

ELECTRONICALLY FILED
11/6/2023 11:31 AM
Heidi Percy
County Clerk
Snohomish County, WASH
Case Number: 23-2-08147-31

23-2-08147-31

RETURN OF SERVICE

**IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON
IN AND FOR THE COUNTY OF SNOHOMISH**

Case Number: _____ Court Date: 10/30/2023 5:00 pm

Plaintiff: **HEATHER RIDGE APARTMENTS,
LLC**

vs.

Defendant: **JOSHUA NUETEH BINDA**

Service Documents:
**EVICION SUMMONS & COMPLAINT
FOR UNLAWFUL DETAINER**

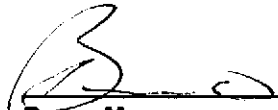
Received by PUCKETT & REDFORD PLLC on the 18th day of October, 2023 at 6:32 pm to be served on **JOSHUA NUETEH BINDA AT HEATHER RIDGE APARTMENTS, 20409 68TH AVENUE WEST, #H-302, LYNNWOOD, WA 98036.**

I, Bruce Munro, do hereby affirm that on the **21st day of October, 2023 at 10:40 am, I:**

personally delivered at the time and place set forth above, a true and correct copy of the **EVICION SUMMONS & COMPLAINT FOR UNLAWFUL DETAINER** leaving same with **JOSHUA NUETEH BINDA**.

Description of Person Served: Age: 20S, Sex: M, Race/Skin Color: AFR. AMERICAN, Height: 5'9", Weight: 170, Hair: BLACK, Glasses: N

I declare under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct. That I am a resident of Washington. I am a competent person 18 years of age or older and not a party to or attorney in this proceeding and am authorized to serve the process described herein. I certify that the person, firm, or corporation served is the identical one named in this action. I hereby declare that the above statement is true to the best of my knowledge and the belief, and that it is made for use as evidence in court and is subject to penalty for perjury.



Bruce Munro

KING 0108136, Place Signed

10-24-2023 (Bartlett)
Date

**PUCKETT & REDFORD PLLC
901 5TH AVE
SUITE 800
SEATTLE, WA 98164
(206) 386-4800**

Our Job Serial Number: GPT-2023017565
Ref: 54605.0009

ORIGINAL

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

HEATHER RIDGE APARTMENTS, LLC
Plaintiff,

vs.

JOSHUA NUETEH BINDA
Defendant(s).

54605.0009

NO.

EVICITION SUMMONS
(Residential)

THIS IS AN IMPORTANT LEGAL DOCUMENT TO EVICT YOU.
YOUR WRITTEN RESPONSE MUST BE RECEIVED BY:

5:00 P.M., on October 30, 2023

**TO: JOSHUA NUETEH BINDA
HEATHER RIDGE APARTMENTS
20409 68 TH AVENUE WEST, #H-302
LYNNWOOD, Washington 98036**

GET HELP: If you do not respond by the deadline above, you will lose your right to defend yourself or be represented by a lawyer if you cannot afford one in court and could be evicted. The court may be able to appoint a lawyer to represent you without cost to you if you are low-income and are unable to afford a lawyer. If you believe you are a qualifying low-income renter and would like an attorney appointed to represent you, please contact the Eviction Defense Screening Line at 855-657-8387 or apply online at <https://nwjustice.org/apply-online>. For additional resources, you may call 2-1-1 or the Northwest Justice Project CLEAR Hotline outside King County (888) 201-1014 weekdays between 9:15 a.m. – 12:15 p.m., or (888) 387-7111 for seniors (age 60 and over). You may find additional information to help you at <http://www.washingtonlawhelp.org>. Free or low-cost mediation services to assist in nonpayment of rent disputes before any judicial proceedings occur are also available at dispute resolution centers throughout the state. You can find your nearest dispute resolution center at <https://www.resolutionwa.org>.

1 **HOW TO RESPOND: Phone calls to your Landlord or your Landlord's lawyer are not**
2 **a response.** You may respond with a "notice of appearance.:" This is a letter that includes the
3 following:

- 4 (1) A statement that you are appearing in the court case
- 5 (2) Names of the Landlord(s) and the tenant(s) (as listed above)
- 6 (3) Your name, your address where legal documents may be sent, your signature, phone
7 number (if any), and case number (if the case is filed)

8 This case is/ is not filed with the court. If this case is filed, you need to also file your
9 response with the court by delivering a copy to the clerk of the court at:

10 Snohomish County Superior Court Clerk
11 3000 Rockefeller Avenue, M/S 605
12 Everett, WA 98201
13 Hours: 8:30 AM – 4:30 PM Monday through Friday

14 **WHERE TO RESPOND:** You must mail, fax, or hand deliver your response letter to your
15 Landlord's lawyer, or if no lawyer is named in the complaint, to your Landlord. If you mail the
16 response letter, you must do it 3 days before the deadline above. Request receipt of a proof of mailing
17 from the post office. If you hand deliver or fax it, you must do it by the deadline above. The address
18 is:

19 Puckett & Redford PLLC
20 901 5th Avenue, Suite 800
21 Seattle, WA 98164
22 Facsimile Number: 206-233-8166

23 **COURT DATE:** If you respond to this Summons, you will be notified of your hearing date
24 in a document called an "Order to Show Cause.:" This is usually mailed to you. **If you get notice of a**
25 **hearing, you must go to the hearing.** If you do not show up, your landlord can evict you. Your
26 landlord might also charge you more money. If you move before the court date, you must tell your
landlord or the landlord's attorney.

