



99-2-13911-4 17676187 MTSMJG 12-04-02

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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,

No. 99-2-13911-4

Plaintiffs,

DEFENDANTS' MOTION FOR  
SUMMARY JUDGMENT  
REGARDING PLAINTIFF'S CLAIM  
OF INTENTIONAL INFLICTION OF  
EMOTIONAL DISTRESS

v.

NOTED FOR:  
January 3, 2003

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,

ASSIGNED:  
Judge Katherine M. Stolz

Defendants.

COMES NOW the defendant, by and through their undersigned  
attorneys, and move this Court pursuant to Civil Rule 56 and PCLR 56 for

**ORIGINAL**


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Civil Division  
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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 3 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