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PIERCE COUNTY WASHINGTON
BOB SANSONE, COUNTY CLERK
BY _____ DEPUTY

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 PHILIP ARREOLA,
DAVID BRAME AND RAYMOND
ROBERTS

NOTED FOR:
December 13, 2002

ASSIGNED:
Judge Katherine M. Stolz

DEFENDANTS' MOTION FOR PARTIAL SUMMARY
JUDGMENT TO DISMISS PHILIP ARREOLA,
DAVID BRAME AND RAYMOND ROBERTS - 1

ORIGINAL

Tacoma City Attorney
Civil Division
747 Market Street, Room 1120
Tacoma, Washington 98402-3767
(253) 591-5885 / FAX 591-5755

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

7 DATED this 13 day of November, 2002.

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

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11 By: 

12 SHELLEY M. KERSLAKE
13 WSBA# 21820
14 Assistant City Attorney
15 Attorney for Defendants
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