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9 **BEFORE THE SKAGIT COUNTY HEARING EXAMINER**

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11 **ERIC BATTLES AND EMILY**
12 **MCLAUGHLIN**, a married man and woman,
and their marital community,

13 Appellants,

14 v.

15 **SKAGIT COUNTY**, a Washington Municipal
Corporation

16 Defendant.
17

NO. APL 206-0002

**OBJECTION TO APPEAL BEING
LITIGATED IN THIS TRIBUNAL**

18 COMES NOW, Jane Koler and Callan Johns, Land Use & Property Law, PLLC,
19 representing Appellants Eric Battle and Emily McLaughlin. Appellants object to this
20 appeal going forward in this tribunal at this time. This is essentially an inverse
21 condemnation action. This tribunal has no jurisdiction over constitutional issues.
22 Further, Appellants have a right to a jury trial on their inverse condemnation claim.
23 Appellants object to this administrative appeal going forward until a jury adjudicates
24 their inverse condemnation claim.
25

1 DATED this 1 day of May 2026.

2 LAND USE & PROPERTY LAW, PLLC

3 

4 Jane Koler, WSBA No. 13541

5 Callan Johns, WSBA No. 60985

6 Attorneys for Battles and McLaughlin

1 **CERTIFICATE OF SERVICE**

2 I, Callan Johns, hereby state that I am over the age of 18 years, competent to testify,
3 and certify to the following based on my own knowledge and belief. On the date below stated,
4 I caused the Objection to Administrative Appeal Being Litigated in this Tribunal to be sent in
5 the manner noted to the following parties:

6 Hearing Examiner
7 ☐ Via U.S. Mail, postage prepaid
8 ☐ Via Hand Delivery
9 ☒ Via E-Mail to:
10 HEhearings@co.skagit.wa.us

11 Jason D'Avignon
12 ☐ Via U.S. Mail, postage prepaid
13 ☐ Via Hand Delivery
14 ☒ Via E-Mail to:
15 jasond@co.skagit.wa.us

16 Pamela C. Herman
17 ☐ Via U.S. Mail, postage prepaid
18 ☐ Via Hand Delivery
19 ☒ Via E-Mail to:
20 pherman@co.skagit.wa.us

21 I declare under penalty of perjury under the laws of the State of Washington that
22 the foregoing is true and correct.

23 DATED this 1st day of May 2026 at Gig Harbor, Washington.

24 **/s/ Callan Johns**
25 Callan Johns