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The Honorable Judge McCullough

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

STEPHEN HAMMOND; WENDY BIRNBAUM;	)	
KENNETH MILLER; MILLER BUILDING	)	
ENTERPRISES, INC.; MILLER	)	NO. 11-2-22680-8 KNT
CONSTRUCTION COMPANY, INC.; MILMOR	)	
LUMBER MANUFACTURING, INC.; MICHAEL	)	
NYKREIM; and KIRKLAND BUILDERS	)	
GROUP, LLC; individually and on behalf of the	)	KING COUNTY'S ANSWER AND
class of all persons and entities similarly situated,	)	AFFIRMATIVE DEFENSES
	)	
..... Plaintiffs,	)	
	)	
v.	)	
	)	
KING COUNTY; KING CONSERVATION	)	
DISTRICT; PIERCE COUNTY; and PIERCE	)	
CONSERVATION DISTRICT,	)	
	)	
..... Defendants.	)	
	)	

Defendant King County (hereinafter "King County") in answer to Plaintiffs' Complaint ("Complaint"), admits, denies and states as follows:

1. With regard to the allegations contained in Paragraph 1 of the Complaint, King County states that to the extent that this paragraph alleges a legal conclusion or conclusions, it does not require a response. To the extent that Paragraph 1 contains factual allegations, King County admits only that it has imposed special assessments under the authority of RCW.

1 89.08.400. Article VII, Section 9 of the Washington Constitution as it relates to special  
2 assessments speaks for itself, and RCW 89.08.400 speaks for itself. All other or different  
3 allegations are denied.

4 2. With regard to the allegations contained in Paragraph 2 of the Complaint, to the  
5 extent that this paragraph alleges a legal conclusion or conclusions, it does not require a  
6 response. All other or different allegations are denied.

7 **I. PARTIES, JURISDICTION AND VENUE**

8 3. With regard to the allegations contained in Paragraph 3 of the Complaint, King  
9 County is without sufficient knowledge or information to form a belief as to the truth or falsity of  
10 the allegations contained therein and, therefore, denies the same.

11 4. With regard to the allegations contained in Paragraph 4 of the Complaint, King  
12 County is without sufficient knowledge or information to form a belief as to the truth or falsity of  
13 the allegations contained therein and, therefore, denies the same.

14 5. With regard to the allegations contained in Paragraph 5 of the Complaint, King  
15 County is without sufficient knowledge or information to form a belief as to the truth or falsity of  
16 the allegations contained therein and, therefore, denies the same.

17 6. With regard to the allegations contained in Paragraph 6 of the Complaint, King  
18 County is without sufficient knowledge or information to form a belief as to the truth or falsity of  
19 the allegations contained therein and, therefore, denies the same.

20 7. With regard to the allegations contained in Paragraph 7 of the Complaint, King  
21 County is without sufficient knowledge or information to form a belief as to the truth or falsity of  
22 the allegations contained therein and, therefore, denies the same.

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