

Honorable Benjamin H. Settle

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**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. 3:13-mc-5037-BHS

[Proposed]
JUDGMENT ON ANSWER OF GARNISHEE CORTINAS PAINTING AND RESTORATION, INC. AND ORDER TO PAY

(Steven Ray Freemire)

///

Proposed Judgment on Answer of Garnishee Cortinas Painting and Restoration, Inc. and Order to Pay (Steven Ray Freemire) (Case No. 3:13-mc-5037-BHS)

THE URBAN LAW FIRM
and
CHRISTENSEN JAMES & MARTIN
800 Bellevue Way NE, Suite 400
Bellevue, WA 98004
P. (425) 646-2394 / (702) 968-8087
F. (425) 462-5638 / (702) 968-8088
murban@theurbanlawfirm.com
Counsel for Plaintiffs

I. JUDGMENT SUMMARY

Judgment Creditors: 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

Garnishment Judgment Debtor (Garnishee): Cortinas Painting and Restoration, Inc.

Garnishment Judgment Amount: \$2,933.58

Costs Judgment Debtor (Defendant): Steven Ray Freemire

Costs Judgment Amount: \$270.07

Attorney for Judgment Creditor: Michael A. Urban, Esq., WA State Bar #20251
 Sean W. McDonald, Esq., WA State Bar #48542
 800 Bellevue Way NE, Suite 400
 Bellevue, WA 98004
 P. (425) 646-2394 / (702) 968-8087
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 E-mail: murban@theurbanlawfirm.com
 smcdonald@theurbanlawfirm.com

II. BASIS

IT APPEARING THAT Garnishee Cortinas Painting and Restoration, Inc. was indebted to Defendant Steven Ray Freemire in the non-exempt amount of \$2,933.58; that at the time the Writ of Garnishment was issued defendant was employed by or maintained a financial institution account with garnishee, or garnishee had in its possession or control funds, personal property, or effects of defendant; and that plaintiff has incurred recoverable costs and attorney fees of \$270.07; now, therefore, it is hereby

III. ORDER

ORDERED as follows:

Proposed Judgment on Answer of Garnishee
 Cortinas Painting and Restoration, Inc. and Order
 to Pay (Steven Ray Freemire)
 (Case No. 3:13-mc-5037-BHS)

THE URBAN LAW FIRM
 and
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 murban@theurbanlawfirm.com
 Counsel for Plaintiffs

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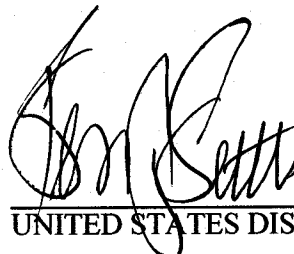
1. The Plaintiffs are awarded judgment against Garnishee Cortinas Painting and Restoration, Inc. in the amount of \$2,933.58;

2. The Plaintiffs are awarded judgment against Defendant in the amount of \$270.07 for recoverable costs, as stated on the writ of garnishment and return of service; and

3. Garnishee Cortinas Painting and Restoration, Inc. shall pay its judgment to the Plaintiffs' attorney through the registry of the Court and the Clerk of Court shall note receipt thereof and forthwith disburse such payment to Plaintiffs' attorney.

Garnishee is advised that failure to pay this judgment amount may result in execution of the judgment against it, including garnishment.

Dated this 11 of February, 2015.


UNITED STATES DISTRICT JUDGE

Submitted by:

THE URBAN LAW FIRM

/s/ Sean W. McDonald
Michael A. Urban, Esq., WA State Bar #20251
Sean W. McDonald, Esq., WA State Bar #48542
800 Bellevue Way NE, Suite 400
Bellevue, WA 98004
P. (425) 646-2394 / (702) 968-8087
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E-mail: murban@theurbanlawfirm.com
Attorney for Plaintiffs / Judgment Creditors

Proposed Judgment on Answer of Garnishee Cortinas Painting and Restoration, Inc. and Order to Pay (Steven Ray Freemire) (Case No. 3:13-mc-5037-BHS)

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murban@theurbanlawfirm.com
Counsel for Plaintiffs

EXHIBIT A

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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

CERTIFICATE OF MAILING

(Garnishment, Continuing Lien
on Earnings of Steven Freemire)

///

Certificate of Mailing (Garnishment, Continuing
Lien on Earnings of Steven Freemire)
(Case No. MC13-5037BHS)

