

Honorable Karen L. Strombom

**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.

Case No.: 3:14-mc-05019-KLS

ORDER FOR JUDGMENT DEBTOR EXAMINATION OF STEVEN RAY FREEMIRE, INDIVIDUALLY AND AS PRESIDENT OF PICTURE PERFECT PAINTING, INC.

Having considered Plaintiffs' Motion for Judgment Debtor Examination of Steven Ray Freemire, on behalf of himself and the martial community with his wife, Joan Marie Freemire, and as President of Picture Perfect Painting, Inc., and the Declaration of Michael A. Urban, and good cause appearing,

Order for Judgment Debtor Exam of Steven Ray Freemire, et al. (Case No.: 3:14-mc-05019-KLS)

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

1 IT IS HEREBY ORDERED that Steven Ray Freemire, on behalf of himself and the marital  
2 community with his wife, Joan Marie Freemire, and as President of Picture Perfect Painting, Inc.,  
3 Defendants/Judgment Debtors, appear in Courtroom F, at the United States District Court for the  
4 Western District of Washington, located at 1717 Pacific Avenue, Tacoma, WA 98402-3200, on the 17<sup>th</sup>  
5 day of November, 2014, at 10:00 a.m., to be sworn in for a Judgment Debtor Examination and answer  
6 concerning property subject to the ownership and control of himself and Joan Marie Freemire, husband  
7 and wife, and Picture Perfect Painting, Inc.

8 IT IS FURTHER ORDERED that Steven Ray Freemire, on behalf of himself and the marital  
9 community with his wife, Joan Marie Freemire (“Debtor”) and as President of Picture Perfect Painting,  
10 Inc. (“Debtor Company”), no later than seven days prior to the examination set above, produce to The  
11 Urban Law Firm, 4270 S. Decatur Blvd., Ste. A-9, Las Vegas, NV 89103 or such other location as the  
12 parties may agree, the following documents under their control or under the control of their agents,  
13 attorneys, or accountants:

14 1. All financial statements prepared by or on behalf of Debtor and Debtor Company from  
15 June 1, 2013, to the present.

16 2. All original monthly bank statements of Debtor and Debtor Company from June 1, 2013,  
17 to the present.

18 3. All original savings account pass books, certificates of deposit, and trust certificates in  
19 the name of Debtor and Debtor Company from June 1, 2013, to the present.

20 4. All original negotiable instruments and negotiable securities in the name of Debtor and  
21 Debtor Company from June 1, 2013, to the present.

22 5. All evidence or other memoranda of any ownership interest of Debtor and Debtor  
23 Company in any other corporation, partnership, unincorporated association, or any business organized or  
24 conducted for the production of income from June 1, 2013, to the present.

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1           6.       All evidence or other memoranda of any income received by Debtor and Debtor  
2 Company from June 1, 2013, to the present, including without limitation tax returns, insurance proceeds,  
3 or repayment of loans.

4           7.       All evidence or other memoranda of any employer or place of work or employment of  
5 Debtor and Debtor Company from June 1, 2013, to the present, including without limitation contracts,  
6 invoices, billings, vouchers, or payments.

7           8.       All evidence of any ownership interest of Debtor and Debtor Company, including  
8 without limitation bills of sale, pink slips, or any other record or title, in any motor vehicle, airplane,  
9 boat, equipment, or machinery, from June 1, 2013, to the present.

10          9.       All evidence of any debts or repayments owed by Debtor and Debtor Company, including  
11 without limitation those arising from loans or judgments from June 1, 2013, to the present.

12          10.      Any and all evidence or other memoranda indicating that Debtor and Debtor Company  
13 was either a plaintiff or a defendant in any lawsuit from June 1, 2013, to the present.

14          11.      Any and all evidence or memoranda indicating that Debtor and Debtor Company  
15 received any judgment, award, bequest, or devise in any lawsuit or other court action from June 1, 2013,  
16 to the present.

17          12.      Any and all evidence or memoranda indicating any ownership interest of Debtor and  
18 Debtor Company in any patent, invention, trade name, or copyright.

19          13.      Any and all evidence or memoranda indicating an ownership interest of Debtor and  
20 Debtor Company in any real property or developments on real property.

21          14.      Any and all evidence of the sale(s) of any real or personal property of Debtor and Debtor  
22 Company from June 1, 2013, to the present.

23          15.      Any and all loan applications filled out by Debtor and Debtor Company since June 1,  
24 2013.

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1           16.     Copies of all documents evidencing the sale or transfer of any assets of Debtor and  
2 Debtor Company from June 1, 2013, to the present.

3           17.     Any and all documents evidencing any federal or state tax liability of Debtor and Debtor  
4 Company.

5           18.     All accounts receivable of Debtor and Debtor Company from June 1, 2013, to the  
6 present.

7           19.     Original cash disbursement journals and check registers maintained in connection with  
8 any business of Debtor and Debtor Company from June 1, 2013, to the present.

9           20.     Federal income tax returns of Debtor and Debtor Company for the years 2012 and 2013.

10          21.     All payroll records and time cards of Debtor Company from June 1, 2013, to the present.

11          22.     All accounts receivable of Debtor Company from June 1, 2013, to the present.

12          23.     All daily job logs, diaries, or foreman reports of Debtor Company from June 1, 2013, to  
13 the present.

14          24.     All daily job tickets or invoices of Debtor Company from June 1, 2013, to the present.

15          25.     All daily job tickets or invoices of Debtor Company for work performed for Debtor  
16 Company from June 1, 2013, to the present.

17          26.     All canceled checks drawn on any account established in the name of Debtor and Debtor  
18 Company from June 1, 2013, to the present.

19           To the extent records responsive to the above items were already produced for the prior  
20 Judgment Debtor Examination held on June 3, 2013, Debtor's and Debtor Company's obligations to  
21 produce responsive records extends only to supplementing the prior responses with more current  
22 information.

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1 **NOTICE TO THE JUDGMENT DEBTOR**

2 **IF YOU FAIL TO APPEAR AT THE TIME AND PLACE SPECIFIED IN THIS ORDER,**  
3 **YOU MAY BE SUBJECT TO ARREST AND PUNISHMENT FOR CONTEMPT OF COURT**  
4 **AND THE COURT MAY MAKE AN ORDER REQUIRING YOU TO PAY REASONABLE**  
5 **ATTORNEY'S FEES INCURRED BY THE JUDGMENT CREDITOR IN THIS PROCEEDING.**

6 DATED this 24<sup>th</sup> day of September, 2014.

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8 Karen L. Strombom  
9 United States Magistrate Judge

10  
11 Submitted by:

12 **THE URBAN LAW FIRM**

13  
14 /s/ Michael A. Urban

15 Michael A. Urban, Esq.  
16 Washington State Bar No. 20251  
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22 *Attorney for Plaintiffs / Judgment Creditors*

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