



202310160085

10/18/2023 02:39 PM Pages: 1 of 4 Fees: \$208.50  
Skagit County Auditor

Document Title:

Lis Pendens

Reference Number :

Grantor(s):

additional grantor names on page \_\_\_\_.

1. Robert Lott and Christina Lott, husband and wife
- 2.

Grantee(s):

additional grantee names on page \_\_\_\_.

1. Robin Cully
- 2.

Abbreviated legal description:

full legal on page(s) 3.

(5.0800 ac) THE SOUTH 1/2 OF THE NORTHEAST 1/4 OF THE SOUTHEAST 1/4 OF THE NORTHWEST 1/4, SECTION 32, TOWNSHIP 36 NORTH, RANGE 4 EAST, W.M.

Assessor Parcel / Tax ID Number:

additional tax parcel number(s) on page \_\_\_\_.

360432-2-013-0502 P50489

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26

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

ROBIN CULLY, a married man, as his sole  
and separate property,

Plaintiff,

v.

DAVID BRUNSON & JACKIE BRUNSON,  
h/w; DANIEL COSTANTI & CATHERINE  
COSTANTI, h/w; SCOTT COSTANTI &  
MICHELLE COSTANTI, h/w; THERISE  
KIRKHAM & JOHN DOE KIRKHAM, h/w;  
ERIC FISHER & DANIELLE FISHER, h/w;  
DENNIS FRANSSON, a single man, DANIEL  
GORTON & VALERIE GORTON, h/w;  
ROBERT HILLIER & JANE DOE HILLIER,  
h/w; HILLIER CREDIT TRUST, ROBERT  
HILLIER, Trustee; CARL ISHAM &  
RICHELLE STOCKMAN, h/w; IGOR  
KASKO & OLGA TIKHONOV, h/w;  
ROBERT LOTT & CHRISTINA LOTT, h/w;  
DAVID MARTINEZ & AMANDA  
MARTINEZ, h/w; EDWIN MERCER, a  
single man; ROBERT MILLER & ROBIN  
MILLER, h/w; RONALD MORTON &  
DORENE MORTON, h/w; LEANNE  
SHANNON, a single woman; MONICA  
WASISCO, a single woman; BRANDON  
GARRISON & RACHEL GARRISON, h/w;  
PATRICIA A. NEIL DICKINSON, a single  
woman; ANDREW SHAMP & JANNA  
SHAMP, h/w; UNITED WHOLESALE  
MORTGAGE LLC, a Michigan Limited

NO. 22-2-00581-29

LIS PENDENS

LIS PENDENS - 1

SHULTZ LAW OFFICES  
127 E FAIRHAVEN AVENUE  
BURLINGTON, WASHINGTON 98233  
Telephone: (360) 404-2017  
Facsimile: (360) 404-2018

1 Liability Company; WELLS FARGO BANK)  
 2 N.A.; NEW DAY FINANCIAL LLC, a  
 3 Delaware Limited Liability Company;  
 4 UMPQUA BANK; WASHINGTON  
 5 FEDERAL BANK; KEYBANK N.A.);  
 6 CAROLYN B. HILLIER, a single woman;  
 7 BANNER BANK; ROCKET MORTGAGE  
 8 LLC, a Washington Limited Liability  
 9 Company; LAKEVIEW LOAN SERVICING  
 10 LLC, a Delaware Limited Liability Company;  
 11 HERITAGE BANK; ALL PERSONS  
 12 UNKNOWN, CLAIMING ANY LEGAL OR  
 13 EQUITABLE RIGHT, TITLE, ESTATE,  
 14 LIEN, OR INTEREST IN THE PROPERTY  
 15 DESCRIBED IN THE PETITION ADVERSE  
 16 TO PLAINTIFF'S TITLE, OR ANY CLOUD  
 17 UPON PLAINTIFF'S TITLE THERETO,

Defendants.

18 NOTICE IS HEREBY GIVEN that ROBIN CULLY, Plaintiff herein, has commenced an  
 19 action against the above-named Defendants in the Superior Court for Skagit County by filing a  
 20 Summons and Petition to Quiet Title. This is notice of pendency of said action. The names of  
 21 the parties to said action are set forth above. The object of the action is to quiet title to real  
 22 property for purposes of access to landlocked property owned by Plaintiff pursuant to RCW  
 23 Chapter 7.28 and 8.24, *et seq.* The description of the real property situated in Skagit County,  
 24 Washington, affected by this Lis Pendens is as follows:

SEE EXHIBIT "A"

25 All persons dealing with said real estate subsequent to the filing hereof will take subject to  
 26 the rights of Plaintiff as established in this action.

DATED this 16 day of October, 2023.

SHULTZ LAW OFFICES PLLC

  
 John A. Shultz, WSPA No. 42542  
 Attorney for Plaintiff

LIS PENDENS - 2

SHULTZ LAW OFFICES  
 127 E FAIRHAVEN AVENUE  
 BURLINGTON, WASHINGTON 98233  
 Telephone: (360) 404-2017  
 Facsimile: (360) 404-2018

**EXHIBIT A**

**Robert Lott and Christina Lott**

Parcel A:

The South  $\frac{1}{2}$  of the Northeast  $\frac{1}{4}$  of the Southeast  $\frac{1}{4}$  of the Northwest  $\frac{1}{4}$ , Section 32, Township 36 North, Range 4 East, W.M.

Situated in Skagit County, Washington.

Parcel B:

A non-exclusive easement for ingress, egress and utilities as set forth in that certain Declaration of Easement recorded February 2, 1971, under Recording No. 748357.

Situated in Skagit County, Washington.