

BEFORE THE HEARING EXAMINER
CITY OF SEATTLE

In the Matter of the Appeal of:

DAVID M. MOEHRING,

from a decision issued by the Director,
Department of Construction and Inspections.

Hearing Examiner File:
MUP-18-001

Department Reference: 3028431

3641 22nd Avenue West

APPLICANT'S RESPONSE IN
OPPOSITION TO APPELLANT'S
MOTION TO CONTINUE
HEARING AND ORDER ON
DISCOVERY

COMES NOW the applicant, Loren Landstrom of Sound Equities Incorporated ("Sound Equities"), by and through its undersigned attorney, Brandon S. Gribben of Helsell Fetterman LLP, and submits this response in opposition to appellant David Moehring's ("Moehring") Motion to Continue Hearing and Order on Discovery.

I. INTRODUCTION AND RELIEF REQUESTED

Moehring has filed a motion to continue the hearing based upon SDCI's purported failure to respond to discovery requests, even though SDCI responded to his discovery request within the time frame provided under the Hearing Examiner's Rules of Practice and Procedure ("HER") and the Superior Court Civil Rules ("Civil Rules"). Moehring also seeks to preclude SDCI from introducing any exhibits or witnesses because its witness and

APPLICANT'S RESPONSE IN OPPOSITION TO
APPELLANT'S MOTION FOR REASSIGNMENT
OF THE HEARING EXAMINER - 1

HELSELL
FETTERMAN
Helsell Fetterman LLP
1001 Fourth Avenue, Suite 4200
Seattle, WA 98154-1154
206.292.1144 WWW.HELSELL.COM

1 exhibit list was served 11 minutes late, and filed with the Hearing Examiner's Office early
2 the following day. This would be a severe and unduly harsh remedy that is not warranted
3 under the circumstances. Because SDCI timely responded to Moehring's discovery
4 requests, and Moehring has not alleged, much less demonstrated, that he will suffer any
5 prejudice by SDCI's late filing, his motion should be denied in its entirety.

6 **II. STATEMENT OF FACTS**

7 This matter concerns the appeal of a land use decision approving a short subdivision
8 for the property located at 3641 22nd Avenue West, Seattle, WA. On March 8, 2018,
9 Moehring served SDCI with Appellant's Second Interrogatories and Requests for
10 Documents to Respondent.¹ The discovery requests sought information and documents that
11 were not relevant to this land use appeal, including information concerning the owner of the
12 property, the building permit, geotechnical reports and information concerning the
13 application of the tree protection ordinance, SMC Chapter 25.11. Under the HER and
14 applicable Civil Rules, SDCI's responses and objections to Moehring's discovery was due
15 by April 9, 2018. SDCI timely served its answers and objections to Moehring's discovery
16 requests.²

17 On January 31, 2018, Hearing Examiner Ryan Vancil issued a Prehearing Order that
18 scheduled the deadline for SDCI to file its witness and exhibit list by March 29, 2018 at 5:00
19 p.m. SDCI served its witness and exhibit list on Moehring and Sound Equities on March 29
20 at 5:11 p.m. It was filed early the following day.³

21 **III. STATEMENT OF ISSUES**

22 1. Should the motion to continue the hearing and order on discovery be denied
23 where SDCI timely responded and objected to Moehring's discovery requests? Yes.

24 ¹ A copy of Moehring's discovery requests is attached as Exhibit A.

25 ² A copy of SDCI's answers and objections to the discovery requests is attached as Exhibit B.

³ A copy of SDCI's email serving its witness and exhibit list (without attachments) is attached as Exhibit C.

1 2. Should the motion to preclude SDCI from introducing any witnesses or
2 exhibits be denied where SDCI filed its witness and exhibit list 11 minutes late, and where
3 Moehring has not alleged, much less demonstrated, that he will suffer any prejudice? Yes.

4 **IV. EVIDENCE RELIED UPON**

5 This motion is based upon the Decision, the Appeal, the file in this matter and the
6 exhibits attached hereto.

7 **V. AUTHORITY**

8 Under the HER and Civil Rules, responses and answers to discovery requests are due
9 within 30 days of service (unless the thirtieth day falls on a weekend or holiday). SDCI
10 responded to Moehring's discovery requests within the time frame required by applicable
11 law. Moehring prematurely filed his motion before SDCI's deadline to respond. Thus, there
12 is no basis for Moehring's motion to continue the hearing so that SDCI can provide
13 discovery responses.

14 Furthermore, each of Moehring's interrogatories and requests for production are
15 seeking information and documents that are wholly unrelated to the appeal, or concern
16 issues raised in the Appeal that have since been dismissed. For example, Moehring seeks
17 documents and information related to the ownership of the property, the building permit,
18 geotechnical evaluations, and tree protection measures that are not part of the short plat
19 approval process. None of these topics are relevant to the Appeal. And for this reason, the
20 motion should also be denied.

21 Moehring also moves to continue the hearing or, alternatively, preclude SDCI from
22 introducing any witnesses or exhibits because it filed its witness and exhibit list a few hours
23 late. Moehring argues that because his motion to issue a subpoena was denied, that SDCI
24 should be precluded from introducing any evidence. This is a false equivalency. Moehring
25 violated numerous procedural rules related to the issuance of subpoenas that would have

1 resulted in substantial prejudice to SDCI and Sound Equities had the motions been granted.
2 Conversely, SDCI's de minimus late service and filing will not prejudice Moehring in
3 anyway.

4 Under HER 3.12, a "motion may be made for a subpoena to require a person to
5 appear and testify." Under HER 2.16(a), "every motion...shall be served on each party
6 representative on the day it is filed with the Hearing Examiner." Under HER 2.16(b), a
7 party has at least 7 days to submit a response to a motion. And under HER 3.12(d),
8 "subpoenas shall be served no later than 7 days prior to the date the appearance or
9 production is ordered." Moehring failed to comply with each of these rules.

10 First, Moehring failed to serve all four motions to subpoena on Sound Equities'
11 counsel in violation of HER 2.16(a). Second, Moehring filed (but did not serve) the motion
12 only 7 days before the land use hearing was scheduled, meaning that any responses to the
13 motion would be due the day of the hearing, thus depriving Sound Equities of an
14 opportunity to respond. Assuming the Hearing Examiner approved the motion that same
15 day, it would not be possible for Moehring to serve the subpoenas at least 7 days prior to the
16 hearing date, which is required under HER 3.12(d). Thus, Moehring's motions were not
17 denied by the Hearing Examiner because they were served a few hours late – they were
18 denied because they were served several weeks late. The motions should have been served
19 weeks earlier to allow sufficient time for Sound Equities and SDCI to respond to the motion,
20 for the Hearing Examiner to rule on the motion, and for Moehring to serve the subpoenas
21 (assuming the motion was granted).

22 While SDCI did technically serve its witness and exhibit list a few minutes past the
23 deadline, this was a de minimus violation of the Prehearing Order and Moehring will not
24 suffer any prejudice. Sound Equities identified each of the witnesses and a majority of the
25 exhibits identified by SDCI. Moehring cannot, and does not, allege that he will suffer any

1 prejudice by receiving SDCI's witness and exhibit list a few minutes late. This is nothing
2 more than a thinly veiled attempt by Moehring to make up for his failure to timely and
3 properly serve his motions for subpoenas.

4 **VI. CONCLUSION**

5 Based upon the foregoing, Moehring's motion should be denied and the hearing
6 should continue as scheduled on April 12, 2018.

7 Respectfully submitted this 11th day of April, 2018.

8
9 **HELSELL FETTERMAN LLP**

10 By: s/ Brandon S. Gribben

11 Brandon S. Gribben, WSBA No. 47638
12 Attorneys for Applicant Sound Equities Incorporated
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25

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on April 11, 2018, the foregoing document was sent for delivery on the following party in the manner indicated:

Appellant Contact:
David Moehring

☐ Via first class U. S. Mail
☐ Via Legal Messenger
☐ Via Facsimile
☒ Via Email to
dmoehring@consultant.com

Hearing Examiner
Office of Hearing Examiner
700 Fifth Avenue, Suite 4000
Seattle, WA 98104

☐ Via first class U. S. Mail
☐ Via Legal Messenger
☐ Via Facsimile
☒ Via Email to
Alayna.johnson@seattle.gov

Department Contact:
Joseph Hurley
SDCI
PO Box 34019
Seattle, WA 98124

☐ Via first class U. S. Mail
☐ Via Legal Messenger
☐ Via Facsimile
☒ Via Email to
joseph.hurley@seattle.gov

s/ Kyna Gonzalez
Kyna Gonzalez, Legal Assistant

EXHIBIT A

Hearing Examiner Ryan Vancil
March 8, 2018

**BEFORE THE HEARING EXAMINER
CITY OF SEATTLE**

In the Matter of the Appeal of:

David Moehring, a Neighbor to 3641 22nd
Ave West, to the Short Subdivision to
create two parcels of land from the lot at
3641 22nd Avenue West

Hearing Examiner File: MUP-18-001
Department Reference: 3028431

**APPELLANT'S SECOND
INTERROGATORIES AND REQUESTS
FOR DOCUMENTS TO RESPONDENT**

The Appellant, David Moehring, respectfully submits the attached interrogatories and requests for documents relative to the appeal originally issued on January 2, 2018 in accordance with Hearing Examiner Rule 3.11.

A handwritten signature in black ink, appearing to read "David Moehring", with a large, stylized loop at the end.

Dated March 8, 2018

Certificate of Service

I certify under penalty of perjury under the laws of the State of Washington that on this date I sent true and correct copies, via e-mail, of the attached David Moehring, the Neighbor to 3641 22nd Ave West, **second interrogatories and requests for documents** to every person listed below, in the matter of the **LAND USE DECISION APPEAL** to the Short Subdivision to create two parcels of land from 3641 22nd Avenue West lot, Hearing Examiner File No. MUP-18-001.

