

FILED

14 JUN 30 PM 2:46

KING COUNTY
SUPERIOR COURT CLERK
E-FILED

CASE NUMBER: 14-2-14687-6 SEA

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

TRIANGLE PROPERTY DEVELOPMENT,
LLC, a Washington Limited Liability Company,

Plaintiff,

vs.

BYRON L. BARTON and JEAN BARTON,
and JOHN DOE TENANT(S),

Defendant(s).

Case No. 14-2-14687-6 SEA

**DECLARATION OF SYNTHIA
MELTON IN SUPPORT OF
PLAINTIFF'S RESPONSIVE MOTION
OPPOSING STAY OF
ENFORCEMENT OF WRIT OF
RESITUTION PENDING APPEAL**

DECLARATION

I declare, under penalty of perjury, under the laws of Washington State, that the foregoing is true and correct to the best of my knowledge and belief:

1. I am the attorney of record for the Plaintiff, Triangle Property Development, LLC.
2. Pursuant to RCW 59.12.200 and RAP 8.1, Plaintiff is entitled to a supersedeas bond for attorney fees, costs and expenses likely to be awarded on appeal, plus the amount of loss which it will incur as a result of its inability to enforce the judgment during review. I am requesting attorneys fees and costs in the amount of \$5000 which is an estimate of the time and costs that will be incurred during the appeal's pendency.
3. I am also requesting that the court require a bond for 6.5 months to one year of rent, in the amount of \$18,200 to \$34,000, which is the reasonable value of the use of the

1 Property pending the appeal. This amount is based on the attached Zillow estimate of
2 monthly rent for the Property, \$2,835 per month, multiplied by the number of months
3 expected for the duration of appeal under the Rules of Appellate Procedure's timeline
4 for parties' filing of briefs and the projected time until a decision is reached in this
5 matter. *See* Exhibit 1.
6

7 I declare that the foregoing is true and correct to the best of my knowledge and belief.

8
9 Signed this 30th day of June, 2014, at Renton, WA.

10 **DIMENSION LAW GROUP, PLLC**

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12 

13 Synthia Melton, WSBA # 43593

14 Attorneys for Plaintiff

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EXHIBIT 1



6548 41st Ave SW, Seattle, WA 98136

4 beds, 2 baths, 3,200 sqft

Scheduled for trustee sale/ foreclosure auction on 2014-04-11 10:00:00 the opening bid that has been set by the bank on this property is \$464,000.00. Our software allows investors to track these type of properties and have been successful in buying properties 60-70 cents on the dollar. www.shopprop.com does not represent the seller. For more information please go to our website at www.shopprop.com . As with all trustee...

Facts

Lot: 9,224 sqft
Single Family

Built in 1928
Heating: Other

Features

Fireplace

Unfinished basement, 620 sqft

View: Water

▼ [More](#)