PUCKETT & REDFORD PLLC

DATED: October 17, 2023

By: /S/ Randy Redford
Randy Redford/WSBA No. 21529
Tom M. Morningstar//WSBA No. 44245
Attorneys for Plaintiff

30-DAY NOTICE TO PAY RENT OR VACATE THE PREMISES

TO: Joshua Nuetch Binda
AND TO:
ADDRESS: 20409 68th Ave West, unit H302, Lynnwood, WA 98036

You are receiving this notice because the landlord alleges you are not in compliance with the terms of the lease agreement by failing to pay rent and/or utilities and/or recurring or periodic charges that are past due.

(1) Monthly rent due for (list month(s)):

\$1,350.00 (September 2023)
\$1,350.00 (August 2023)
\$1,350.00 (July 2023)
\$1,350.00 (June 2023)
\$1,350.00 (May 2023)
\$969.41 (April 2023)

\$7,719.41

AND/OR

(2) Utilities due for (list month(s)):

\$68.00 (September 2023)
\$68.00 (August 2023)
\$68.00 (July 2023)
\$68.00 (June 2023)
\$68.00 (May 2023)
\$68.00 (April 2023)
\$68.00 (March 2023)
\$21.75 (February 2023)

\$497.75

AND/OR

(3) Other recurring or periodic charges identified in the lease for (list month(s)):

Pet Rent:
\$35.00 (September 2023)
\$35.00 (August 2023)
\$35.00 (July 2023)
\$35.00 (June 2023)
\$35.00 (May 2023)
\$35.00 (April 2023)

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

HEATHER RIDGE APARTMENTS, LLC
Plaintiff,

NO.

vs.

Declaration of Service of Notice

JOSHUA NUETEH BINDA
Defendant(s).

54605.0009

The undersigned, declares under penalty of perjury under the laws of the State of Washington, that the following is true and correct:

On the following date September 7, 2023, a notice to pay rent or vacate with local Resources (if any) was served upon the defendant(s) pursuant to R.C.W.59.12.040. A copy of said notices are attached and were delivered in the following manner:

___ Personally delivering _____ copy/copies to and leaving the same with the above-named defendant(s).

___ Personally delivering _____ copy/copies to a person of suitable age and discretion at the Tenant's Address, and mailing _____ copy/copies by regular mail, postage prepaid, addressed to the defendant(s) at the Tenant's Address.

After knocking and receiving no response, by tacking 1 copy/copies on the front door at the Tenant's Address and mailing 1 copy/copies by regular mail, postage prepaid, addressed to the defendant(s) at the Tenant's Address.

Tenant's Address: HEATHER RIDGE APARTMENTS, 20409 68 TH AVENUE WEST, #H-302,
LYNNWOOD, SNOHOMISH COUNTY, WASHINGTON.

DATED and SENT on 11/03/2023 (today's date) at Seattle (City), Washington. VIA FAX/EMAIL FOR FILING IN SNOHOMISH COUNTY SUPERIOR COURT.

Maria Y. Aguilar

Signature
Print Name Maria Aguilar

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

HEATHER RIDGE APARTMENTS, LLC
Plaintiff,

vs.

JOSHUA NUETEH BINDA
Defendant(s).

54605.0009

NO.

GR 17 DECLARATION OF COUNSEL

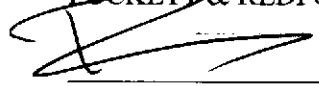
The undersigned declares under penalty of perjury under the laws of the State of Washington that the following is true and correct:

I am one of the attorneys for Plaintiff. I have examined the attached:

- Declaration of Service of Notice
- Declaration of Service of Payment Agreement
- Declaration of Emailing
- Declaration of Posting
- Declaration in Support of Judgment
- Declaration of Non-Military

which consists of 2 pages, including this Declaration, and it is legible and complete.

DATED: 11/6/23 at Seattle, WA.

PUCKETT & REDFORD PLLC

Randy Redford/WSBA No. 21529
Tom M. Morningstar/WSBA No. 44245
Attorneys for Plaintiff

\$210.00

TOTAL AMOUNT DUE:

\$8,427.16

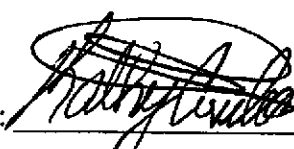
Note - payment must be made pursuant to the terms of the rental agreement or by nonelectronic means including but not limited to, cashier's check, money order, or other certified funds.