Department:

Joseph Hurley
Seattle Department of Construction & Inspections
Email: joseph.hurley@seattle.gov

Applicant:

Loren Landerholm
PO Box 99173
Seattle, WA 98139-0173
Email: soundequitiesinc@gmail.com

Applicant Legal Counsel:

Brandon Gribben
Email: bgribben@helsell.com

Office of the Hearing Examiner:

City of Seattle
Seattle, WA 98124
hearing.examiner@Seattle.gov

Dated March 8, 2018

A handwritten signature in black ink, appearing to read "David Moehring", with a large, loopy flourish at the end.

David Moehring
Appellant, Neighbor to 3641 22nd Avenue West
3444 23rd Ave West
Seattle WA 98199

BEFORE THE HEARING EXAMINER
FOR THE CITY OF SEATTLE

In the Matter of the Appeals of) Hearing Examiner File:
) MUP-18-001
DAVID MOEHRING, NEIGHBOR)
TO 3641 22ND AVE W)
) APPELLANT'S SECOND
Of the SHORT PLAT SUBDIVISION) INTERROGATORIES & REQUESTS FOR
to Create Two Parcels of Land from) DOCUMENTS TO RESPONDENT
the Lot at 3641 22nd Ave West)
)
TO: Respondent /Seattle Department of Construction and Inspections (hereafter SDCI)
COPY: Applicant to Short Subdivision

These are Appellant David Moehring's SECOND interrogatories and requests for documents under Washington Court Civil Rules CR 33 and 34. Under CR 33 and 34 the Respondent will serve Appellant with its responses within 30 days after service of the interrogatories and requests for documents. A Public Records request has also been submitted (reference number C024798-030818) on March 8, 2018 related to the property ownership at Seattle address 3641 22nd Ave West (Subject Property) per Public Records Request defined in RCW42.56. The interrogatories and requests for documents herein includes and goes beyond the ownership records Request Center. That request sought all statements of project and financial responsibility for all applications for land use alternations, permits, subdivisions relative to the Subject Property between August 10, 2015 and February 28, 2018. Applicant has failed to provide proof of ownership after 30 days of the first interrogatory.

SECOND INTERROGATORIES AND DOCUMENT REQUESTS TO RESPONDENT - 1

David Moehring AIA
3444 23rd Ave W, #B
Seattle, WA 98199

1 Per RCW 40.14.010, public records include “any paper, correspondence, completed form, bound
2 record book, photograph, film, sound recording, map drawing, machine-readable material,
3 compact disc meeting current industry ISO specifications, or other document, regardless of
4 physical form or characteristics, and including such copies thereof, that have been made by or
5 received by any agency of the state of Washington in connection with the transaction of public
6 business, and legislative records as described in RCW 40.14.100.”

7 8 **Background and Purpose**

9 The purpose of this request is to identify the name and justification of the property owner with
10 authority to the Subject Property, 3641 22nd Avenue West, Seattle WA 98199. A prior intent for
11 Discovery request was made on January 17, 2018 via email (Attachment No. 1) and has been
12 expanded herein following the pre-hearing of January 29, 2018 as advised by the Hearing
13 Examiner to case MUP-18-001.

14
15 The background to this request pertains to the public record demonstrating that Sound Equities,
16 hereafter identified as the ‘Applicant’, is the owner of the Subject Property relative to this
17 appeal. To date, there does not appear to be a public record that Sound Equities represents the
18 recorded property owner's interests. From what record is available on King County property
19 website and the SDCI project website, the Subject Property at 3641 22nd Ave West in Seattle is
20 owned by Debra Wood since at least since May 28, 2015 (see Figure 2 on last page). This date
21 excludes prior ownership before the Quit Claim Deed to Ms. Wood’s name.¹ Given Debra Wood
22 is assumed to still be the owner of record, then the June 16, 2017 ‘*Statement of Financial*
23 *Responsibility / Agent Authorization*’ (Attachment No. 2) submitted to SDCI which indicated that

24 _____
25 ¹ Refer to the property public records from King County; Refer to Figure 1 and Attachment No. 3 and
<http://blue.kingcounty.com/Assessor/eRealProperty/Detail.aspx?ParcelNbr=2770601655>

1 Sound Equities Inc is the 'Property Owner' would be incorrect². As far as what is available in the
2 cited public records, the actual owner of the Subject Property, assumed Ms. Wood, has not
3 signed any documents authorizing Sound Equities to act on behalf of her interests.

4 Without this authorization, the application relative to this appeal would not be valid and the
5 Applicant would not have the required standing to defend concerns raised in the appeal MUP-18-
6 001.³

7 This request is therefore relative to assure the proper Applicant is represented. Per HER 3.07
8 'PARTY REPRESENTATIVE REQUIRED':

9 *"When a party consists of more than one person, or is an organization or other entity, the party*
10 *shall designate an individual or firm to be its representative and provide written notification to*
11 *the Hearing Examiner and the other parties of contact information for the representative. (See*
12 *HER 3.01(d)(5).) The rights of such a party shall be exercised by the party representative. Notice*
13 *or other communication to the party representative is notice or communication to the party. (See*
14 *also HER 3.01(d)(5), and HER 3.08.)"*

15 To date, there is no written notification to the Hearing Examiner that the Applicant represents the
16 documented owner's interests nor that the representing attorney has been engaged by Debra
17 Wood, the assumed owner of the Subject Property. As such, the SDCI does not have consent
18 from the property owner and the title record to proceed with the application for short plat.

19 ² Questionable declaration of ownership on the SDCI project site:

20 <http://web6.seattle.gov/dpd/edms/GetDocument.aspx?src=WorkingDocs&id=861518>

21 ³ Refer to Seattle Municipal Code 23.24.030 – "Content of short plat." Which states several references to
22 the requirements of owner consent including

23 ○ "A. Every short plat of a short subdivision filed for record must contain:

24 1. A certificate giving a full correct description of the lands divided as they appear on the
25 short plat, including a statement that the short subdivision has been made with the free consent and in
accordance with the desires of the owner or owners.

4. All short plats containing a proposed dedication must be accompanied by a title report
confirming that the title of the lands as described and shown on the short plat is in the name of the
owner signing the certificate or instrument of dedication."

Definitions and Procedures

a. If the information requested in the following interrogatories and document requests is not reasonably available to you in precisely the form requested or for the particular date or period specified, but could be supplied in a modified form or for a slightly different date or period, you are requested to respond by stating the extent, if any, to which records and information reasonably available to you contain information on the subject matter and to give the best approximation or estimate of the information that you are able to make on the basis of the available records and information.

b. In answering these interrogatories and document requests you are required to furnish all information that is available to you, including information in the possession of your attorneys, or other persons directly or indirectly employed by you, representing you, or connected with you or your attorneys, or anyone on your behalf subject to your control or direction.

c. In answering these interrogatories and document requests, you must make a diligent search of your records and other papers and materials in your possession or under your control that are available to you and/or your representatives. If you cannot obtain records or information in time to answer these interrogatories, you may ask for an extension of time or explain in your answer the circumstances and what is being done to obtain the information.

d. If any of the interrogatories or document requests cannot be answered in full, please answer or respond to the extent possible, specifying the reason for the inability to answer or respond to the remainder, and stating what information or knowledge you have concerning the unanswered portion.

e. If the information is not available, state the efforts that were made to obtain the information and state the other source or sources from which the information might be obtained.

f. If any document is withheld under a claim of privilege or other protection, to aid the court and the parties in determining the validity of the claim of privilege or other protection, please provide the following information with respect to any such documents:

SECOND INTERROGATORIES AND DOCUMENT REQUESTS TO RESPONDENT - 4

1 (1) the nature and substance of the document with sufficient particularity to
2 enable the Hearing Examiner and parties hereto to identify the document;

3 (2) the date of the document;

4 (3) the identity of each person to whom copies of the document were
5 furnished; and

6 (4) the basis on which any privilege or other protection is claimed.

7 Whenever you object to a particular request, or portion thereof, you must produce all
8 documents called for which are not subject to that objection. Similarly, wherever a document is
9 not produced in full, please state with particularity the reason or reasons it is not being produced
10 in full, and describe, to the best of your knowledge, information and belief, and with as much
11 particularity as possible, those portions of the document which are not produced.

12 g. "Identify" defined.

13 When any interrogatory asks you to identify a person (whom you have not
14 previously identified) state the person's name, last known address and telephone number,
15 occupation, job title.

16 h. Document as used in these interrogatories and document requests include, without
17 limiting its generality, correspondence, papers, faxes, reports, titles, records, court dockets, court
18 files and papers found therein, notes, summaries, memoranda, memoranda of telephone
19 conversations, computer-generated and computer-recorded documents, e-mail, digital images or
20 kind or description.

21 i. Where you are called upon to identify a specific document, a copy of the
22 document may be attached to your answers, with a reference to such copy in your answer. If
23 there are no documents responsive to a particular interrogatory, state in your answer that there
24 are no documents.

25 j. "Confidential Information" defined: The term "Confidential Information" when
used in these interrogatories means:

SECOND INTERROGATORIES AND DOCUMENT REQUESTS TO RESPONDENT - 5

1. Passwords, access codes

2. All confidential information obtained from third parties concerning their products, business or equipment specifications;

Following the service of your answers to these interrogatories and requests for documents, you are subject to the duty of supplementation imposed by CR 26(e). Additionally, these interrogatories and requests for documents shall be deemed continuing and continuously renewed until the time of trial.

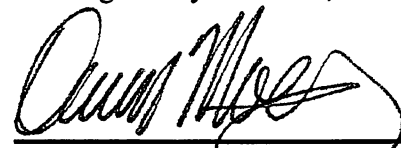
For the Respondent's convenience, these SECOND Interrogatories and Document Requests are provided in WORD to enable the Respondent to fill in the Answers on the original document using as much space as needed for that Answer.

