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FILED

JUN 22 2009

THOMAS R. FALLQUIST
SPOKANE COUNTY CLERK

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

GARY G. KELLER,

Plaintiff,

v.

JON A. STRINE and ANJA B. KRAMMER,
husband and wife, and the marital community
comprised thereof,

Defendants.

Case No. **09202767-1**

**COMPLAINT FOR PERSONAL
INJURIES AND DAMAGES**

COMES NOW, Plaintiff, Gary G. Keller, by and through his attorneys of record James K. Vucinovich and Bahareh Samanian of Rossi Cox Vucinovich Flaskamp PC, and for his causes of action against Defendants Jon Ashley Strine and Anja B. Krammer, states and alleges as follows:

I. PARTIES AND JURISDICTION

1. That at all material times, Plaintiff Gary Keller was and is a resident of Mead, Spokane County, Washington.

1 9. That Defendant Strine, while operating a motor vehicle, was negligent in that his
2 conduct fell below a reasonable standard of care required for the operation of a motor vehicle
3 upon the public roads in the State of Washington and related Spokane County traffic code,
4 including but not limited to:

- 5 a. failing to keep the vehicle he was operating under reasonable control;
6 b. operating a motor vehicle in a reckless manner;
7 c. operating a motor vehicle at a speed greater than was reasonable and
8 prudent;
9 d. negligently causing his vehicle to collide with another vehicle;
10 e. failing to avoid a collision with another vehicle within the range of his
11 vision;
12 f. operating a motor vehicle while impaired and under the influence of
13 alcohol;
14 g. failing to keep and maintain a proper lookout; and
15 h. other acts of negligence.

16 10. That as a direct and proximate result of the above-described negligence of
17 Defendant Strine, Plaintiff Gary Keller suffered injuries and damages as herein alleged.

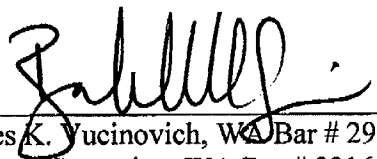
18 11. That as a direct and proximate result of the negligence of the Defendants,
19 Plaintiff Gary Keller sustained severe, permanent, disabling, and disfiguring physical injuries to
20 his body including his head, neck, arms, back, chest, ribs, lungs, pelvis, hips, knees, legs, feet,
21 spine, and the bones, muscles, tissues, ligaments and internal parts thereof, injuries to his
22 muscular and skeletal systems, and paralysis; and that Plaintiff Gary Keller has suffered in the
23 past and will continue in the future to suffer pain and anguish and loss of enjoyment of life, and
24 that he is otherwise injured and permanently disabled;

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- 4. For Plaintiff's attorney fees, costs and disbursements incurred herein; and
- 5. For such other and further relief as the court deems just and proper, including but not limited to prejudgment interest on all liquidated sums.

**ROSSI COX VUCINOVICH
FLASKAMP PC**

DATED: June 18th, 2009

By: 
 James K. Yucinovich, WA Bar # 29199
 Bahareh Samanian, WA Bar # 33165
 ATTORNEYS FOR PLAINTIFF

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09202767-1

SUMMONS

TO THE DEFENDANT: JON A. STRINE

A lawsuit has been started against you in the above-entitled court by GARY G. KELLER, 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 be entered against you without notice. A default judgment is one where

SUMMONS
Page 1 of 2

**ROSSI COX VUCINOVICH
FLASKAMP PC**
10800 NE 8th Street, Suite 1122
Bellevue, Washington 98004-4456
(425) 646-8003/ Fax (425) 646-8004

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Plaintiff is entitled to what he asked 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.

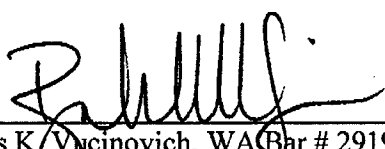
You may demand that the Plaintiff file this lawsuit with the Court. If you do so, the demand must be in writing and must be served upon the person signing this Summons. Within 14 days after you serve the demand, the Plaintiff must file this lawsuit with the Court, or the service on you of this Summons and Complaint will be void.

If you wish to seek the advice of any 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.

**ROSSI COX VUCINOVICH
FLASKAMP PC**

DATED: June 18th, 2009

By: 
James K. Vucinovich, WA Bar # 29199
Bahareh Samanian, WA Bar # 33165
10900 NE 8TH Street, Suite 1122
Bellevue, WA 98004
(425) 646-8003
ATTORNEYS FOR PLAINTIFF