILIFF: Beth Custer
COURT CLERK: Melissa Keating
REPORTER: Raelene Semago

King County Cause No. 86-2-26360-8
88-2-18321-0
88-2-04615-8
86-2-18429-5
86-2-18176-8 consolidated
87-2-14919-6

Case Caption

Kathy Lee Butler etal vs. Donald Barnett etal

Litigants and attorneys

Bruce Winchell appearing for Plaintiff American Casualty, Don Gulliford appearing for St. Paul Fire and Marine, Susan Jones appearing for Plaintiff Jorgenson, Ann Durham appearing for Plaintiff Ehrlich, J. Ronald Sim and Robert Roban for Defe CCBTC, Craig McIvor and Jack Rosenow for Defendant Alskog

Minute Entry

Plaintiff Ehrlich motion in opposition to withdraw as legal counsel.
Respective Counsel and the Court discuss scheduling.
Respective Counsel make oral arguments.
Defendant CCBTC motion to extend discover cut off date. The Court reserves ruling.
Plaintiff Ehrlich motion in opposition to withdraw as legal Counsel. The Court reserves ruling.
No Order Signed. X X X

sub #
72
DH

SUB # 73 OF

FILE # 86-2-18429-5

SEALED TO

PUBLIC ACCESS.

FILED

KING COUNTY WASHINGTON

APR 7 1989

SUPERIOR COURT CLERK
MELISSA R. KEATING
DEPUTY

CIVIL TRACK ONE
THE HONORABLE JOHN W. RILEY

SUPERIOR COURT OF WASHINGTON FOR KING COUNTY

1	SANDY EHRLICH, et. ux.,)	
2	et. al.,)	
3)	
4	Plaintiffs,)	
5	v.)	CONSOLIDATED/TRACK ONE
6)	NO. 86-2-18429-5
7	RALPH ALSKOG, et. ux.,)	
8	et. al.,)	STIPULATION AND ORDER
9)	REGARDING CONFIDENTIALITY
10	Defendants,)	OF SETTLEMENT
11)	(TO BE FILED UNDER SEAL)

Pursuant to Paragraphs 15 through 20 of the Ehrlich Full Release and Settlement Agreement, Paragraphs 16 through 21 of the Lemke, Chabot and Kitchell Full Releases and Settlement Agreements entered into between all defendants and all plaintiffs, and pursuant to the agreements of defendants and plaintiffs, the parties to this action hereby stipulate, agree, and request that the Court enter the following order:

Defendants, plaintiffs, their respective attorneys and each of their agents and employees, or persons acting for them, are prohibited from disclosing the substance of the settlement negotiations with defendants, or its value or comparative value to other settlements, judgments, or any other thing of value. Defendants, Donald Barnett, et al., however, can make such disclosures to their attorneys-of-record or to any other person or entity such as their accountants, auditors, insurers or any other similar entity or individual to whom such disclosure is required in the ordinary course of their business. Plaintiffs and their attorneys, and each of their agents and employees, may

STIPULATION AND ORDER REGARDING
CONFIDENTIALITY OF SETTLEMENT
1500\4789\82 - Page: 1

Evans, Craven & Lachic, P.S.
LAWYERS

CIVIL TRACK 1

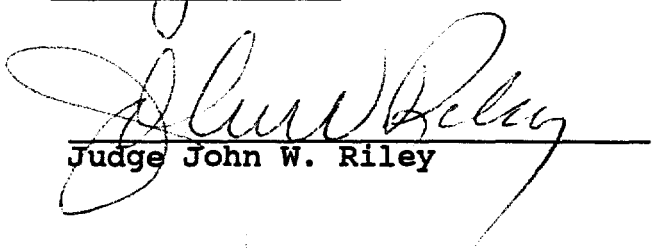
1 not make any statements, either directly or indirectly, by
2 implication or innuendo, to anyone, including the press or media,
3 concerning the amount of settlement or the substance of
4 settlement negotiations, or describing the settlement.

5 Any inquiry of plaintiffs or their attorneys, or each of
6 their agents and employees, into the settlement, its amount,
7 meaning or comparative value, or the negotiations leading to the
8 settlement by anyone, including the press or media, will be met
9 only by a statement that the matter was disposed of prior to
10 trial by agreement, the terms of which are confidential.

11 Plaintiffs and their attorneys, and each of their agents and
12 employees, agree that a violation of the court order prohibiting
13 any unauthorized disclosure of the nature and substance of the
14 settlement negotiations, the meaning of the settlement, its
15 importance, value or comparative value to other settlements or
16 judgments will subject the offending person to further review by
17 the court.