THE URBAN LAW FIRM
and
CHRISTENSEN JAMES & MARTIN
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murban@theurbanlawfirm.com
elj@ejmlv.com
Counsel for Plaintiffs

The undersigned STATES that:

1.1 I am a citizen of the State of Nevada, I am over the age of 18 years, and I am not a party to this action.

1.2 On November 25, 2014 at 2:45p.m. at Las Vegas, NV, I mailed to defendant Steven Ray Freemire at P.O. Box 1148 Graham, WA, 98338 by postage prepaid certified mail, return receipt requested or electronic return receipt delivery confirmation requested, the following document(s):

- Writ of Garnishment (Debts Other Than Earnings)
- Writ of Garnishment for Continuing Lien on Earnings
- Judgment Creditor's Writ Application
- Notice of Garnishment and of Your Rights
- Exemption Claim
- Notice to Defendant of Non-Responsive Exemption Claim
- Other: _____
- Other: _____

The return receipt (green card), or the certified envelope if unclaimed or undeliverable, or electronic return receipt delivery confirmation is attached to this certification.

1.3 On November 25, 2014 at 2:45p.m. at Las Vegas, NV I mailed to garnishee Cortinas Painting and Restoration, Inc., at 700 Yuma St., Milton, WA 98354, by postage prepaid certified mail, return receipt requested, or electronic return receipt delivery confirmation requested, the following document(s):

- For debts other than earnings:
 - Writ of Garnishment (Debts Other than Earnings); and
 - Answer to Writ of Garnishment (Debts other than Earnings); and
 - Check or money order made payable to the garnishee in the amount of \$20.00.
- For Continuing Lien on Earnings:
 - Writ of Garnishment for Continuing Lien on Earnings; and
 - First Answer to Writ of Garnishment for Continuing Lien on Earnings
 - Second Answer to Writ of Garnishment for Continuing Lien on Earnings
- Notice of Default Against Garnishee
- Other: _____
- Other: _____

Certificate of Mailing (Garnishment, Continuing Lien on Earnings of Steven Freemire) (Case No. MC13-5037BHS)

THE URBAN LAW FIRM and CHRISTENSEN JAMES & MARTIN 800 Bellevue Way NE, Suite 400 Bellevue, WA 98004 P. (425) 646-2394 / (702) 968-8087 F. (425) 462-5638 / (702) 968-8088 murban@theurbanlawfirm.com elj@cjmlv.com Counsel for Plaintiffs

1 The return receipt (green card), or the certified envelope if unclaimed or undeliverable, or electronic
2 return receipt delivery confirmation is attached to this certification.

3 I CERTIFY under penalty of perjury under the laws of the State of Washington that the foregoing is true
4 and correct.

5 Dated: December 15, 2014 at Las Vegas, Nevada.

6 Fees:

7 Service: \$0.00

Signature

8 Postage: \$ 13.59

Krista Taylor-Openbrier, Paralegal

9 Answer Fee: \$ 0.00

Name and Title

Total: \$ 13.59

Serving the writ of garnishment:

Service of the writ of garnishment (debts other than earnings) is invalid unless the writ is served with an answer form and a check or money order made payable to the garnishee in the amount of twenty dollars (\$20) for the answer fee.

Service of the writ of garnishment for continuing lien on earnings is invalid unless the writ is served with an answer form.

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Certificate of Mailing (Garnishment, Continuing
Lien on Earnings of Steven Freemire)
(Case No. MC13-5037BHS)

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and
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murban@theurbanlawfirm.com
elj@cjmiv.com
Counsel for Plaintiffs

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY
<ul style="list-style-type: none"> Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired. Print your name and address on the reverse so that we can return the card to you. Attach this card to the back of the mailpiece, or on the front if space permits. 	<p>A. Signature <input checked="" type="checkbox"/> Agent <input checked="" type="checkbox"/> Addressee</p> <p>B. Received by (Printed Name) <i>Willie Cortina</i></p> <p>C. Date of Delivery <i>12-2-14</i></p> <p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If YES, enter delivery address below:</p>
<p>1. Article Addressed to:</p> <p><i>Cortina's Painting and Restoration, Inc. 700 Yuma St. Milton, WA 98354</i></p>	<p>3. Service Type <input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail <input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.</p>
<p>2. Article Number (Transfer from service label)</p> <p><i>91 7199 9991 7033 1405 7417</i></p>	<p>4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes</p>
PS Form 3811, February 2004 Domestic Return Receipt 102595-02-M-1540	

