

Appellant's Exhibit 22

(as referenced in June 30, 2017

*Appellant WPDC Cleveland LLC's Witness and Exhibit List*)

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FILED  
09 JAN 20 PM 2:54  
KING COUNTY  
SUPERIOR COURT CLERK  
SEATTLE, WA

JEFFREY M. RAMSDALL

SUPERIOR COURT OF WASHINGTON FOR KING COUNTY

RAIN CITY DEVELOPMENT, LLC, a  
Washington limited liability company,

09 NO.2 - 03962 - 3 SEA

Plaintiff,

SUMMONS

vs.

SHILLA INCORPORATED, a Washington  
corporation, PACIFIC UNION BANK, HANMI  
BANK,

Defendant.

TO THE DEFENDANTS:

A lawsuit has been started against you in the above-entitled court by plaintiff above named. Plaintiff claim is 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 serve a copy upon the person signing this summons within twenty (20) days after the service of this summons, excluding the day of service, or a default judgment may be entered against you without notice. A default judgment is one where plaintiff entitled to what ask for because you have not responded. If you serve a notice of appearance on the undersigned person, you are entitled to notice before a default judgment may be entered.

You may demand that the plaintiff file this lawsuit with the court. If you do so, the demand must be in writing and must be served upon the person signing this

SUMMONS - 1

ORIGINAL

Kulich, La Porte,  
West & Lockner, P.S.  
524 Tacoma Avenue South  
Tacoma, Washington 98402  
(253) 383-4704

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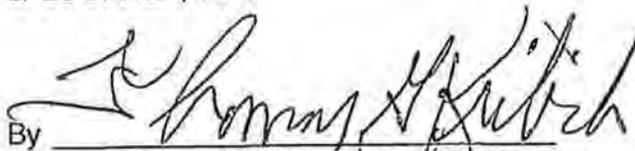
summons. Within fourteen (14) days after you serve the demand, the plaintiff must file this lawsuit with the court, or the service on you of this summons and complaint will be void.

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

This summons is issued pursuant to Rule 4 of the Superior Court Civil Rules of the state of Washington.

DATED this 5<sup>th</sup> day of January, 2008.

KRILICH, LA PORTE, WEST  
& LOCKNER, P.S.

By 

Thomas G. Krilich, WSBA #2973  
Attorney for Plaintiffs

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SUPERIOR COURT OF WASHINGTON FOR KING COUNTY

RAIN CITY DEVELOPMENT, LLC, a  
Washington limited liability company,

Plaintiff,

vs.

SHILLA INCORPORATED, a Washington  
corporation, PACIFIC UNION BANK, HANMI  
BANK,

Defendant.

NO 09-2-03962-3 SEA  
COMPLAINT TO QUIET TITLE BY  
ADVERSE POSSESSION

COMES NOW the plaintiff, and for cause of action against the defendant alleges  
as follows:

I.

Plaintiff Rain City Development, LLC is a Washington limited liability company  
having paid all licenses and fees due the state of Washington.

II.

Defendant Shilla Incorporated is a Washington corporation which does business  
in King County, Washington.

COMPLAINT TO QUIET TITLE BY  
ADVERSE POSSESSION - 1

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III.

Plaintiff is the legal owner and fee title holder of certain real property in King County legally described as:

The south 60 feet of Lot 1, Block 6, as measured along the westerly line of said lot, Town of Redmond, according to the plat thereof recorded in Volume 7 of plats, page 74, records of King County, Washington.

King County Tax Parcel No. 719880-0085-08.

IV.

Defendant Shilla Incorporated is the owner of property in King County legally described as:

Lots 1, 2, and 3, Block 6, Town of Redmond, according to the plat recorded in Volume 7 of plats, page 74, in King County, Washington, except the south 60 feet of Lot 1, records of King County, Washington.

King County Tax Parcel No. 719880-0086-07.

V.

Plaintiff's above described property is improved with a concrete commercial building which encroaches upon defendant's Lot 1 on the north and defendant's Lot 2 on the south. The said concrete building has encroached onto defendant's legally described property for more than 50 years.

VI.

The encroachment of said building has been open, notorious, and hostile.

VII.

Plaintiff is entitled to have title to the encroaching portion of the building quieted against the interest of defendant or anyone claiming by, through or under it.

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VIII.

Plaintiff is also entitled to have a reasonable area around the north and west side of the building, at least five (5) feet in width, for access for maintenance and repair of their building.

IX.

Defendant Pacific Union Bank has an interest in defendant's real property as a result of a deed of trust dated November 16, 2000 and recorded under King County Recording No. 20001127000101.

X.

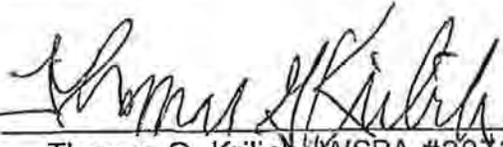
Defendant Hanmi Bank has an interest in defendant's real property as a result of a deed of trust dated August 6, 2004 and recorded September 2, 2004 under King County Recording No. 20040902000954.

WHEREFORE, plaintiff prays for judgment against defendant quieting title to that portion of Lots 1 and 2 of Block 6 upon which plaintiff's building encroaches against the interest of defendant, together with a reasonable area adjoining the building for access to the building for the purposes of maintenance and repair. Said judgment should be entered against the named defendant and anyone claiming by, through, or under it.

Plaintiff also prays for such costs and fees as are allowed by law.

DATED this 5<sup>th</sup> day of January, 2009.

KRILICH, LA PORTE, WEST & LOCKNER, P.S.

By   
Thomas G. Krilich, WSBA #2973  
Attorney for Plaintiffs