18 Any and all documents and records containing the terms and
19 conditions of settlement are to be sealed. Such seal may be
20 broken only by lawful order of the court or by the written
21 consent of all parties contributing to said settlement.

22 DATED this 17th day of April, 1989.

23
24
25 
26 Judge John W. Riley
27
28
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30

31 STIPULATION AND ORDER REGARDING
32 CONFIDENTIALITY OF SETTLEMENT
1500\4789\82 - Page: 2

Evans, Cravens, Lachin, P. J.

LAWYERS

(301) 386-5565

1
2 MESSINA & DUFFY

3
4
5 By: John Messina by Adler, Giersch & Read
6 JOHN MESSINA
7 Attorneys for Plaintiffs
8 Ehrlich, Lemke, Chabot
and Kitchell

9 HELSELL, FETTERMAN, MARTIN,
10 TODD & HOKANSON

11 By: Pauline V Smetka
12 PAULINE SMETKA
13 Attorneys for Defendants
14 Alskog

15
16 PETERSON, LYCETTE & SNOOK

17
18 BY Rodney D. Hollenbach
19 approved by原告
20 KEITH A. BOLTON
Attorneys for Defendants
Howerton

EVANS, CRAVEN & LACKIE, P.S.

By: Rodney D. Hollenbach for
CONSTANCE D. GOULD
Attorneys for Defendants
Donald Barnett, et al.

ADLER, GIERSCH & READ

By: Ann Durkan
Attorneys for Plaintiffs
Ehrlich, Lemke, Chabot and
Kitchell

ROSENOW, HALE & JOHNSON

BY Pauline V Smetka for
Rosenow, Hale & Johnson per telephone
Attorneys for Defendants permission
Alskog 3/31/89

SCHWEPPE, KRUG & TAUSSEND

BY Robert Rohan
ROBERT ROHAN
Attorneys for Defendant
Community Chapel and Bible
Training Center

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31 STIPULATION AND ORDER REGARDING
32 CONFIDENTIALITY OF SETTLEMENT
1500\4789\82 - Page: 3

Evans, Craven & Lackie, P.S.

LAWYERS

**CIVIL TRACK ONE
THE HONORABLE JOHN W. RILEY**

SUPERIOR COURT OF WASHINGTON FOR KING COUNTY

SANDY EHRLICH and MICHAEL)
EHRLICH, wife and husband;)
LARRY LEMKE, parent; LARRY)
LEMKE, Guardian ad Litem on)
behalf of SYBIL N. LEMKE, a)
minor; DEE CHABOT, parent;)
Guardian ad Litem on behalf)
of SHAWNA MICHELLE CHABOT,)
MICHAEL GRANT CHABOT,)
NICHOLAS STERLING CHABOT,)
minors; CATHERINE KITCHELL)
and RONALD KITCHELL, wife)
and husband; CATHERINE)
KITCHELL, Guardian ad Litem)
on behalf of WENDY KITCHELL)
a minor,)
Plaintiffs,)
vs.)
RALPH ALSKOG and ROSEMARY)
ALSKOG, husband and wife;)
ROBERT HOWERTON and JANE DOE)
HOWERTON, husband and wife;)
DONALD LEE BARNETT and)
BARBARA BARNETT, husband and)
wife; COMMUNITY CHAPEL AND)
BIBLE TRAINING CENTER, a)
Washington Corporation; "JOHN)
DOES" 1-4 AND "JANE DOES" 1-4,)
husbands and wives; FIRST DOE)
CORPORATION; and FIRST DOE)
PARTNERSHIP,)
Defendants.)

CONSOLIDATED/TRACK ONE
NO. 86-2-18176-8
NO. 86-2-18429-5 ✓
STIPULATION FOR AND
FOR DISMISSAL

IT IS HEREBY STIPULATED by and between the plaintiffs and
defendants, above-named, through their respective counsel of
STIP & ORDER OF DISMISSAL 1

CIVIL TRACK I

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Evans, Craven & Lachic, P.A.
LAWYERS
SEATTLE, WASHINGTON
(206) 386-5050

1 record, that the above-entitled action has been fully compromised
2 and that said Complaint may be dismissed with prejudice and
3 without costs as to any and all causes of actions herein.