The documents requested shall be produced within 30 days from the date of service of this Request and may be served electronically to the undersigned at dmoehring@consultant.com or, if voluminous, at such location as designated by the undersigned; the undersigned further reserves the right to examine the originals of the documents, and in that event will notify the Respondent of the time, date and place.

THESE INTERROGATORIES AND REQUESTS FOR DOCUMENTS ARE CONTINUING IN NATURE AND REQUIRE SUPPLEMENTAL ANSWERS UPON YOUR DISCOVERY OF FURTHER RESPONSIVE INFORMATION. IF ANY INFORMATION IS NOT FURNISHED 4 DAYS BEFORE THE ASSIGNED OR AGREED HEARING DATE, THE APPELLANT WILL MOVE AT THE TIME OF THE HEARING, OR PRIOR THERETO, FOR CONTINUANCE OF THE HEARING IN ORDER TO INVESTIGATE SUCH MATTERS AND FOR APPROPRIATE TERMS.

Dated this Eighth day of March, 2018

By:


DAVID MOEHRING AIA
Appellant (MUP-18-001)

INTERROGATORIES

All of these requests for information are relative to SDCI's involvement with King County Assessor Parcel #: 2770601655; including existing and proposed addresses on this parcel:

- (a) 3641 A 22ND Avenue West,
- (b) 3641 B 22ND Avenue West,
- (c) 3641 22ND Avenue W, and
- (d) 3641 D 22ND Avenue West.

Interrogatory No. 1: Identify each City employee who has reviewed for compliance all submitted '*Statement of Financial Responsibility / Agent Authorization*' or related owner representation documents for the applications relative to the Subject Property.

ANSWER:

Interrogatory No. 2: Identify each owner who has a title to the Subject Property at the time of the Short Plat / Subdivision application to the SDCI per the requirements of SMC 23.24.

ANSWER:

Interrogatory No. 3: If the answer to Interrogatory 2 includes the identity of anyone who has not been recorded as an Applicant at the time of the SDCI application, has that individual or individuals provided written authorization to the SDCI that the Applicant is authorized to act on their behalf? If so, include the date which this written authorization was received as well as whether or not this authorization was notarized.

ANSWER:

Interrogatory No. 4: Does the SDCI have any record of the Applicant (a) having a title of ownership to the Subject Property and (b) has the title been recorded with King County?

ANSWER:

[continued next page]

SECOND INTERROGATORIES AND DOCUMENT REQUESTS TO RESPONDENT - 7

1 **Interrogatory No. 5:** Permit application #6596711 accepted by SDCI on October 19, 2017 was
2 submitted by the Applicant to "Establish use rowhouse and construct new townhouse building,
3 *per plan*" (emphasis added). Does the SDCI have any record from the Applicant of the
4 designated "plan" for rowhouse and new townhouse building for this or any other application on
5 the Subject Property?

6 ANSWER:

7 **Interrogatory No. 6:** Permit application #6596711 includes an arborist e-mail dated October 17,
8 2017. This email from Ryan Ringe of Arbor Options, LLC states that "There were no (0) R.O.W.
9 trees, three (3) significant subject property trees (None Exceptional), and two (2) encroaching
10 adjacent property significant trees (including one Exceptional tree, #B)." By the provisions of
11 SMC Section 25.11.070 for Exceptional trees, has documents been submitted to show the
12 location of the exceptional tree relative to the Subject Property, including the tree's dripline and
13 root feeder zone?

14 ANSWER:

15 **Interrogatory No. 7:** Has the SDCI requested any alternative layouts of the short plat to the
16 Subject Property to evaluate whether the proposed division of land is designed to maximize the
17 retention [and protection of] of existing [significant and exceptional] trees per SMC 23.24.040?

18 ANSWER:

19 **Interrogatory No. 8:** Has the SDCI requested (a) all geotechnical evaluations in order to
20 demonstrate the application is in conformance to the applicable provisions of Section 25.09.240
21 in environmentally critical areas; and (b) has SDCI been provided records of the grades and
22 contours around the Subject Property prior to the sidewalks being installed in the Right-of-Way?

23 ANSWER:

24 **Interrogatory No. 9:** Has any requests for interpretation been received from the SDCI from the
25 Applicant for this or any other short subdivision application within Seattle since 1982? If so,
elaborate on the interpretations provided.

ANSWER:

SECOND INTERROGATORIES AND DOCUMENT REQUESTS TO RESPONDENT - 8

REQUESTS FOR PRODUCTION OF DOCUMENTS

Request for Production No.1: Please provide all documents identified at respondent's Answer to Interrogatory No. 3.

RESPONSE:

Request for Production No.2: Please provide all documents identified at respondent's Answer to Interrogatory No. 4 (a) and (b).

RESPONSE:

Request for Production No.3: Please provide all documents identified at respondent's Answer to Interrogatory No. 5.

RESPONSE:

Request for Production No.4: Please provide all documents identified at respondent's Answer to Interrogatory No. 6.

RESPONSE:

Request for Production No.5: Please provide all documents identified at respondent's Answer to Interrogatory No. 7.

RESPONSE:

Request for Production No.6: Please provide all documents identified at respondent's Answer to Interrogatory No. 8 (a) and (b).

RESPONSE:

Request for Production No.7: Please provide all documents identified at respondent's Answer to Interrogatory No. 9.

RESPONSE:


ANSWERS and RESPONSES submitted this ____ day of _____, 2018
By:

SECOND INTERROGATORIES AND DOCUMENT REQUESTS TO RESPONDENT - 9

David Moehring AIA
3444 23rd Ave W, #B
Seattle, WA 98199

Treasury Services

Property Tax Payment

Property Tax Home	Account/Parcel Summary	
Search	Tax Account Number	277060165507
FAQ	Parcel Number	2770601655
Support	Account Status	This account is active.
Automated Property Tax Information 206-263-2890	Tax Payer Name	WOOD DEBRA A 589999
Foreclosure 206-263-2649	Mailing Address	3641 22ND AVE W SEATTLE WA 98199
	Payment Status	2018 TAX AMOUNTS WILL BE AVAILABLE FEB 16, 2018. IF APPLICABLE, PRIOR YEAR(S) TAXES ARE DELINQUENT.
	Annual Statement Requested By	CENTRAL LOAN ADMINISTRATION
	Statement Request	Request Statement to be Mailed
	Select Payment Amount	

Reference: <http://info.kingcounty.gov/assessor/eRealProperty/Detail.aspx?ParcelNbr=2770601655>

Figure 1- King County's current Tax Account public record for the Subject Property

**Ownership per King County:

<http://blue.kingcounty.com/Assessor/eRealProperty/Detail.aspx?ParcelNbr=2770601655>

SALES HISTORY							
Excise Number	Recording Number	Document Date	Sale Price	Seller Name	Buyer Name	Instrument	Sale Reason
<u>2735288</u>	<u>20150608001128</u>	5/28/2015	\$0.00	DUGUERRE DEBRA A	WOOD DEBRA A	Quit Claim Deed	Other
<u>1524335</u>	<u>199701171161</u>	1/16/1997	\$147,000.00	PALMER MARK R+KALONI H	WOOD WILLIAM J+DEBRA A DUGUERRE	Statutory Warranty Deed	None
<u>1524336</u>	<u>199701171162</u>	12/10/1996	\$0.00	DUGUERRE DAVID D	DUGUERRE DEBRA A	Quit Claim Deed	Property Settlement

Figure 2- King County's current Sales History for the Subject Property

SECOND INTERROGATORIES AND DOCUMENT REQUESTS TO RESPONDENT - 10

David Moehring AIA
3444 23rd Ave W, #B
Seattle, WA 98199



ATTACHMENT
No.1

MUP 18-001 and SDCI project #3028431

From: "David Moehring" <dmoehring@consultant.com>
To: hearing.examiner@Seattle.gov
Cc: "Alayna.Johnson@seattle.gov" <Alayna.Johnson@seattle.gov>, "joseph.hurley@seattle.gov" <joseph.hurley@seattle.gov>, "Gribben, Brandon S." <BGribben@helsell.com>, "soundequitiesinc@gmail.com" <soundequitiesinc@gmail.com>, PRC <PRC@seattle.gov>
Bcc: "Bill Bradburd" <bill@grandscheme.com>, "Cindi Barker" <cindilbarker@gmail.com>, "Toby Thaler" <toby@louploup.net>
Date: Jan 17, 2018 8:00:39 AM

Dear Office of the Hearing Examiner,

(This message will be subsequently uploaded / appended to the Hearing Examiner's case file).

The response from the applicant's attorney would be contrary to the Office of Hearing Examiner's prior actions relative to the proposed Pro Tem (as indicated in the original motion). However, before I respond to the Applicant's Response in Opposition to Appellant's Motion for Reassignment of the Hearing Examiner, we need to know if we have all the authorized entities at the table. Is it possible for the Office of the Hearing Examiner and the SDCI to verify and confirm that (1) Helsell Fetterman LLP represents the owner of subject property; and (2) the declared financially responsible actually owns the property or is legally acting as the agent to the owner.

IDENTIFY the PROPERTY OWNER with AUTHORITY:

There is no record that Sound Equities owns the property nor is their record that Sound Equities represents the property owner's interests. From what record is available on King County and Seattle Dept of Construction Inspections, this property at 3641 22nd Ave W is owned by Debra Wood and has been since May 28, 2015 (and also prior ownership before the Quit Claim Deed). Refer to the attached pdf file "Detail_2770601..." property record from King County**. If indeed Debra Wood is the owner of record, then the June 16, 2017 submitted 'Statement of Financial Responsibility / Agent Authorization' which indicated that Sound Equities Inc is the 'Property Owner' would be incorrect. As far as indicated on record, the actual owner of the subject property has not signed any documents authorizing Sound Equities to act with her interests. If fact, the application for subdivision would also be incomplete and invalid.