You must pay the total amount due to your landlord within thirty (30) days after service of this notice or you must vacate the premises. Any payment you make to the landlord must first be applied to the total amount due as shown on this notice. Any failure to comply with this notice within thirty (30) days after service of this notice may result in a judicial proceeding that leads to your eviction from the premises.

The Washington state Office of the Attorney General has this notice in multiple languages as well as information on available resources to help you pay your rent, including state and local rental assistance programs, on its web site at www.atg.wa.gov/landlord-tenant.

State law provides you the right to legal representation and the court may be able to appoint a lawyer to represent you without cost to you if you are a qualifying low-income renter. If you believe you are a qualifying low-income renter and would like an attorney appointed to represent you, please contact the Eviction Defense Screening Line at 855-657-8387 or apply online at <http://nwjustice.org/apply-online>. For additional resources, call 2-1-1 or the Northwest Justice Project CLEAR Hotline outside of King County (888) 201-1014 weekdays between 9:15 am – 12:15 pm, or (888) 387-7111 for seniors (age 60 and over). You may find additional information to help you at <http://www.washingtonlawhelp.org>. Free or low cost mediation services to assist in non-payment of rent disputes before any judicial proceedings occur are also available at dispute resolution centers throughout the state. You can find your nearest dispute resolution center at <https://www.resolutionwa.org>.

State law also provides you the right to receive interpreter services at court.

OWNER/LANDLORD:  DATE: September 7, 2023

WHERE TOTAL AMOUNT DUE IS TO BE PAID:
(owner/landlord name): Heather Ridge Apartments
(address): 20427 68th Ave West, Lynnwood, WA 98036

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7 IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON
IN AND FOR THE COUNTY OF SNOHOMISH

8 HEATHER RIDGE APARTMENTS, LLC
9 Plaintiff,

NO.

10 vs.

DECLARATION IN SUPPORT OF
JUDGMENT

11 JOSHUA NUETEH BINDA
12 Defendant(s).

54605.0009

13
14 The undersigned declares under penalty of perjury under the laws of the State of Washington
15 that the following is true and correct:

16 I am the agent for the Plaintiff in this action. I have reviewed the proposed Judgment and the
17 amounts owed on the principal judgment: \$10,300.45 by defendant(s) as set forth in that Judgment
18 are true and correct. The defendant(s) are still in possession of the premises. I also state that to my
19 knowledge and belief the defendant(s) is/are not a member/members of the armed forces nor
20 dependent(s) of a member of the armed forces.

21 DATED and SENT on **11/03/2023** at Seattle (City), Washington, VIA FAX
22 FOR FILING IN SNOHOMISH COUNTY SUPERIOR COURT.

23 *Marina Y. Aguirre*

24 Signature
25 Print Name

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

HEATHER RIDGE APARTMENTS, LLC
Plaintiff,

vs.

JOSHUA NUETEH BINDA
Defendant(s).

54605.0009

NO.

GR 17 DECLARATION OF COUNSEL


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I am one of the attorneys for Plaintiff. I have examined the attached:

- Declaration of Service of Notice
- Declaration of Service of Payment Agreement
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- Declaration of Non-Military

which consists of 2 pages, including this Declaration, and it is legible and complete.

DATED: 11/6/23 at Seattle, WA.

PUCKETT & REDFORD PLLC

Randy Redford/WSBA No. 21529
Tom M. Morningstar/WSBA No. 44245
Attorneys for Plaintiff

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

HEATHER RIDGE APARTMENTS, LLC
Plaintiff,

vs.

JOSHUA NUETEH BINDA
Defendant(s).

54605.0009

NO.

DECLARATION OF NON-MILITARY

The undersigned declares under penalty of perjury under the laws of the State of Washington that the following is true and correct.

My name is **Maria Aguilar** . I am the agent of the Plaintiff in this action.

I am the managing agent of the HEATHER RIDGE APARTMENTS where the Defendant(s) is/are a tenant(s). The Defendant's address is 20409 68 TH AVENUE WEST, #H-302, LYNNWOOD, Washington.

A 30-Day Notice was served on September 7, 2023.

In the 30 days following the service of that notice, the tenant(s) did not pay or vacate.

To the best of my knowledge, defendant(s) is not a member of any branch of the armed services.

I have never seen the resident in a military uniform.

DATED: **11/03/2023**

Maria Y. Aguilar

Signature

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

HEATHER RIDGE APARTMENTS, LLC
Plaintiff,

NO.

vs.

GR 17 DECLARATION OF COUNSEL

JOSHUA NUETEH BINDA
Defendant(s).
54605.0009

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- Declaration of Non-Military

which consists of 2 pages, including this Declaration, and it is legible and complete.

DATED: 11/6/23 at Seattle, WA.

PUCKETT & REDFORD PLLC


Randy Redford/WSBA No. 21529
Tom M. Morningstar/WSBA No. 44245
Attorneys for Plaintiff