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CASE NUMBER: 12-2-21829-3 SEA

THE HONORABLE CAROL SCHAPIRA
MOTION NOTED WITHOUT ORAL ARGUMENT ON JULY 27, 2012

IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON
IN AND FOR THE COUNTY OF KING

GEOFF TATE and SUSAN TATE, a married
couple,

Plaintiffs,

v.

EDDIE JACKSON and TERESA GOLDEN-
JACKSON, a married couple; SCOTT
ROCKENFIELD and MISTY
ROCKENFIELD, a married couple;
MICHAEL WILTON and KERRIE LYNN
WILTON, a married couple; TRI-RYCHE,
CORPORATION, a Washington corporation;
QUEENSRYCHE MERCHANDISING, INC.,
a Washington corporation; and MELODISC
LTD., a Washington corporation,

Defendants.

Case No. 12-2-21829-3 SEA

REPLY MEMORANDUM IN FURTHER
SUPPORT OF MOTION FOR DEFAULT
AGAINST DEFENDANTS JACKSON,
GOLDEN-JACKSON, THE
ROCKENFIELDS, AND THE WILTONS

In their initial motion papers, plaintiffs Geoff and Susan Tate respectfully requested the
Court enter an Order of Default against Scott and Misty Rockenfield, Michael and Kerrie Lynn

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GOLDEN-JACKSON, THE ROCKENFIELDS,
AND THE WILTONS

1 Wilton, Eddie Jackson, and Teresa Golden-Jackson (collectively, the “Defendants”) because they
2 did not Answer the Complaint within twenty (20) days despite being informed that it was past
3 due.

4 The Tates sent the Defendants a letter on July 17 to inform them that the Answer was due
5 on July 16. The Tates received no response to this letter. On July 19, the Tates filed this Motion
6 for Default. The Defendants did not oppose the motion by filing a response. The Defendants
7 could have asked the Court for additional time to prepare and file the Answer, but they have not.
8 And, most importantly, the Defendants still have not filed and served an Answer.

9 Defendants chose to ignore the rules, reminders by the Tates, and a Motion for Default.
10 The Answer was due on July 16, 2012. Today is July 26, 2012. The Tates respectfully request
11 that the Court grant the Motion for Default and enter an Order of Default.

12 Dated this 26th day of July, 2012.

13 Respectfully submitted,

14 VERIS LAW GROUP PLLC

15 /s/ Denver R. Gant

16 Benjamin J. Stone, WSBA No. 33436
17 Joshua C. Brower, WSBA No. 25092
18 Denver R. Gant, WSBA No. 38552
19 Attorneys for Plaintiffs
20 Geoff Tate and Susan Tate

21 4811-4365-3392, v. 1
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AGAINST DEFENDANTS JACKSON,
GOLDEN-JACKSON, THE ROCKENFIELDS,
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