

FILED

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Snohomish County Superior Court
Sonya Kraski
County Clerk
Everett WA

10 AUG 24 AM 10: 02

10-2-07346-7



CL14333181

SONYA KRASKI
COUNTY CLERK
SNOHOMISH CO. WASH

Rcpt. Date
08/24/2010

Acct. Date
08/24/2010

Time
09:43 AM

Receipt/Item #
2010-01-17130/01
Cashier: SMN

Trans-Code
1100

Docket-Code
\$FFR

Paid By: DAVIS, LAW GROUP

SUPERIOR COURT OF WASHINGTON FOR SNOHOMISH COUNTY Court: \$230.00

AARON BOCK, as Personal Representative
of the ESTATE of KENNETH D. BOCK,
deceased,

Plaintiff,

vs.

KONRAD HASKINS and PHYLLIS
HASKINS, individually and the marital
community composed thereof,

Defendants.

NO. 10 2 07346 7

SUMMONS

[20 days]

To: Konrad Haskins and Phyllis Haskins
15465 - 166th Ave. SE
Monroe, WA 98272
(425) 280-3764

A lawsuit has been started against you in the above entitled court by the plaintiff.

Plaintiff's claims are stated in the written complaint, a copy of which is served upon you with
this summons.

In order to defend against this lawsuit, you must respond to the complaint by stating
your defense in writing, and by serving a copy upon the person signing this summons within 20
days after the service of this summons, excluding the day of service, or a default judgment may

SUMMONS
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ORIGINAL

DAVIS LAW GROUP, P.S.
2101 FOURTH AVENUE, SUITE 630
SEATTLE, WASHINGTON 98121
(206) 727-4000

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1 be entered against you without notice. A default judgment is one where the plaintiff is entitled
2 to what he/she asks for because you have not responded. If you serve a notice of appearance on
3 the undersigned person, you are entitled to notice before a default judgment may be entered.

4 You may demand that the plaintiff file this lawsuit with the court. If you do so, the
5 demand must be in writing and must be served upon the person signing this summons. Within
6 14 days after you served the demand, the plaintiff must file this lawsuit with the court, or the
7 service on you of this summons and complaint will be void.

8
9 If you wish to seek the advice of an attorney in this matter, you should do so promptly
10 so that your written response, if any, may be served on time.

11 This summons is issued pursuant to rule 4 of the Superior Court Civil Rules of the
12 State of Washington.
13

14
15 Dated this 16th day of August, 2010.

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17 **DAVIS LAW GROUP, P.S.**

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20 By: Christopher M. Davis, WSBA No. 23234
21 Attorneys for Plaintiff
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SUPERIOR COURT OF WASHINGTON FOR SNOHOMISH COUNTY

AARON BOCK, as Personal Representative
of the ESTATE of KENNETH D. BOCK,
deceased,

NO. 10 2 07346 7

COMPLAINT FOR DAMAGES

Plaintiff,

vs.

KONRAD HASKINS and PHYLLIS
HASKINS, individually and the marital
community composed thereof,

Defendants.

COMES NOW the Plaintiff, by and through his attorney of record, and states and
alleges against the above-named Defendants as follows:

I. PARTIES & JURISDICTION

1.1 Plaintiff Aaron Bock is the Personal Representative of the Estate of Kenneth
D. Bock, deceased, by order of the court in King County Superior Court Cause No. 10-4-
03365-1 SEA. Plaintiff Bock brings this cause of action on behalf of the Estate and the
Estate's beneficiaries for the wrongful death of Kenneth D. Bock pursuant to RCW 4.20 *et*
seq.

ORIGINAL

1 IV. SECOND CAUSE OF ACTION

2 COMMON LAW STRICT LIABILITY

3 4.1 Plaintiff re-alleges the allegations set forth in paragraphs 1.1 through 3.2, and
4 incorporates them as fully set forth herein.

5 4.2 The defendants had prior knowledge, or constructive knowledge, that their
6 dog Buddy had vicious and/or dangerous propensities that were likely to lead to injuries
7 inflicted upon another human being, including the injury or bite that Buddy inflicted upon
8 Kenneth D. Bock.

9 4.3 The defendants had prior knowledge that their dog Buddy had previously
10 bitten, injured or acted aggressively toward other human beings.

11 4.4 The defendants failed to adequately quarantine and/or confine their dog
12 Buddy before it bit and injured Kenneth D. Bock.

13 4.5 The defendants are therefore strictly liable for the injuries and damages
14 caused to the plaintiff and the decedent.

15 V. THIRD CAUSE OF ACTION

16 NEGLIGENCE

17 5.1 Plaintiff re-alleges the allegations set forth in paragraphs 1.1 through 4.5, and
18 incorporates them as fully set forth herein.

19 5.2 The Defendants owed Plaintiff and Kenneth D. Bock a duty of care and a duty
20 to act reasonably.

1 6.3 The defendants' dog, and their acts and/or omissions described herein, have
2 subjected the defendants to common law strict liability and negligence for the wrongful death
3 of Kenneth D. Bock.

4 6.4 As a proximate cause of the bite inflicted by the defendants' dog, and the
5 defendants' acts and/or omissions described herein, the defendants are liable to plaintiff,
6 Kenneth D. Bock and his estate, for all economic and non-economic damages, including those
7 allowed by RCW 4.20 *et seq.*, and which include without limitation, past and future medical
8 expense, funeral, and burial expenses, past and future lost income or earning capacity, loss of
9 consortium, emotional distress, grief, loss of enjoyment of life, inconvenience, mental anguish,
10 the destruction of the spousal and parent-child relationship, and conscious pain, suffering,
11 anxiety and fear of impending death experienced by the decedent in amounts to be proven at
12 trial.
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14

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16 WHEREFORE, Plaintiff prays for judgment against the Defendants, jointly and
17 severally, as follows:
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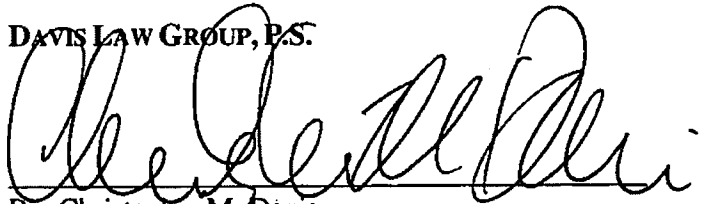
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20 1. For all damages sustained by the Estate and the Estate's beneficiaries in an
21 amount proven at trial, including past and future medical expense and other healthcare
22 expenses, lost wages, lost earning capacity, funeral and burial expense, pain and suffering, both
23 mental and physical, loss of enjoyment of life, disability, disfigurement, damage to property,
24 past and future special damages, loss of consortium, loss of relationship, and other damages;
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26 2. Interest calculated at the maximum amount allowable by law, including pre-
and post-judgment interest;

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- 3. A reasonable attorney's fee as allowed by law;
- 4. Costs and disbursements pursuant to statute; and
- 5. Other and further relief this Court may deem just and equitable.

DATED this 16 day of August, 2010.

DAVIS LAW GROUP, P.S.

By: Christopher M. Davis
WSBA No. 23234
Attorneys for Plaintiff