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

JOSEPH J. KIRBY and DEBORAH A.
KIRBY, husband and wife,

Plaintiffs,

v.

THE CITY OF TACOMA, a municipal
corporation; RAY CORPUZ and "JANE
DOE" CORPUZ, husband and wife;
PHILIP ARREOLA and "JANE DOE"
ARREOLA, husband and wife; WILLIAM
WOODARD and CATHERINE
WOODARD, husband and wife;
RAYMOND ROBERTS and "JANE DOE"
ROBERTS, husband and wife; DAVID
BRAME and "JANE DOE" BRAME,
husband and wife; and JAMES
HAIRSTON and "JANE DOE"
HAIRSTON, husband and wife,

Defendants.

No. 99-2-13911-4

DEFENDANTS' MOTION FOR
PARTIAL SUMMARY JUDGMENT
TO DISMISS PLAINTIFF'S AGE
DISCRIMINATION CLAIM

NOTED FOR:
December 13, 2002

ASSIGNED: ✓
Judge Katherine M. Stolz

DEFENDANTS' MOTION FOR PARTIAL
SUMMARY JUDGMENT TO DISMISS
PLAINTIFF'S AGE DISCRIMINATION CLAIM - 1

ORIGINAL


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COMES NOW the defendant, by and through their undersigned attorneys, and move this Court pursuant to Civil Rule 56 and PCLR 56 for summary judgment. This motion is based on the accompanying Memorandum, Affidavit of Shelley M. Kerlake, and the records and pleadings on file in this matter.

DATED this 13 day of November, 2002.

ROBIN S. JENKINSON, City Attorney
ELIZABETH A. PAULI, Ch. Asst. City Atty.

By: 
SHELLEY M. KERSLAKE
WSBA# 21820
Assistant City Attorney
Attorney for Defendants