NOTICE OF APPEARANCE without APPLICANT BEING SERVED:

In addition to lack of property ownership by the Applicant, there is no record that Sound Equities was served the attorney's Notice of Appearance as required by Hearing Examiner Rule 3.08. Please request that the authorized Applicant be served the Notice of Appearance from Helsell Fetterman LLP.

Thank you,
David Moehring AIA NCARB

* Questionable declaration of ownership on the SDCI project site:
<http://web6.seattle.gov/dpd/edms/GetDocument.aspx?src=WorkingDocs&id=861518>

**Ownership per King County:

<http://blue.kingcounty.com/Assessor/eRealProperty/Detail.aspx?ParcelNbr=2770601655>

SALES HISTORY

Excise Number	Recording Number	Document Date	Sale Price	Seller Name	Buyer Name	Instrument	R
<u>2735288</u>	<u>20150608001128</u>	5/28/2015	\$0.00	DUGUERRE DEBRA A	WOOD DEBRA A	Quit Claim Deed	Oth
<u>1524335</u>	<u>199701171161</u>	1/16/1997	\$147,000.00	PALMER MARK R+KALONI H	WOOD WILLIAM J+DEBRA A DUGUERRE	Statutory Warranty Deed	No
<u>1524336</u>	<u>199701171162</u>	12/10/1996	\$0.00	DUGUERRE DAVID D	DUGUERRE DEBRA A	Quit Claim Deed	Pro Set

3.07 PARTY REPRESENTATIVE REQUIRED

When a party consists of more than one person, or is an organization or other entity, the party shall designate an individual or firm to be its representative and provide written notification to the Hearing Examiner and the other parties of contact information for the representative. (See HER 3.01(d)(5).) The rights of such a party shall be exercised by the party representative. Notice or other communication to the party representative is notice or communication to the party. (See also HER 3.01(d)(5), and HER 3.08.)

3.08 NOTICE OF APPEARANCE

When a party is represented by an attorney, the attorney shall file a notice of appearance with the Hearing Examiner and serve a copy of the notice on the other parties at the earliest possible time in the proceedings. (See HER 3.07.)

Sent: Tuesday, January 16, 2018 at 11:10 AM

From: "Gonzalez, Kyna D." <kgonzalez@helsell.com>

To: "Alayna.Johnson@seattle.gov" <Alayna.Johnson@seattle.gov>, "dmoehring@consultant.com" <dmoehring@consultant.com>, "joseph.hurley@seattle.gov" <joseph.hurley@seattle.gov>

Cc: "Gribben, Brandon S." <BGribben@helsell.com>, "soundequitiesinc@gmail.com" <soundequitiesinc@gmail.com>

Subject: Moehring - MUP 18-001

Good morning:

Please see attached Applicant's Response in Opposition to Appellant's Motion for Reassignment of the Hearing Examiner. If you have any questions, please contact our office.

Kyna D. Gonzalez
Legal Assistant
Helsell Fetterman LLP
1001 Fourth Avenue, Suite 4200
Seattle, WA 98154
(206) 689-2480

ATTACHMENT
NO. 2



City of Seattle
Department of Construction and Inspections
700 Fifth Avenue, Suite 2000
P.O. Box 34019
Seattle, WA 98124-4019
(206) 684-8850

Seattle DCI Project Number

3028431

Statement of Financial Responsibility/ Agent Authorization

Project Address 3641 22nd AVE WEST

NAME AND ADDRESS OF FINANCIALLY RESPONSIBLE PARTY (Required)

A. Name of Individual or Entity (Company, Partnership, etc.) Assuming Financial Responsibility	SOUND EQUITIES INC
B. Name of Individual Signing on Behalf of an Entity (Company, Partnership, etc.)	LOREN LANDERHOLM PRESIDENT of SEI
C. Financially Responsible Party Relationship to Property	<input checked="" type="checkbox"/> Property Owner <input type="checkbox"/> Property Lessee <input type="checkbox"/> Property Contract Purchaser <input type="checkbox"/> Public Agency <input type="checkbox"/> Service Requestor (check only if request does not directly relate to the development of real property i.e. request for interpretation, legal building site letter)
D. Mailing Address (of individual signing statement)	P.O. Box 99173 Seattle WA 98139
E. Telephone (of individual signing statement)	206-669-2711
F. Email (of individual signing statement)	soundequitiesinc@gmail.com

Individual Declaration of Financial Responsibility (must match the individual's name listed in "A" above)

I _____ (printed name) declare that I am the _____ (relationship to project or service request) and that I am responsible for payment of all fees associated with this project or other request to DPD requiring payment of fees, including all hourly or other fees which may accrue during the review and/or post-issuance whether the permit is issued or whether the application is canceled or denied before the permit is issued.

Signature

Date

Entity Declaration of Financial Responsibility (must match the individual name in "B" above and have authority to bind entity named in "A" above)

I, LOREN LANDERHOLM (printed name) declare that in my capacity as PRESIDENT (position within entity - ie manager, CFO, etc) for SPOND EQUITIES INC (financially responsible entity named in "A" above) I have the authority to bind the Financially Responsible party named above to payment of all fees associated with this project or other request to DPD requiring payment of fees, including all hourly or other fees which may accrue during the review and/or post-issuance whether the permit is issued or whether the application is canceled or denied before the permit is issued.

LOREN LANDERHOLM PRESIDENT SET 6/16/17
Signature Date

AGENT AUTHORIZATION (Optional):

I hereby authorize the individual named below to act as the primary contact (aka primary applicant) for this project. This individual is not responsible for the payment of fees.

Primary Applicant Name: _____

Primary Applicant Phone: _____

Primary Applicant Email: _____

Primary Applicant Address: _____

ATTACHMENT NO. 3

King County Search Kingcounty.gov

Home How do I... Services About King County Departments

King County Department of Assessments
Fair, Equitable, and Understandable Property Valuations

You're In: Assessor >> Look up Property Info >> eReal Property

Department of Assessments

500 Fourth Avenue, Suite ADM-AS-0708, Seattle, WA 98104

Office Hours:
Mon - Fri
8:30 a.m. to
4:30 p.m.

TEL: 206-296-7300
FAX: 206-296-5107
TTY: 206-296-7888

Send us mail

ADVERTISEMENT

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PARCEL DATA

Parcel	277060-1655	Jurisdiction	SEATTLE
Name	WOOD DEBRA A	Levy Code	0010
Site Address	3641 22ND AVE W 98199	Property Type	R
Residential Area	011-003 (WC Appraisal District)	Plat Block / Building Number	12
Property Name		Plat Lot / Unit Number	21
		Quarter-Section-Township-Range	SE-14-25-3

Legal Description

GILMANS ADD
Plat Block: 12
Plat Lot: 21

LAND DATA

Highest & Best Use As if Vacant	SINGLE FAMILY	Percentage Unusable	
Highest & Best Use As Improved	PRESENT USE	Unbuildable	NO
Present Use	Single Family(Res Use/Zone)	Restrictive Size Shape	NO
Land SqFt	6,000	Zoning	LR1
Acres	0.14	Water	WATER DISTRICT
		Sewer/Septic	PUBLIC
		Road Access	PUBLIC
		Parking	
		Street Surface	PAVED

Views

Rainier	
Territorial	
Olympics	
Cascades	
Seattle Skyline	
Puget Sound	
Lake Washington	
Lake Sammamish	
Lake/River/Creek	
Other View	

Waterfront

Waterfront Location	
Waterfront Footage	0
Lot Depth Factor	0
Waterfront Bank	
Tide/Shore	
Waterfront Restricted Access	
Waterfront Access Rights	NO
Poor Quality	NO
Proximity Influence	NO

Designations

Historic Site	
Current Use	(none)
Nbr Bldg Sites	
Adjacent to Golf Fairway	NO
Adjacent to Greenbelt	NO
Other Designation	NO
Deed Restrictions	NO
Development Rights Purchased	NO
Easements	NO
Native Growth Protection Easement	NO
DNR Lease	NO

Nuisances

Topography	
Traffic Noise	
Airport Noise	
Power Lines	NO
Other Nuisances	NO

Problems

Water Problems	NO
Transportation Concurrency	NO
Other Problems	NO

Environmental

Environmental	NO
---------------	----

BUILDING

Building Number	1
Year Built	1904
Year Renovated	0
Stories	1.5
Living Units	1
Grade	6 Low Average
Grade Variant	0
Condition	Very Good
Basement Grade	
1st Floor	910
1/2 Floor	260
2nd Floor	0
Upper Floor	0

Picture of Building 1



Reference Links:

- [King County Tax Links](#)
- [Property Tax Advisor](#)
- [Washington State Department of Revenue \(External link\)](#)
- [Washington State Board of Tax Appeals \(External link\)](#)
- [Board of Appeals/Equalization](#)
- [Districts Report](#)
- [iMap](#)
- [Recorder's Office](#)

Scanned images of surveys and other map documents

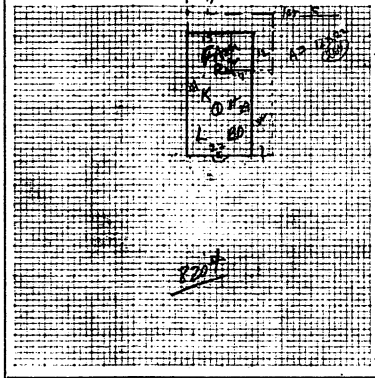
Scanned images of plats

Notice mailing date: 05/25/2017

ADVERTISEMENT

Finished Basement	0
Total Finished Area	1,170
Total Basement	0
Basement Garage	0
Unfinished 1/2	0
Unfinished Full	0
AGLA	1,170
Attached Garage	0
Bedrooms	3
Full Baths	1
3/4 Baths	0
1/2 Baths	0
Heat Source	Oil
Heat System	Forced Air
Deck Area SqFt	540
Open Porch SqFt	0
Enclosed Porch SqFt	0
Brick/Stone	0
Fireplace Single Story	0
Fireplace Multi Story	0
Fireplace Free Standing	1
Fireplace Additional	0
Addn/Cost	0
Obsolescence	0
Net Condition	0
Percentage Complete	0
Daylight Basement	
View Utilization	