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY
<ul style="list-style-type: none"> Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired. Print your name and address on the reverse so that we can return the card to you. Attach this card to the back of the mailpiece, or on the front if space permits. 	<p>A. Signature <input checked="" type="checkbox"/> Agent <input checked="" type="checkbox"/> Addressee</p> <p>B. Received by (Printed Name) <i>Joan M</i></p> <p>C. Date of Delivery <i>12-10-14</i></p> <p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If YES, enter delivery address below:</p>
<p>1. Article Addressed to:</p> <p><i>Steven Ray Franwire P.O. Box 1148 Graham, WA 98338</i></p>	<p>3. Service Type <input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail <input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.</p>
<p>2. Article Number (Transfer from service label)</p> <p><i>91 7199 9991 7033 1405 7488</i></p>	<p>4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes</p>
PS Form 3811, February 2004 Domestic Return Receipt 102595-02-M-1540	

EXHIBIT B

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WESTERN DISTRICT OF WASHINGTON AT TACOMA
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**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

FIRST ANSWER TO WRIT OF GARNISHMENT FOR CONTINUING LIEN ON EARNINGS

(Steven Freemire)



13-MC-05037-ANS

**THE URBAN LAW FIRM
and
CHRISTENSEN JAMES & MARTIN
800 Bellevue Way NE, Suite 400
Bellevue, WA 98004
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murban@theurbanlawfirm.com
clj@cjmrv.com
Counsel for Plaintiffs**

1 **SECTION I.** If you are withholding the defendant's nonexempt earnings under a previously served writ
2 for a continuing lien, answer only sections I and III of this form and mail or deliver the forms as directed
3 in the writ. Withhold from the defendant's future nonexempt earnings as directed in the writ, and a
4 second set of answer forms will be forwarded to you later.

5 If you are NOT withholding the defendant's earnings under a previously served writ for a
6 continuing lien, answer this ENTIRE form and mail or deliver the forms as directed in the writ. A
7 second set of answer forms will be forwarded to you later for subsequently withheld earnings.

8
9 **ANSWER:** I am presently holding the defendant's nonexempt earnings under a previous writ served on
10 _____ (date) that will terminate not later than _____ (date).

11 On the date the writ of garnishment was issued as indicated by the date appearing on the last page of the
12 writ:

13 (A) The defendant: (check one) was, [] was not employed by garnishee. If not employed and you
14 have no possession or control of any funds of defendant, indicate the last day of
15 employment: _____; and complete section III of this answer and mail or deliver
16 the forms as directed in the writ;

17 (B) The defendant: (check one) [] did, did not maintain a financial account with garnishee; and

18 (C) The garnishee: (check one) [] did, did not have possession of or control over any funds,
19 personal property, or effects of the defendant. (List all of defendant's personal property or effects in
20 your possession or control on the last page of this answer form or attach a schedule if necessary.)

21 **SECTION II.** At the time of service of the writ of garnishment on the garnishee there was due and
22 owing from the garnishee to the above-named defendant \$ 0.

23 This writ attaches a maximum of twenty-five percent (25%) of the defendant's disposable
24 earnings (that is, compensation payable for personal services, whether called wages, salary, commission,
25

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

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murban@theurbanlawfirm.com
elj@cjmiv.com
Counsel for Plaintiffs

1 bonus, or otherwise, and including periodic payments pursuant to a nongovernmental pension or
2 retirement program). Calculate the attachable amount as follows:

3 Gross Earnings \$ 1200.00 (1)

4 Less deductions required by law
5 (social security, federal withholding tax, etc.
6 Do not include deductions for child support orders
7 or government liens here. Deduct child support orders
8 and liens on line 7): \$ 198.77 (2)

7 Disposable Earnings
8 (subtract line 2 from line 1): \$ 1001.23 (3)

9 Enter seventy-five percent (75%) of line 3: \$ 750.93 (4)

10 Enter one of the following exempt amounts*:
11 If paid Weekly \$253.75 Semi-monthly \$507.50
12 Bi-Weekly \$507.50 Monthly \$1,015.00
13 *These are minimum exempt amounts that the defendant must
14 be paid. If your answer covers more than one pay period,
15 multiply the preceding amount by the number of pay periods
16 and/or fraction thereof your answer covers. If you use a pay
17 period not shown, prorate the monthly exempt amount.