Off Market

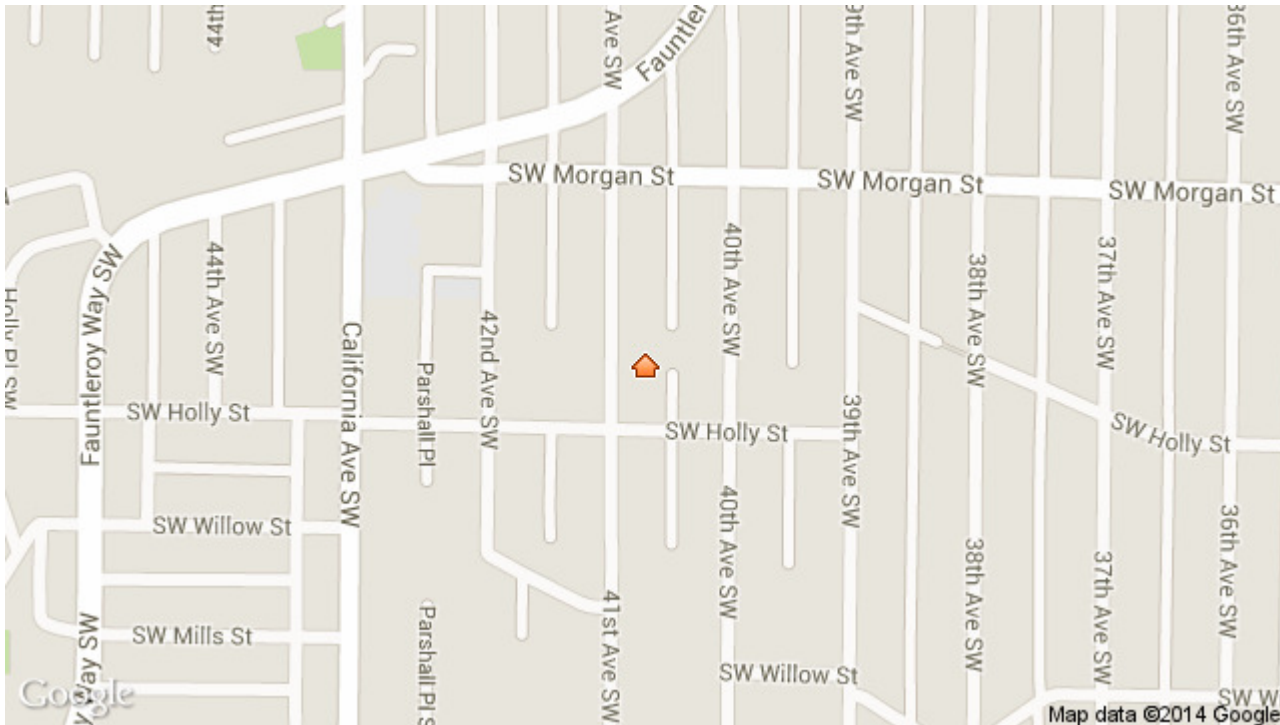
Zestimate®: \$753,891

Rent Zestimate®: \$2,835/mo

Est. Refi Payment:

\$2,866/mo ☐

Map



Home Values

Zestimate

\$753,891

+\$23,958 Last 30 days

\$716K **\$792K**

Zestimate range

Rent Zestimate

\$2,835/mo

+\$118 Last 30 days

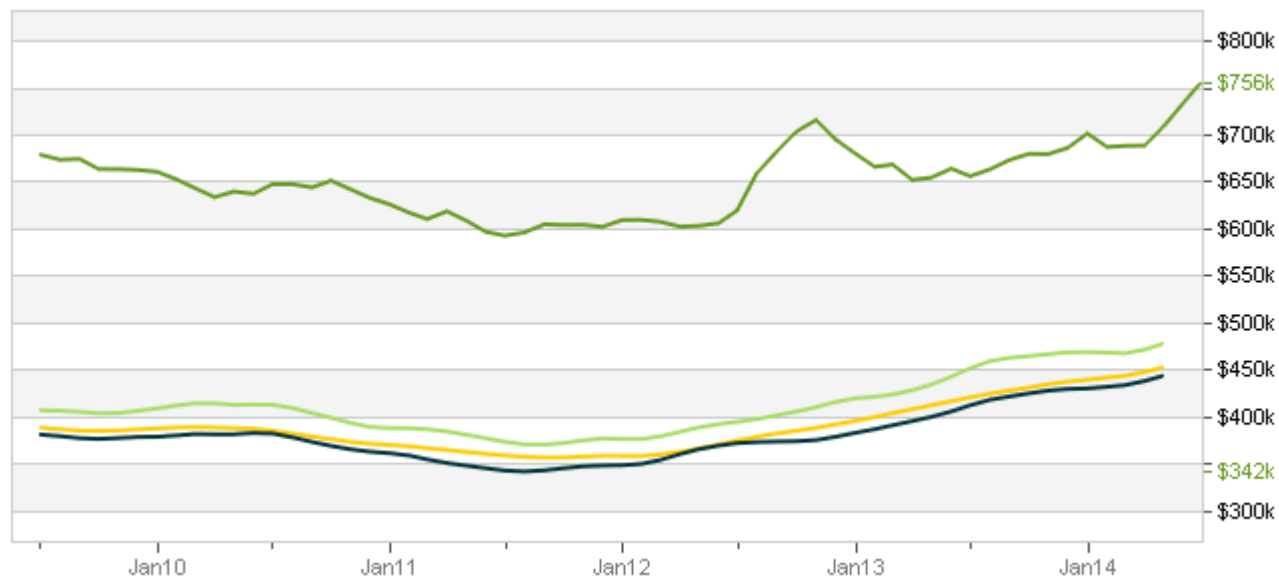
\$1.8K **\$3.5K**

Zestimate range

Zestimate forecast

To see Zestimate
forecast

One year



This home

Gatewood

98136

Seattle

Price History

Date	Event	Price	\$/sqft	Source
04/28/14	Sold: Foreclosure Auction	\$646,000 +39.2%	\$201	Public Record
04/11/14	Listed for sale	\$464,000	\$145	Agent

Tax History

Year	Property taxes	Change	Tax assessment	Change
2013	\$4,561	--	\$580,000	8.8%

Home Design

Thinking remodel? See home

Estimate \$86,200