Floor plan of Building 1



Accessory Of Building Number: 1

Accessory Type	Picture	Description	SqFt	Grade	Eft Year	%	Value	Date Valued
PRK:DET GAR			410	6 Low Average	1988			

TAX ROLL HISTORY

Account	Valued Year	Tax Year	Omit Year	Levy Code	Appraised Land Value (\$)	Appraised Imps Value (\$)	Appraised Total Value (\$)	New Dollars (\$)	Taxable Land Value (\$)	Taxable Imps Value (\$)	Taxable Total Value (\$)	Tax Value Reason
277060165507	2017	2018		0010	375,000	198,000	573,000	0	375,000	198,000	573,000	
277060165507	2016	2017		0010	342,000	180,000	522,000	0	342,000	180,000	522,000	
277060165507	2015	2016		0010	311,000	160,000	471,000	0	311,000	160,000	471,000	
277060165507	2014	2015		0010	266,000	138,000	404,000	0	266,000	138,000	404,000	
277060165507	2013	2014		0010	257,000	110,000	367,000	0	257,000	110,000	367,000	
277060165507	2012	2013		0010	234,000	74,000	308,000	0	234,000	74,000	308,000	
277060165507	2011	2012		0010	394,000	2,000	396,000	0	394,000	2,000	396,000	
277060165507	2010	2011		0010	405,000	2,000	407,000	0	405,000	2,000	407,000	
277060165507	2009	2010		0010	405,000	15,000	420,000	0	405,000	15,000	420,000	
277060165507	2008	2009		0010	436,000	73,000	509,000	0	436,000	73,000	509,000	
277060165507	2007	2008		0010	399,000	66,000	465,000	0	399,000	66,000	465,000	
277060165507	2006	2007		0010	363,000	36,000	399,000	0	363,000	36,000	399,000	
277060165507	2005	2006		0010	126,000	164,000	290,000	0	126,000	164,000	290,000	
277060165507	2004	2005		0010	117,000	151,000	268,000	0	117,000	151,000	268,000	
277060165507	2003	2004		0010	113,000	145,000	258,000	0	113,000	145,000	258,000	
277060165507	2002	2003		0010	107,000	136,000	243,000	0	107,000	136,000	243,000	
277060165507	2001	2002		0010	98,000	135,000	233,000	0	98,000	135,000	233,000	
277060165507	2000	2001		0010	89,000	110,000	199,000	0	89,000	110,000	199,000	
277060165507	1999	2000		0010	97,000	81,000	178,000	0	97,000	81,000	178,000	
277060165507	1998	1999		0010	89,000	59,000	148,000	0	89,000	59,000	148,000	
277060165507	1997	1998		0010	0	0	0	0	77,000	51,000	128,000	
277060165507	1996	1997		0010	0	0	0	0	70,000	47,700	117,700	
277060165507	1994	1995		0010	0	0	0	0	70,000	47,700	117,700	
277060165507	1992	1993		0010	0	0	0	0	66,900	45,200	112,100	
277060165507	1990	1991		0010	0	0	0	0	59,200	40,000	99,200	
277060165507	1988	1989		0010	0	0	0	0	35,000	29,800	64,800	
277060165507	1986	1987		0010	0	0	0	0	46,000	31,500	77,500	
277060165507	1984	1985		0010	0	0	0	0	37,000	21,700	58,700	
277060165507	1982	1983		0010	0	0	0	0	37,000	17,800	54,800	

SALES HISTORY

Excise Number	Recording Number	Document Date	Sale Price	Seller Name	Buyer Name	Instrument	Sale Reason
2735288	20150608001128	5/28/2015	\$0.00	DUGUERRE DEBRA A	WOOD DEBRA A	Quit Claim Deed	Other
1524335	199701171161	1/16/1997	\$147,000.00	PALMER MARK R+KALONI H	WOOD WILLIAM J+DEBRA A DUGUERRE	Statutory Warranty Deed	None
1524338	199701171162	12/10/1996	\$0.00	DUGUERRE DAVID D	DUGUERRE DEBRA A	Quit Claim Deed	Property Settlement

REVIEW HISTORY

EXHIBIT B

1
2
3
4
5 BEFORE THE HEARING EXAMINER
6 FOR THE CITY OF SEATTLE

7 In the Matter of the Appeals of) Hearing Examiner File:
8 DAVID MOEHRING, NEIGHBOR) MUP-18-001
9 TO 3641 22ND AVE W)
10 Of the SHORT PLAT SUBDIVISION) APPELLANT'S SECOND
11 to Create Two Parcels of Land from) INTERROGATORIES & REQUESTS FOR
12 the Lot at 3641 22nd Ave West) DOCUMENTS TO RESPONDENT
13)

14 TO: Respondent /Seattle Department of Construction and Inspections (hereafter SDCI)
15 COPY: Applicant to Short Subdivision
16
17
18
19
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21
22
23
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25

These are Appellant David Moehring's SECOND interrogatories and requests for documents under Washington Court Civil Rules CR 33 and 34. Under CR 33 and 34 the Respondent will serve Appellant with its responses within 30 days after service of the interrogatories and requests for documents. A Public Records request has also been submitted (reference number C024798-030818) on March 8, 2018 related to the property ownership at Seattle address 3641 22nd Ave West (Subject Property) per Public Records Request defined in RCW42.56. The interrogatories and requests for documents herein includes and goes beyond the ownership records Request Center. That request sought all statements of project and financial responsibility for all applications for land use alternations, permits, subdivisions relative to the Subject Property between August 10, 2015 and February 28, 2018. Applicant has failed to provide proof of ownership after 30 days of the first interrogatory.

1 Per RCW 40.14.010, public records include “any paper, correspondence, completed form, bound
2 record book, photograph, film, sound recording, map drawing, machine-readable material,
3 compact disc meeting current industry ISO specifications, or other document, regardless of
4 physical form or characteristics, and including such copies thereof, that have been made by or
5 received by any agency of the state of Washington in connection with the transaction of public
6 business, and legislative records as described in RCW 40.14.100.”

7 8 **Background and Purpose**

9 The purpose of this request is to identify the name and justification of the property owner with
10 authority to the Subject Property, 3641 22nd Avenue West, Seattle WA 98199. A prior intent for
11 Discovery request was made on January 17, 2018 via email (Attachment No. 1) and has been
12 expanded herein following the pre-hearing of January 29, 2018 as advised by the Hearing
13 Examiner to case MUP-18-001.

14
15 The background to this request pertains to the public record demonstrating that Sound Equities,
16 hereafter identified as the ‘Applicant’, is the owner of the Subject Property relative to this
17 appeal. To date, there does not appear to be a public record that Sound Equities represents the
18 recorded property owner's interests. From what record is available on King County property
19 website and the SDCI project website, the Subject Property at 3641 22nd Ave West in Seattle is
20 owned by Debra Wood since at least since May 28, 2015 (see Figure 2 on last page). This date
21 excludes prior ownership before the Quit Claim Deed to Ms. Wood’s name.¹ Given Debra Wood
22 is assumed to still be the owner of record, then the June 16, 2017 ‘*Statement of Financial*
23 *Responsibility / Agent Authorization*’ (Attachment No. 2) submitted to SDCI which indicated that

24 ¹ Refer to the property public records from King County; Refer to Figure 1 and Attachment No. 3 and
25 <http://blue.kingcounty.com/Assessor/eRealProperty/Detail.aspx?ParcelNbr=2770601655>

1 Sound Equities Inc is the 'Property Owner' would be incorrect². As far as what is available in the
2 cited public records, the actual owner of the Subject Property, assumed Ms. Wood, has not
3 signed any documents authorizing Sound Equities to act on behalf of her interests.

4 Without this authorization, the application relative to this appeal would not be valid and the
5 Applicant would not have the required standing to defend concerns raised in the appeal MUP-18-
6 001.³

7 This request is therefore relative to assure the proper Applicant is represented. Per HER 3.07
8 'PARTY REPRESENTATIVE REQUIRED':

9 *"When a party consists of more than one person, or is an organization or other entity, the party*
10 *shall designate an individual or firm to be its representative and provide written notification to*
11 *the Hearing Examiner and the other parties of contact information for the representative. (See*
12 *HER 3.01(d)(5).) The rights of such a party shall be exercised by the party representative. Notice*
13 *or other communication to the party representative is notice or communication to the party. (See*
14 *also HER 3.01(d)(5), and HER 3.08.)"*

15 To date, there is no written notification to the Hearing Examiner that the Applicant represents the
16 documented owner's interests nor that the representing attorney has been engaged by Debra
17 Wood, the assumed owner of the Subject Property. As such, the SDCI does not have consent
18 from the property owner and the title record to proceed with the application for short plat.

19 ² Questionable declaration of ownership on the SDCI project site:

20 <http://web6.seattle.gov/dpd/edms/GetDocument.aspx?src=WorkingDocs&id=861518>

21 ³ Refer to Seattle Municipal Code 23.24.030 – "Content of short plat." Which states several references to
22 the requirements of owner consent including

23 ○ "A. Every short plat of a short subdivision filed for record must contain:

24 1. A certificate giving a full correct description of the lands divided as they appear on the short
25 plat, including a statement that the short subdivision has been made with the free consent and in
26 accordance with the desires of the owner or owners.