4 DATED this 7th day of April, 1989.

5
6
7 MESSINA & DUFFY

8
9 By: John Messina & G.D.
10 JOHN MESSINA
11 Attorneys for Plaintiffs
12 Ehrlich, Lemke, Chabot
and Kitchell

13 HELSELL, FETTERMAN, MARTIN,
14 TODD & HOKANSON

15 By: Pauline V. Smetka
16 PAULINE SMETKA
17 Attorneys for Defendants
18 Alskog

19
20 PETERSON, LYCETTE & SNOOK

21
22 BY approved by telephone on Rodney
23 KEITH A. BOLTON D. Hollenbeck
24 Attorneys for Defendants
Howerton

EVANS, CRAVEN & LACKIE, P.S.

8
9 By: Rodney D. Hollenbeck
10 RODNEY D. HOLLENBECK
11 Attorneys for Defendants
12 Donald Barnett, et al.

ADLER, GIERSCH & READ

15 By: Amey J. Werhan
16 Attorneys for Plaintiffs
17 Ehrlich, Lemke, Chabot and
18 Kitchell

ROSENOW, HALE & JOHNSON

21
22 BY Pauline V. Smetka for
23 Rosenow, Hale & Johnson per telephone
24 Attorneys for Defendants permission
Alskog 3/31/89

SCHWEPPE, KRUG & TAUSSEND

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26
27 BY Robert Rohan
28 ROBERT ROHAN
29 Attorneys for Defendant
30 Community Chapel and Bible
Training Center

31 STIP & ORDER OF DISMISSAL 2
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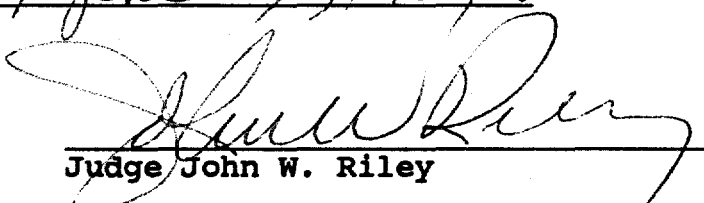
Evans, Craven & Lackie, P.S.
LAWYERS

1
2 **ORDER OF DISMISSAL**

3 PURSUANT to the foregoing Stipulation, it is hereby
4 ORDERED, that the above-entitled action be, and the same is
5 hereby dismissed with prejudice and without costs as to any and
6 all causes of action herein.

7 DONE IN OPEN COURT

April 7, 1959.

8
9
10 
11 Judge John W. Riley

12 PRESENTED BY:
13 EVANS CRAVEN & LACKIE, P.S.

14 BY Rodney D. Hollenbeck
15 RODNEY D. HOLLENBECK
16 Attorneys for Defendants
17 Barnett

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31 STIP & ORDER OF DISMISSAL 3
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Evans, Craven & Lackie, P.S.
LAWYERS

SWIRE HOUSE COLUMBIA CENTER, 401 5th Avenue
SEATTLE, WASHINGTON 98104

(206) 386-5555

ORIGINAL

FILED

CIVIL TRACK I

THE HONORABLE JOHN RILEY

1989 MAY 22 PM 12:35

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

KING COUNTY
SUPERIOR COURT CLERK
SEATTLE, WA

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AMERICAN CASUALTY COMPANY OF)
READING PENNSYLVANIA, a)
Pennsylvania corporation,)

Plaintiff,)

v.)

KATHY LEE BUTLER, et al.,)

Defendants.)

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

Plaintiffs,)

v.)

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

Defendants.)

SANDY EHRLICH, et al.,)

Plaintiffs,)

v.)

RALPH ALSKOG, et al.)

Defendants.)

MAUREEN PANGBORNE JORGENSEN,)

Plaintiff,)

v.)

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

Defendants.)

BLOCK ACCOUNT RECEIPT

No. 88-2-04615-8

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

BLOCK ACCOUNT RECEIPT

No. 86-2-18176-8

No. 86-2-18429-5

No. 86-2-26360-8

LAW OFFICES OF
ADLER GIERSCH, P.S.
SUITE 600
401 SECOND AVE. S.
SEATTLE, WA 98104
(206) 682-0300

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RECEIPT is hereby acknowledged of \$2,455.00 dollars deposited with the undersigned by Ann J. Durham, attorney for Nicholas Chabot a minor; \$2,455.00 was placed in Term Deposit, until February 13, 2002, and the undersigned agrees to hold the same and any subsequent deposits to said account and not allow withdrawal thereof except when Term Deposit comes due, per order of King County Superior Court.

DATED this 9th day of May, 1989.

Marla McMillan
Marla McMillan
of U.S. Bank

BLOCK ACCOUNT RECEIPT

LAW OFFICES OF
ADLER GIER SCH, P.S.
SUITE 600
401 SECOND AVE. S.
SEATTLE, WA 98104
(206) 682-0300