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MAR 10 2025

Timothy W. Fitzgerald  
SPOKANE COUNTY CLERK

(Copy Receipt)



**SUPERIOR COURT OF WASHINGTON  
COUNTY OF SPOKANE**

(Clerk's Date Stamp)

CITY OF SPOKANE VALLEY, a municipal corporation,

Plaintiff,

CASE NO. 25-2-00710-32

NOTE FOR HEARING  
ISSUE OF LAW

ALBERT W. MERKEL, an individual,

(NTMTDK)

v.  
Defendant.

**TO THE CLERK AND TO: All parties of record**

The undersigned has scheduled a **Motion for Order of Default**. The hearing is scheduled for **Friday, April 4, 2025** at **9:00 a.m.** before the assigned **Judge Rachelle Anderson** in the **Spokane County Superior Court, 1116 W Broadway Ave, Spokane, WA 99260**.

Motions must be confirmed **NO LATER THAN 12:00 NOON, 3 DAYS BEFORE THE HEARING** by contacting the judicial assistant for the assigned judge, or the presiding judge for cases that are not assigned.

Name: Reid G. Johnson; Michael J. Hines; Zaine M. Yzaguirre Bar ID: 44338; 19929; 58265

Address: Lukins & Annis, P.S., 717 W Sprague Ave., Ste. 1600 Telephone No: (509) 455-9555

City, State, Zip: Spokane WA 99201

Signed: A handwritten signature in black ink, appearing to read "Reid G. Johnson".

Date: March 10, 2025.

### **AUTHORITIES**

Cite those authorities which form primary basis for your legal position. Where case authority is cited, provide reference to specific page of opinion, which is controlling. Likewise reference applicable sections or subsection of statutes or court rules. This does not substitute for required Memorandum of Authorities.

Applicable Court Rule: See accompanying motion and affidavit.

Applicable Statute: \_\_\_\_\_

Applicable Case Law: \_\_\_\_\_

## CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 10<sup>th</sup> day of March, 2025, I caused to be served a true and correct copy of the foregoing by the method indicated below, and addressed to all entities as follows:

Patrick J. Kirby  
Patrick J. Kirby Law Office, PLLC  
4353 S. Greystone Lane  
Spokane, WA 99223  
pkirby@pkirbylaw.com

- U.S. Mail
- Hand Delivered
- Overnight Mail
- Via E-Filing
- Via Email

*Attorney for Defendant*

LUKINS & ANNIS, P.S.

  
FIONA SPRING, Legal Assistant