27 4. All short plats containing a proposed dedication must be accompanied by a title report
28 confirming that the title of the lands as described and shown on the short plat is in the name of the
29 owner signing the certificate or instrument of dedication."

30 SECOND INTERROGATORIES AND DOCUMENT REQUESTS TO RESPONDENT -3

1 **Definitions and Procedures**

2 a. If the information requested in the following interrogatories and document requests is
3 not reasonably available to you in precisely the form requested or for the particular
4 date or period specified, but could be supplied in a modified form or for a slightly different date
5 or period, you are requested to respond by stating the extent, if any, to which records and
6 information reasonably available to you contain information on the subject matter and to give the
7 best approximation or estimate of the information that you are able to make on the basis of the
8 available records and information.

9 b. In answering these interrogatories and document requests you are required to
10 furnish all information that is available to you, including information in the possession of your
11 attorneys, or other persons directly or indirectly employed by you, representing you, or
12 connected with you or your attorneys, or anyone on your behalf subject to your control or
13 direction.

14 c. In answering these interrogatories and document requests, you must make a
15 diligent search of your records and other papers and materials in your possession or under your
16 control that are available to you and/or your representatives. If you cannot obtain records or
17 information in time to answer these interrogatories, you may ask for an extension of time or
18 explain in your answer the circumstances and what is being done to obtain the information.

19 d. If any of the interrogatories or document requests cannot be answered in full,
20 please answer or respond to the extent possible, specifying the reason for the inability to answer
21 or respond to the remainder, and stating what information or knowledge you have concerning the
22 unanswered portion.

23 e. If the information is not available, state the efforts that were made to obtain the
24 information and state the other source or sources from which the information might be obtained.

25 f. If any document is withheld under a claim of privilege or other protection, to aid
the court and the parties in determining the validity of the claim of privilege or other protection,
please provide the following information with respect to any such documents:

SECOND INTERROGATORIES AND DOCUMENT REQUESTS TO RESPONDENT -4

- 1 (1) the nature and substance of the document with sufficient particularity to
2 enable the Hearing Examiner and parties hereto to identify the document;
3 (2) the date of the document;
4 (3) the identity of each person to whom copies of the document were
5 furnished; and
6 (4) the basis on which any privilege or other protection is claimed.

7 Whenever you object to a particular request, or portion thereof, you must produce all
8 documents called for which are not subject to that objection. Similarly, wherever a document is
9 not produced in full, please state with particularity the reason or reasons it is not being produced
10 in full, and describe, to the best of your knowledge, information and belief, and with as much
11 particularity as possible, those portions of the document which are not produced.

12 g. "Identify" defined.

13 When any interrogatory asks you to identify a person (whom you have not
14 previously identified) state the person's name, last known address and telephone number,
15 occupation, job title.

16 h. Document as used in these interrogatories and document requests include, without
17 limiting its generality, correspondence, papers, faxes, reports, titles, records, court dockets, court
18 files and papers found therein, notes, summaries, memoranda, memoranda of telephone
19 conversations, computer-generated and computer-recorded documents, e-mail, digital images or
20 photographs, and all other printed, typewritten, written, electronic, or recorded matter of any
21 kind or description.

22 i. Where you are called upon to identify a specific document, a copy of the
23 document may be attached to your answers, with a reference to such copy in your answer. If
24 there are no documents responsive to a particular interrogatory, state in your answer that there
25 are no documents.

j. "Confidential Information" defined: The term "Confidential Information" when
used in these interrogatories means:

Seattle, WA 98199

1 1. Passwords, access codes

2 2. All confidential information obtained from third parties concerning their
3 products, business or equipment specifications;

4 Following the service of your answers to these interrogatories and requests for
5 documents, you are subject to the duty of supplementation imposed by CR 26(e). Additionally,
6 these interrogatories and requests for documents shall be deemed continuing and continuously
7 renewed until the time of trial.

8 For the Respondent's convenience, these SECOND Interrogatories and Document
9 Requests are provided in WORD to enable the Respondent to fill in the Answers on the original
10 document using as much space as needed for that Answer.

11 The documents requested shall be produced within 30 days from the date of service of
12 this Request and may be served electronically to the undersigned at dmoehring@consultant.com
13 or, if voluminous, at such location as designated by the undersigned; the undersigned further
14 reserves the right to examine the originals of the documents, and in that event will notify the
15 Respondent of the time, date and place.

16 **THESE INTERROGATORIES AND REQUESTS FOR DOCUMENTS**
17 **ARE CONTINUING IN NATURE AND REQUIRE SUPPLEMENTAL**
18 **ANSWERS UPON YOUR DISCOVERY OF FURTHER RESPONSIVE**
19 **INFORMATION. IF ANY INFORMATION IS NOT FURNISHED 4 DAYS**
20 **BEFORE THE ASSIGNED OR AGREED HEARING DATE, THE**
21 **APPELLANT WILL MOVE AT THE TIME OF THE HEARING, OR**
22 **PRIOR THERETO, FOR CONTINUANCE OF THE HEARING IN**
23 **ORDER TO INVESTIGATE SUCH MATTERS AND FOR APPROPRIATE**
24 **TERMS.**

25 Dated this Eighth day of March, 2018

By: 

DAVID MOEHRING AIA
Appellant (MUP-18-001)

INTERROGATORIES

All of these requests for information are relative to SDCI's involvement with King County Assessor Parcel #: 2770601655; including existing and proposed addresses on this parcel:

- (a) 3641 A 22ND Avenue West,
- (b) 3641 B 22ND Avenue West,
- (c) 3641 22ND Avenue W, and
- (d) 3641 D 22ND Avenue West.

Interrogatory No. 1: Identify each City employee who has reviewed for compliance all submitted '*Statement of Financial Responsibility / Agent Authorization*' or related owner representation documents for the applications relative to the Subject Property.

ANSWER: Intake staff. Staff review is for completeness and does not include any investigation.

Interrogatory No. 2: Identify each owner who has a title to the Subject Property at the time of the Short Plat / Subdivision application to the SDCI per the requirements of SMC 23.24.

ANSWER: SDCI does not review title history or ownership as part of the short plat application process.

Interrogatory No. 3: If the answer to Interrogatory 2 includes the identity of anyone who has not been recorded as an Applicant at the time of the SDCI application, has that individual or individuals provided written authorization to the SDCI that the Applicant is authorized to act on their behalf? If so, include the date which this written authorization was received as well as whether or not this authorization was notarized.

ANSWER: SDCI does not review title history or ownership as part of the short plat application process.

Interrogatory No. 4: Does the SDCI have any record of the Applicant (a) having a title of ownership to the Subject Property and (b) has the title been recorded with King County?

ANSWER: SDCI does not review title history or ownership as part of the short plat application process.

[continued next page]

1 **Interrogatory No. 5:** Permit application #6596711 accepted by SDCI on October 19, 2017 was
2 submitted by the Applicant to “Establish use rowhouse and construct new townhouse building,
3 *per plan*” (emphasis added). Does the SDCI have any record from the Applicant of the
4 designated “plan” for rowhouse and new townhouse building for this or any other application on
5 the Subject Property?

6 ANSWER: Building permit application materials are not included in the documents
7 reviewed in the short plat application process.
8

9 **Interrogatory No. 6:** Permit application #6596711 includes an arborist e-mail dated October 17,
10 2017. This email from Ryan Ringe of Arbor Options, LLC states that “There were no (0) R.O.W.
11 trees, three (3) significant subject property trees (None Exceptional), and two (2) encroaching
12 adjacent property significant trees (including one Exceptional tree, #B).” By the provisions of
13 SMC Section 25.11.070 for Exceptional trees, has documents been submitted to show the
14 location of the exceptional tree relative to the Subject Property, including the tree’s dripline and
15 root feeder zone?

16 ANSWER: No. Review for compliance with SMC 25.11 is not included in the short plat
17 application process.
18

19 **Interrogatory No. 7:** Has the SDCI requested any alternative layouts of the short plat to the
20 Subject Property to evaluate whether the proposed division of land is designed to maximize the
21 retention [and protection of] of existing [significant and exceptional] trees per SMC 23.24.040?
22

23 ANSWER: No. SDCI staff reviewed the application for compliance with Section
24 23.24.040.A.6 and concluded that there was not another division of the property that
would better maximize the retention of existing trees.

Interrogatory No. 8: Has the SDCI requested (a) all geotechnical evaluations in order to
demonstrate the application is in conformance to the applicable provisions of Section 25.09.240
in environmentally critical areas; and (b) has SDCI been provided records of the grades and
contours around the Subject Property prior to the sidewalks being installed in the Right-of-Way?

ANSWER: (a) Geotechnical information is not reviewed in the short plat application
process.

(b) Topography is not reviewed in the short plat application process.

Interrogatory No. 9: Has any requests for interpretation been received from the SDCI from the
Applicant for this or any other short subdivision application within Seattle since 1982? If so,
elaborate on the interpretations provided.

ANSWER: Review of applicant’s previous requests for interpretation, if any, are not
included in the short plat application process. SDCI objects to this question on grounds
of relevancy.

SECOND INTERROGATORIES AND DOCUMENT REQUESTS TO RESPONDENT -8

David Moehring AIA
3444 23rd Ave W, #B
Seattle, WA 98199

REQUESTS FOR PRODUCTION OF DOCUMENTS

Request for Production No.1: Please provide all documents identified at respondent's Answer to Interrogatory No. 3.

RESPONSE: N.A.

Request for Production No.2: Please provide all documents identified at respondent's Answer to Interrogatory No. 4 (a) and (b).

RESPONSE: N.A.

Request for Production No.3: Please provide all documents identified at respondent's Answer to Interrogatory No. 5.

RESPONSE: : N.A.

Request for Production No.4: Please provide all documents identified at respondent's Answer to Interrogatory No. 6.

RESPONSE: : N.A.

