

**UNITED STATES DISTRICT COURT**

**WESTERN DISTRICT OF WASHINGTON, AT TACOMA**

EMPLOYEE PAINTERS' TRUST HEALTH  
& WELFARE FUND; WESTERN  
WASHINGTON PAINTERS DEFINED  
CONTRIBUTION PENSION TRUST;  
DISTRICT COUNCIL NO. 5  
APPRENTICESHIP AND TRAINING TRUST  
FUND; WESTERN WASHINGTON  
PAINTERS LABOR MANAGEMENT  
COOPERATION TRUST; INTERNATIONAL  
UNION OF PAINTERS AND ALLIED  
TRADES INDUSTRY PENSION FUND; and  
INTERNATIONAL UNION OF PAINTERS  
AND ALLIED TRADES DISTRICT  
COUNCIL NO. 5

Plaintiffs / Judgment Creditors,

v.

STEVEN RAY FREEMIRE and JOAN  
MARIE FREEMIRE, husband and wife and the  
marital community comprised thereof; and  
PICTURE PERFECT PAINTING, INC., a  
Washington corporation,

Defendants / Judgment Debtors,

and

CORTINAS PAINTING AND  
RESTORATION, INC.,

Garnishee.

Case No.: MC13-5037BHS

RENEWED WRIT OF GARNISHMENT FOR  
CONTINUING LIEN ON EARNINGS

(Steven Freemire)

Renewed Writ of Garnishment for  
Continuing Lien on Earnings (Steven Freemire)  
(Case No. MC13-5037BHS)

**THE URBAN LAW FIRM**  
and  
**CHRISTENSEN JAMES & MARTIN**  
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*Counsel for Plaintiffs*

THE STATE OF WASHINGTON TO: Cortinas Painting and Restoration, Inc., Garnishee  
AND TO: Steven Ray Freemire, Defendant:

The above-named plaintiffs in this action have applied for a Renewed Writ of Garnishment against you, claiming that the above-named defendant is indebted to plaintiffs and that the amount to be held to satisfy the indebtedness is \$136,050.29\*, consisting of:

Balance on Judgment*		\$ 112,869.13
Interest on Judgment from 12/28/12 to 6/16/14		\$ 21,520.84
Taxable Costs and Attorneys' Fees:		\$ 1,317.78
Estimated Garnishment Costs		
Filing and Ex Parte Fees:	N/A	
Service and Affidavit Fees:	N/A	
Postage and Costs of Certified Mail:	\$ 22.54	
Answer Fee:	N/A	
Garnishment Attorney Fee:	\$ 250.00	\$ 272.54
Total:		\$ 135,980.29

Plus Per Day Rate of Estimated Interest: \$43.29  
Per day

THIS IS A WRIT FOR A CONTINUING LIEN. THE GARNISHEE SHALL HOLD the nonexempt portion of the defendant's earnings due at the time of service of this writ and shall also hold the defendant's nonexempt earnings that accrue through the last payroll period ending on or before SIXTY days after the date of service of this writ. HOWEVER, IF THE GARNISHEE IS PRESENTLY HOLDING THE NONEXEMPT PORTION OF THE DEFENDANT'S EARNINGS UNDER A PREVIOUSLY SERVED WRIT FOR A CONTINUING LIEN, THE GARNISHEE SHALL HOLD UNDER THIS WRIT only the defendant's nonexempt earnings that accrue from the date the previously served writ or writs terminate and through the last payroll period ending on or before sixty days after the date of termination of the previous writ or writs. IN EITHER CASE, THE GARNISHEE SHALL STOP WITHHOLDING WHEN THE SUM WITHHELD EQUALS THE AMOUNT STATED IN THIS WRIT OF GARNISHMENT.

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\* Payment in the amount of \$2,468.08 is currently pending and will be applied to the Balance on Judgment upon receipt and deposit.

