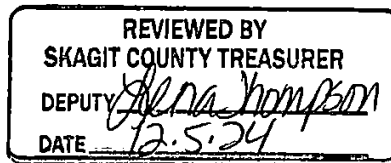




202412050116

12/05/2024 03:45 PM Pages: 1 of 5 Fees: \$307.50
Skagit County Auditor



Document Title:

Easement Agreement

Reference Number :

Grantor(s):

☐ additional grantor names on page ____

1. Costanti Daniel and Catherine Costanti

2. Morton Ronald and Morton Dorene

Grantee(s):

☐ additional grantee names on page ____

1. Cully, Robin D

2.

Abbreviated legal description:

☒ full legal on page(s) 5.

The North 30 feet of these parcels as defined in Skagit County Auditor file 7912190025

Assessor Parcel / Tax ID Number:

☐ additional tax parcel number(s) on page ____

P50479, P50480, P50472, and P110140

P50499

FILED
SKAGIT COUNTY CLERK
SKAGIT COUNTY, WA

2023 APR -7 AM 9:39

Honorable Judge Brian L. Stiles /
Honorable Judge Thomas L. Verge
Hearing Date: April 7, 2023
Hearing Time: 9:30 a.m.
Civil Motion Calendar (Default Judgment)
Location: Skagit County Superior Court

22-2-00581-29
DFJG 56
Default Judgment
14272410



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.

No. 22-2-00581-29

DEFAULT JUDGMENT

~~PROPOSED~~

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
Liability Company; WELLS FARGO BANK

DEFAULT JUDGMENT - 1

I, MELISSA BEATON, Clerk of the Superior Court of
the State of Washington, for Skagit County, do
hereby certify that this is a true copy of the original
now on file in my office. Dated 12/5/24



MELISSA BEATON, County Clerk
By: [Signature]
Deputy Clerk

SHULTZ LAW OFFICES PLLC
317 S. 2ND STREET, SUITE 101
MOUNT VERNON, WASHINGTON 98273
Telephone: (360) 404-2017
Facsimile: (360) 404-2018

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

17 Defendants.

18 THIS MATTER having come on regularly for hearing on the 7th day of April 2023, before the
19 undersigned Judge/Commissioner of the above-entitled Court, the Plaintiff appearing by and through their
20 Attorney, John A. Shultz of Shultz Law Offices; the Defendants not appearing; and the Court having
21 previously entered an Order of Default against the below-named Defendants, and the Court having
22 reviewed the files and records herein and being fully advised in the premises, now, therefore, it is

23 ORDERED, ADJUDGED, AND DECREED that Plaintiff ROBIN CULLY, is hereby awarded
24 default judgment against Defendants SCOTT COSTANTI & MICHELLE COSTANTI, DANIEL
25 COSTANTI & CATHERINE COSTANTI, THERISE KIRKHAM & JAMES KIRKHAM, RONALD
MORTON & DORENE MORTON, BRANDON GARRISON & RACHEL GARRISON, and
PATRICIA A. NEIL DICKINSON, as follows:


- 1) Plaintiff is granted an easement and/or rights of access across said Defendants' properties as identified on the attached Exhibit "1" for purposes of ingress, egress, and utilities to and from the subject landlocked property owned by Plaintiff (P50499) that is the subject of this cause of action;
- 2) Plaintiff reserves the right to apply to the Court for an award of attorneys' fees and costs to Plaintiff in the event this Motion is contested and to the extent allowed under RCW 7.28, *et seq.*

DEFAULT JUDGMENT - 2

SHULTZ LAW OFFICES PLLC
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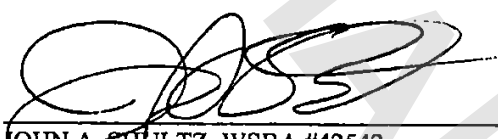
1 3) Plaintiff reserves all other rights and remedies as prayed for in the original Complaint
2 filed herein, or amendments thereto, including the right to seek injunctive relief, modify this
3 order, or any other further relief in this cause as may be necessary to enforce Plaintiff's rights
4 herein.

5 DONE IN OPEN COURT this 7 day of April, 2023.

6
7
8 
9 JUDGE/COURT COMMISSIONER

10 Presented by:

11 SHULTZ LAW OFFICES PLLC

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14
15 JOHN A. SHULTZ, WSBA #42542
16 Attorney for Plaintiff
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24
25

DEFAULT JUDGMENT - 3

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EXHIBIT "1"

****Plaintiff reserves all rights to correct the following legal descriptions as may be necessary and appropriate for legal access to P50499**

<u>Defendant</u>	<u>Parcel</u>	<u>Grant of Easement / Access</u>
Scott Costanti	P50310	To Plaintiff (P50499) an easement for ingress, egress, and utilities over and across the southerly 30 feet along the southwest property line of P50310, consents to Plaintiff (P50499) accessing Morton RD as defined in Skagit County AF# 7912190025
Scott Costanti & Michelle Costanti	P50243	Consents to Plaintiff (P50499) accessing Morton RD as defined in Skagit County AF# 7912190025
Daniel Costanti & Catherine Costanti	P50480	To Plaintiff (P50499) an easement for ingress, egress, and utilities over and across the northerly 30 feet along the north property line of P50480; consents to Plaintiff (P50499) accessing Morton RD as defined in Skagit County AF# 7912190025
Daniel Costanti & Catherine Costanti	P50479	Consents to Plaintiff (P50499) accessing Morton RD as defined in Skagit County AF# 7912190025
Daniel Costanti & Catherine Costanti	P110141	Consents to Plaintiff (P50499) accessing Morton RD as defined in Skagit County AF# 7912190025
Therise Kirkham & James Kirkham	P50241	To Plaintiff (P50499) an easement for ingress, egress, and utilities over and across the northerly 30 feet along the northeast property line of P50241; consents to Plaintiff (P50499) accessing Morton RD as defined in Skagit County AF# 7912190025
Ronald Morton &	P50472	To Plaintiff (P50499) an easement for ingress, egress, and utilities over and across the northerly 30 feet along the north property line of P50472; consents to Plaintiff (P50499) accessing Morton RD as defined in Skagit County AF# 7912190025
Dorene Morton	P110140	To Plaintiff (P50499) an easement for ingress, egress, and utilities over and across the northerly 30 feet along the north property line of P110140; consents to Plaintiff (P50499) accessing Morton RD as defined in Skagit County AF# 7912190025
Brandon Garrison & Rachel Garrison	P50462	Consents to Plaintiff (P50499) accessing Morton RD as defined in Skagit County AF# 7912190025
Patricia Neil Dickinson	P50316	Consents to Plaintiff (P50499) accessing Morton RD as defined in Skagit County AF# 7912190025
Patricia Neil Dickinson	P110142	Consents to Plaintiff (P50499) accessing Morton RD as defined in Skagit County AF# 7912190025