Request for Production No.5: Please provide all documents identified at respondent's Answer to Interrogatory No. 7.

RESPONSE: : N.A.

Request for Production No.6: Please provide all documents identified at respondent's Answer to Interrogatory No. 8 (a) and (b).

RESPONSE: : N.A., already provided and on EDMS

Request for Production No.7: Please provide all documents identified at respondent's Answer to Interrogatory No. 9.

RESPONSE: : N.A.

ANSWERS and RESPONSES submitted this 9th day of April, 2018
By: Joseph Hurley, Reg. Architect, SDCI Land Use Planner, signature
on file

Treasury Services

Property Tax Payment

Property Tax Home

Search

FAQ

Support

Automated Property Tax
Information
206-263-2890

Foreclosure
206-263-2649



Account/Parcel Summary

Tax Account Number	277060165507
Parcel Number	2770601655
Account Status	This account is active.
Tax Payer Name	WOOD DEBRA A 589999
Mailing Address	3641 22ND AVE W SEATTLE WA 98199
Payment Status	2018 TAX AMOUNTS WILL BE AVAILABLE FEB 16, 2018. IF APPLICABLE, PRIOR YEAR(S) TAXES ARE DELINQUENT.
Annual Statement Requested By	CENTRAL LOAN ADMINISTRATION
Statement Request	Request Statement to be Mailed
Select Payment Amount	

Reference: <http://blue.kingcounty.com/Assessor/eRealProperty/Detail.aspx?ParcelNbr=2770601655>

Figure 1- King County's current Tax Account public record for the Subject Property

**Ownership per King County:

<http://blue.kingcounty.com/Assessor/eRealProperty/Detail.aspx?ParcelNbr=2770601655>

SALES HISTORY

Excise Number	Recording Number	Document Date	Sale Price	Seller Name	Buyer Name	Instrument	Sale Reason
<u>2735288</u>	<u>20150608001128</u>	5/28/2015	\$0.00	DUGUERRE DEBRA A	WOOD DEBRA A	Quit Claim Deed	Other
<u>1524335</u>	<u>199701171161</u>	1/16/1997	\$147,000.00	PALMER MARK R+KALONI H	WOOD WILLIAM J+DEBRA A DUGUERRE	Statutory Warranty Deed	None
<u>1524336</u>	<u>199701171162</u>	12/10/1996	\$0.00	DUGUERRE DAVID D	DUGUERRE DEBRA A	Quit Claim Deed	Property Settlement

Figure 2- King County's current Sales History for the Subject Property

MUP 18-001 and SDCI project #3028431

From: "David Moehring" <dmoehring@consultant.com>
To: hearing.examiner@Seattle.gov
Cc: "Alayna.Johnson@seattle.gov" <Alayna.Johnson@seattle.gov>, "joseph.hurley@seattle.gov" <joseph.hurley@seattle.gov>, "Gribben, Brandon S." <BGribben@helsell.com>, "soundequitiesinc@gmail.com" <soundequitiesinc@gmail.com>, PRC <PRC@seattle.gov>
Bcc: "Bill Bradburd" <bill@grandscheme.com>, "Cindi Barker" <cindilbarker@gmail.com>, "Toby Thaler" <toby@louploup.net>
Date: Jan 17, 2018 8:00:39 AM

Dear Office of the Hearing Examiner,

(This message will be subsequently uploaded / appended to the Hearing Examiner's case file).

The response from the applicant's attorney would be contrary to the Office of Hearing Examiner's prior actions relative to the proposed Pro Tem (as indicated in the original motion). However, before I respond to the Applicant's Response in Opposition to Appellant's Motion for Reassignment of the Hearing Examiner, we need to know if we have all the authorized entities at the table. Is it possible for the Office of the Hearing Examiner and the SDCI to verify and confirm that (1) Helsell Fetterman LLP represents the owner of subject property; and (2) the declared financially responsible actually owns the property or is legally acting as the agent to the owner.

IDENTIFY the PROPERTY OWNER with AUTHORITY:

There is no record that Sound Equities owns the property nor is their record that Sound Equities represents the property owner's interests. From what record is available on King County and Seattle Dept of Construction Inspections, this property at 3641 22nd Ave W is owned by Debra Wood and has been since May 28, 2015 (and also prior ownership before the Quit Claim Deed). Refer to the attached pdf file "Detail_2770601..." property record from King County**. If indeed Debra Wood is the owner of record, then the June 16, 2017 submitted 'Statement of Financial Responsibility / Agent Authorization' which indicated that Sound Equities Inc is the 'Property Owner' would be incorrect. As far as indicated on record, the actual owner of the subject property has not signed any documents authorizing Sound Equities to act with her interests. If fact, the application for subdivision would also be incomplete and invalid.

NOTICE OF APPEARANCE without APPLICANT BEING SERVED:

In addition to lack of property ownership by the Applicant, there is no record that Sound Equities was served the attorney's Notice of Appearance as required by Hearing Examiner Rule 3.08. Please request that the authorized Applicant be served the Notice of Appearance from Helsell Fetterman LLP.

Thank you,
David Moehring AIANCARB

* Questionable declaration of ownership on the SDCI project site:
<http://web6.seattle.gov/dpd/edms/GetDocument.aspx?src=WorkingDocs&id=861518>

**Ownership per King County:

<http://blue.kingcounty.com/Assessor/eRealProperty/Detail.aspx?ParcelNbr=2770601655>

Excise Number	Recording Number	Document Date	Sale Price	Seller Name	Buyer Name	Instrument	R
<u>2735288</u>	<u>20150608001128</u>	5/28/2015	\$0.00	DUGUERRE DEBRA A	WOOD DEBRA A	Quit Claim Deed	Other
<u>1524335</u>	<u>199701171161</u>	1/16/1997	\$147,000.00	PALMER MARK R+KALONI H	WOOD WILLIAM J+DEBRA A DUGUERRE	Statutory Warranty Deed	No
<u>1524336</u>	<u>199701171162</u>	12/10/1996	\$0.00	DUGUERRE DAVID D	DUGUERRE DEBRA A	Quit Claim Deed	Pro Set

3.7 PARTY REPRESENTATIVE REQUIRED

When a party consists of more than one person, or is an organization or other entity, the party shall designate an individual or firm to be its representative and provide written notification to the Hearing Examiner and the other parties of contact information for the representative. (See HER 3.01(d)(5).) The rights of such a party shall be exercised by the party representative. Notice or other communication to the party representative is notice or communication to the party. (See also HER 3.01(d)(5), and HER 3.08.)

3.8 NOTICE OF APPEARANCE

When a party is represented by an attorney, the attorney shall file a notice of appearance with the Hearing Examiner and serve a copy of the notice on the other parties at the earliest possible time in the proceedings. (See HER 3.07.)

Sent: Tuesday, January 16, 2018 at 11:10 AM

From: "Gonzalez, Kyna D." <kgonzalez@helsell.com>

To: "Alayna.Johnson@seattle.gov" <Alayna.Johnson@seattle.gov>, "dmoehring@consultant.com" <dmoehring@consultant.com>, "joseph.hurley@seattle.gov" <joseph.hurley@seattle.gov>

Cc: "Gribben, Brandon S." <BGribben@helsell.com>, "soundequitiesinc@gmail.com" <soundequitiesinc@gmail.com>

Subject: Moehring - MUP 18-001

Good morning:

Please see attached Applicant's Response in Opposition to Appellant's Motion for Reassignment of the Hearing Examiner. If you have any questions, please contact our office.

Kyna D. Gonzalez
Legal Assistant
Helsell Fetterman LLP
1001 Fourth Avenue, Suite 4200
Seattle, WA 98154
(206) 689-2480

ATTACHMENT
NO. 2



City of Seattle
Department of Construction and Inspections
700 Fifth Avenue, Suite 2000
P.O. Box 34019
Seattle, WA 98124-4019
(206) 684-8850

Seattle DCI Project Number

3028431

Statement of Financial Responsibility/ Agent Authorization

Project Address 3641 22nd AVE WEST

NAME AND ADDRESS OF FINANCIALLY RESPONSIBLE PARTY (Required)

A. Name of Individual or Entity (Company, Partnership, etc.) Assuming Financial Responsibility	SOUND EQUITIES INC
B. Name of Individual Signing on Behalf of an Entity (Company, Partnership, etc.)	LOREN LANDERHOLM PRESIDENT of SEI
C. Financially Responsible Party Relationship to Property	<input checked="" type="checkbox"/> Property Owner <input type="checkbox"/> Property Lessee <input type="checkbox"/> Property Contract Purchaser <input type="checkbox"/> Public Agency <input type="checkbox"/> Service Requestor (check only if request does not directly relate to the development of real property i.e. request for interpretation, legal building site letter)
D. Mailing Address (of individual signing statement)	P.O. Box 99173 Seattle WA 98139
E. Telephone (of individual signing statement)	206-669-2711
F. Email (of individual signing statement)	soundequitiesinc@gmail.com

Individual Declaration of Financial Responsibility (must match the individual's name listed in "A" above)

I _____ (printed name) declare that I am the _____ (relationship to project or service request) and that I am responsible for payment of all fees associated with this project or other request to DPD requiring payment of fees, including all hourly or other fees which may accrue during the review and/or post-issuance whether the permit is issued or whether the application is canceled or denied before the permit is issued.

Signature

Date

Entity Declaration of Financial Responsibility (must match the individual name in "8" above and have authority to bind entity named in "A" above)

LOREN IAJJI, UJI W, \

(printed name) declare that in my capacity as

PRESIDENT

(position within entity - ie manager,

CFO, etc for SD...NO... in LLC,

(financially responsible entity

named in " " above) I have the authority to bind the Financially Responsible party named above to payment of all fees associated with this project or other request to DPD requiring payment of fees, including all hourly or other fees which may accrue during the review and/or post-issuance whether the permit is issued or whether the applicati is canceled or denied before the permit is issued.