14 Subtract the larger of lines 4 and 5 from line 3: \$ 250.30 (6)

15 Enter amount (if any) withheld for ongoing
16 government liens such as child support: \$ 0 (7)

17 Subtract line 7 from line 6. This amount
18 must be held out for the plaintiff: \$ 250.30 (8)

19 This is the formula that you will use for withholding each pay period over the required sixty day
20 garnishment period. Deduct any allowable processing fee you may charge from the amount that is to be
21 paid to the defendant.

22 If there is any uncertainty about your answer, give an explanation on the last page or on an attached
23 page.

24
25

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

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murban@theurbanlawfirm.com
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Counsel for Plaintiffs

EXHIBIT C

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WESTERN DISTRICT OF WASHINGTON AT TACOMA
BY _____ DEPUTY

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

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Defendants / Judgment Debtors,

and

CORTINAS PAINTING AND RESTORATION, INC.,

Garnishee.

Case No.: MC13-5037BHS

SECOND ANSWER TO RENEWED WRIT OF GARNISHMENT FOR CONTINUING LIEN ON EARNINGS

(Steven Freemire)

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

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Counsel for Plaintiff

1 SECTION I. ANSWER SECTION II OF THIS FORM WITH RESPECT TO THE TOTAL AMOUNT
2 OF EARNINGS WITHHELD UNDER THIS GARNISHMENT, INCLUDING THE AMOUNT, IF
3 ANY, STATED IN YOUR FIRST ANSWER, AND WITHIN TWENTY DAYS AFTER YOU
4 RECEIVE THESE FORMS, MAIL OR DELIVER THEM AS DIRECTED IN THE WRIT.

5 Nonexempt amount due and owing stated in the first answer \$ 0
6 Nonexempt amount accrued since the first answer \$ 2933.58
7 TOTAL AMOUNT WITHHELD \$ 2933.58

8 SECTION II. At the time of service of the writ of garnishment on the garnishee there was due and
9 owing from the garnishee to the above-named defendant \$ 0.

10 This writ attaches a maximum of twenty-five percent (25%) of the defendant's disposable
11 earnings (that is, compensation payable for personal services, whether called wages, salary, commission,
12 bonus, or otherwise, and including periodic payments pursuant to a nongovernmental pension or
13 retirement program). Calculate the attachable amount as follows:

14 Gross Earnings \$ 1200.00 (1)

15 Less deductions required by law
16 (social security, federal withholding tax, etc.
17 Do not include deductions for child support orders
18 or government liens here. Deduct child support orders
19 and liens on line 7): \$ 198.08 (2)

18 Disposable Earnings
19 (subtract line 2 from line 1): \$ 1001.92 (3)

20 Enter seventy-five percent (75%) of line 3: \$ 751.44 (4)

21 Enter one of the following exempt amounts*: \$ 253.75 (5)

If paid Weekly \$253.75 Semi-monthly \$507.50
22 Bi-Weekly \$507.50 Monthly \$1,015.00

23 *These are minimum exempt amounts that the defendant must
24 be paid. If your answer covers more than one pay period,
25 multiply the preceding amount by the number of pay periods
and/or fraction thereof your answer covers. If you use a pay
period not shown, prorate the monthly exempt amount.

25 Subtract the larger of lines 4 and 5 from line 3: \$ 250.48 (6)

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

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and
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murban@theurbanlawfirm.com
elj@cjmlv.com
Counsel for Plaintiffs

1 Enter amount (if any) withheld for ongoing
2 government liens such as child support: \$ 0 (7)
3 Subtract line 7 from line 6. This amount
4 must be held out for the plaintiff: \$ 250.48 (8)

5 This is the formula that you will use for withholding each pay period over the required sixty day
6 garnishment period. Deduct any allowable processing fee you may charge from the amount that is to be
7 paid to the defendant.

8 If there is any uncertainty about your answer, give an explanation on the last page or on an attached
9 page.

10 **SECTION III. An attorney may answer for the garnishee.**

11 Under penalty of perjury, I affirm that I have examined this answer, including accompanying schedules,
12 and to the best of my knowledge and belief it is true, correct, and complete.

13
14 _____ 1/28/15
Signature of Garnishee Defendant Date

15
16 [Signature] Office Manager
17 Signature of Person Answering for Garnishee Connection with Garnishee

18 Tessie J. Cruz 700 Yuma St. Milton, WA 98354
19 Print Name of Person Signing Address of Garnishee

20
21 If necessary, use this space to supplement your answer from the first and second pages:
22 _____
23 _____
24 _____
25 _____

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

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Council for Plaintiffs

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Second Answer to Renewed Writ of Garnishment
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Counsel for Plaintiffs