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elj@cjmlv.com  
Counsel for Plaintiffs

1 YOU ARE HEREBY COMMANDED, unless otherwise directed by the court, by the attorney of record  
 2 for the plaintiff, or by this writ, not to pay any debt, whether earnings subject to this garnishment or any  
 3 other debt, owed to the defendant at the time this writ was served and not to deliver, sell, or transfer, or  
 4 recognize any sale or transfer of, any personal property or effects of the defendant in your possession or  
 control at the time when this writ was served. Any such payment, delivery, sale, or transfer is void to the  
 extent necessary to satisfy the plaintiff's claim and costs for this writ with interest.

5 YOU ARE FURTHER COMMANDED to answer this writ according to the instructions in this writ and  
 6 in the answer forms and, within twenty days after the service of the writ upon you, to mail or deliver the  
 7 original of such answer to the court, one copy to the plaintiff or the plaintiff's attorney, and one copy to  
 the defendant, at the addresses listed at the bottom of this writ.

8 If, at the time this writ was served, you owed the defendant any earnings (that is, wages, salary,  
 9 commission, bonus, tips, or other compensation for personal services or any periodic payments pursuant  
 10 to a nongovernmental pension or retirement program), the defendant is entitled to receive amounts that  
 11 are exempt from garnishment under federal and state law. You must pay the exempt amounts to the  
 12 defendant on the day you would customarily pay the compensation or other periodic payment. As more  
 13 fully explained in the answer, the basic exempt amount is the greater of seventy-five percent of  
 disposable earnings or a minimum amount determined by reference to the employee's pay period, to be  
 calculated as provided in the answer. However, if this writ carries a statement in the heading that "This  
 garnishment is based on a judgment or order for child support," the basic exempt amount is fifty percent  
 of disposable earnings.

14 YOU MAY DEDUCT A PROCESSING FEE FROM THE REMAINDER OF THE EMPLOYEE'S  
 15 EARNINGS AFTER WITHHOLDING UNDER THIS WRIT. THE PROCESSING FEE MAY NOT  
 16 EXCEED TWENTY DOLLARS FOR THE FIRST ANSWER AND TEN DOLLARS AT THE TIME  
 YOU SUBMIT THE SECOND ANSWER.

17 If you owe the defendant a debt payable in money in excess of the amount set forth in the first paragraph  
 18 of this writ, hold only the amount set forth in the first paragraph and any processing fee if one is charged  
 19 and release all additional funds or property to defendant.

20 IF YOU FAIL TO ANSWER THIS WRIT AS COMMANDED, A JUDGMENT MAY BE ENTERED  
 21 AGAINST YOU FOR THE FULL AMOUNT OF THE PLAINTIFF'S CLAIM AGAINST THE  
 22 DEFENDANT WITH ACCRUING INTEREST, ATTORNEY FEES, AND COSTS WHETHER OR  
 23 NOT YOU OWE ANYTHING TO THE DEFENDANT. IF YOU PROPERLY ANSWER THIS WRIT,  
 ANY JUDGMENT AGAINST YOU WILL NOT EXCEED THE AMOUNT OF ANY NONEXEMPT  
 DEBT OR THE VALUE OF ANY NONEXEMPT PROPERTY OR EFFECTS IN YOUR  
 POSSESSION OR CONTROL.

24 JUDGMENT MAY ALSO BE ENTERED AGAINST THE DEFENDANT FOR COSTS AND FEES  
 25 INCURRED BY THE PLAINTIFF.

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 elj@cjmlv.com  
 Counsel for Plaintiffs

Witness, the Honorable Benjamin H. Settle, Judge of the above-entitled court, and  
the seal thereof, on this 18th day of June, 2014.

/s/ Michael A. Urban

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Washington State Bar No. 20251  
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*Attorney for Plaintiffs*

WILLIAM M. McCOOL

Clerk of the Court

By: 

Address: \_\_\_\_\_



Name of Defendant: Steven Ray Freemire  
Address of Defendant: PO Box 1148  
Graham, WA 98338

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