PRESIDENT
Signature

6/16/17
Date

AGENT AUTHORIZATION (Optional):

I hereby authorize the individual named below to act as the primary contact (aka primary applicant) for this project. This individual is not responsible for the payment of fees.

Primary Applicant Name: _____

Primary Applicant Phone: _____

Primary Applicant Email: _____

Primary Applicant Address: _____

King County Department of Assessments

Fair, Equitable, and Understandable Property Valuations

You're In: Assessor >> Look up Property Info >> eReal Property

Department
of
Assessments

500 Fourth
Avenue,
Suite ADM-
AS-0708,
Seattle, WA
98104

Office Hours:

Mon - Fri
8:30 a.m. to
4:30 p.m.

TEL: 206-296-7300
FAX: 206-296-5107
TTY: 206-296-7888

Send us
mail

Reference Links:

11 King County Tax
12 Links

c: Property Tax Advisor

cc: Washington State
Department of

Revenue([External link](#))

Washington State
Board of Tax
Appeals(External
link)

Board of Appeals/Equalization

Districts Report

iMap

Recorder's Office

Scanned images of
surveys and other
map documents

Scanned images of
plats

Notice mailing date:
05/25/2017

ADVERTISEMENT

ADVERTISEMENT

PARCEL DATA

Parcel	277060-1655	Jurisdiction	SEATTLE
Name	WOOD,DEBRA A	Levy Code	0010
Site Address	3641 22ND AVE W 98199	Property Type	R
Residential Area	011-003 (WC Appraisal District)	Plat Block / Building Number	12
		Plat Lot / Unit Number	21
Property Name		Quarter/Section/Township-	
		Range	<u>SE-14-25-3</u>

Legal Description

GILMANS ADD
Plat Block: 12
Plat Lot: 21

LANDDATA

Highest & Best Use As If Vacant	SINGLE FAMILY		
Highest & Best Use As			
Improved	PRESENT USE		
Present Use	Single Family(Res Use/Zone)		
Land SqFt	6,000		
Acres	0.14		
	Views		
Rainier			
Territorial			
Olympics			
Cascades			
Seattle Skyline			
Puget Sound			
Lake Washington			
Lake Sammamish			
Lake/River/Creek			
Other View			
	Designations		

Percentage Unusable			
Unbuildable	NO		
Restrictive Size Shape	NO		
Zoning	LR1		
Water	WATER DISTRICT		
Sewer/Septic	PUBLIC		
Road Access	PUBLIC		
Parking			
Street Surface	PAVED		
	Waterfront		
Waterfront Location			
Waterfront Footage	0		
Lot Depth Factor	0		
Waterfront Bank			
Tide/Shore			
Waterfront Restricted Access			
Waterfront Access Rights	NO		
Poor Quality	NO		
Proximity Influence	NO		
	Nuisances		

Topography

<p>Traffic Noise</p> <p>Airport Noise</p>	
Power Lines	NO
Other Nuisances	NO
<p align="center">Problems</p>	
Water Problems	NO
Transportation Congruency	NO
Other Problems	NO

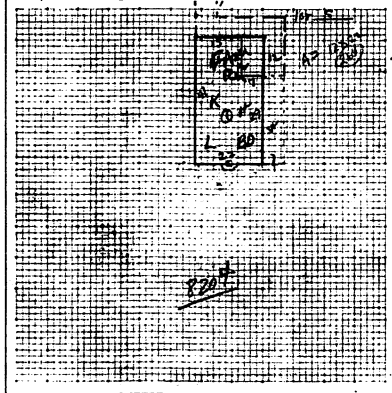
Environ



Development Rights Purchased	NO
Easements	NO
Native Growth Protection	NO
Easement	
DNR Lease	NO
Building Number	1
Year Built	1904
Year Renovated	0
Stories	1.5
Living Units	1
Grade	6 Low Average
Grade Variant	0
Condition	Very Good
Basement Grade	
1st Floor	910
1/2 Floor	260
2nd Floor	0
Upper Floor	0

Finished Basement	0
Total Finished Area	1,170
Total Basement	0
Basement Garage	0
Unfinished 1/2	0
Unfinished Full	0
AGLA	1,170
Attached Garage	0
Bedrooms	3
Full Baths	1
3/4 Baths	0
1/2 Baths	0
Heat Source	Oil
Heat System	Forced Air
Deck Area SqFt	540
Open Porch SqFt	0
Enclosed Porch SqFt	0
Brick/Stone	0
Fireplace Single Story	0
Fireplace Multi Story	0
Fireplace Free Standing	1
Fireplace Additional	0
AddnlCost	0
Obsolescence	0
Net Condition	0
Percentage Complete	0
Daylight Basement	
View Utilization	

Floor plan of Building 1



Accessory Of Building Number: 1

Accessory Type	Picture	Description	SqFt	Grade	Eff Year	%	Value	Date Valued
PRK:DET GAR			410	6 Low Average	1988			

TAX ROLL HISTORY

Account	Valued Year	Tax Year	Omit Year	Levy Code	Appraised Land Value (\$)	Appraised Imps Value (\$)	Appraised Total Value (\$)	Now Dollars (\$)	Taxable Land Value (\$)	Taxable Imps Value (\$)	Taxable Total Value (\$)	Tax Value Reason
277060165507	2017	2018		0010	375,000	198,000	573,000	0	375,000	198,000	573,000	
277060165507	2016	2017		0010	342,000	180,000	522,000	0	342,000	180,000	522,000	
277060165507	2015	2016		0010	311,000	160,000	471,000	0	311,000	160,000	471,000	
277060165507	2014	2015		0010	266,000	138,000	404,000	0	266,000	138,000	404,000	
277060165507	2013	2014		0010	257,000	110,000	367,000	0	257,000	110,000	367,000	
277060165507	2012	2013		0010	234,000	74,000	308,000	0	234,000	74,000	308,000	
277060165507	2011	2012		0010	394,000	2,000	396,000	0	394,000	2,000	396,000	
277060165507	2010	2011		0010	405,000	2,000	407,000	0	405,000	2,000	407,000	
277060165507	2009	2010		0010	405,000	15,000	420,000	0	405,000	15,000	420,000	
277060165507	2008	2009		0010	436,000	73,000	509,000	0	436,000	73,000	509,000	
277060165507	2007	2008		0010	399,000	66,000	465,000	0	399,000	66,000	465,000	
277060165507	2006	2007		0010	363,000	36,000	399,000	0	363,000	36,000	399,000	
277060165507	2005	2006		0010	126,000	164,000	290,000	0	126,000	164,000	290,000	
277060165507	2004	2005		0010	117,000	151,000	268,000	0	117,000	151,000	268,000	
277060165507	2003	2004		0010	113,000	145,000	258,000	0	113,000	145,000	258,000	
277060165507	2002	2003		0010	107,000	136,000	243,000	0	107,000	136,000	243,000	
277060165507	2001	2002		0010	98,000	135,000	233,000	0	98,000	135,000	233,000	
277060165507	2000	2001		0010	89,000	110,000	199,000	0	89,000	110,000	199,000	
277060165507	1999	2000		0010	97,000	81,000	178,000	0	97,000	81,000	178,000	
277060165507	1998	1999		0010	89,000	59,000	148,000	0	89,000	59,000	148,000	
277060165507	1997	1998		0010	0	0	0	0	77,000	51,000	128,000	
277060165507	1996	1997		0010	0	0	0	0	70,000	47,700	117,700	
277060165507	1994	1995		0010	0	0	0	0	70,000	47,700	117,700	
277060165507	1992	1993		0010	0	0	0	0	66,900	45,200	112,100	
277060165507	1990	1991		0010	0	0	0	0	59,200	40,000	99,200	
277060165507	1988	1989		0010	0	0	0	0	35,000	29,800	64,800	
277060165507	1986	1987		0010	0	0	0	0	46,000	31,500	77,500	
277060165507	1984	1985		0010	0	0	0	0	37,000	21,700	58,700	
277060165507	1982	1983		0010	0	0	0	0	37,000	17,800	54,800	

SALES HISTORY

Excise Number	Recording Number	Document Date	Sale Price	Seller Name	Buyer Name	Instrument	Sale Reason
2735288	20150608001128	5/28/2015	\$0.00	DUGUERRE DEBRA A	WOOD DEBRA A	Quit Claim Deed	Other
1524335	199701171161	1/16/1997	\$147,000.00	PALMER MARK R+KALONI H	WOOD WILLIAM J+DEBRA A DUGUERRE	Statutory Warranty Deed	None
1524336	199701171162	12/10/1996	\$0.00	DUGUERRE DAVID D	DUGUERRE DEBRA A	Quit Claim Deed	Property Settlement

REVIEW HISTORY

EXHIBIT C

Gonzalez, Kyna D.

From: Joseph.Hurley@seattle.gov
Sent: Thursday, April 05, 2018 5:11 PM
To: dmoehring@consultant.com; Gribben, Brandon S.
Cc: Waldman, Cheryl; Mills, William
Subject: MUP-18-001 (P)
Attachments: plat_sub_map.pdf; S_95_004.pdf; Plan SetV3.pdf; Exclusive_Definition.pdf; Land Use Forum minutes.pdf; Decision_Recommendation.pdf; MUP-18-001 Final_Exhibitlist.pdf; MUP-18-001 cert of service .pdf

Please find attached:
SDCI witness and exhibit list and copies of the exhibits, Certificate of service

Joseph Hurley
Senior Land Use Planner, SDCI
Joseph.Hurley@seattle.gov
206/684.8278



City of Seattle
700 5th Ave, Suite 1900
Seattle, WA 98124-4019

As stewards and regulators of land and buildings, we preserve and enhance the equity, livability, safety and health in our communities.