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

**CHRISTOPHER J. HUPY, an individual,**

**Plaintiff,**

**vs.**

**DOUGLAS BARTHOLOMEW, an individual,**

**Defendant.**

**NO. 14-2-05926-2**

**DEFENDANT'S ANSWER TO  
COMPLAINT AND AFFIRMATIVE  
DEFENSES**

**I. ANSWER**

Defendant Douglas Bartholomew, through his undersigned attorneys, answers plaintiff's Complaint as follows:

1. In answer to paragraph 1 of the plaintiff's Complaint, the defendant has insufficient knowledge to form a belief as to the plaintiff's residency. Without admitting any of the allegations in the Complaint, including that the defendant has provided health care services to the plaintiff, the defendant makes no answer to the remaining allegations in paragraph 1 of the Complaint in order to protect himself from further accusations of unauthorized disclosure of

DEFENDANT'S ANSWER TO COMPLAINT AND  
AFFIRMATIVE DEFENSES- 1

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SEATTLE, WA 98119-4296  
TEL 206 441-4455  
FAX 206 441-8484

**COPY**

1 protected healthcare information under chapter 70.02 RCW. The defendant accordingly denies  
2 the remaining allegations in paragraph 1 of the Complaint.

3 2. The defendant denies the allegations in paragraph 2 of the Complaint.

4 3. In answer to paragraphs 3, 4, and 5 of the Complaint, the defendant does not  
5 dispute jurisdiction and venue. The defendant denies any and all allegations remaining in  
6 paragraphs 3, 4, and 5 of the Complaint.

7 4. In answer to paragraph 6 of the Complaint, the defendant admits that he is  
8 currently and has been a licensed healthcare provider at all times material to this action. He  
9 denies that his license number is LM00003582. The defendant denies any and all allegations  
10 remaining in paragraph 6 of the Complaint.

11 5. In answer to paragraph 7 of the Complaint, the plaintiff improperly seeks legal  
12 conclusions for which no answer is required of the defendant. To the extent that paragraph 7  
13 contains factual allegations which require an answer, the defendant denies the allegations  
14 contained therein.

15 6. Without admitting any allegations in the Complaint, including that the defendant  
16 has provided health care services to the plaintiff, the defendant makes no answer to paragraphs 8,  
17 9, 10, 11, and 12 of the Complaint in order to protect himself from further accusations of  
18 unauthorized disclosure of protected healthcare information under chapter 70.02 RCW. The  
19 defendant accordingly denies all allegations in paragraphs 8, 9, 10, 11, and 12 of the Complaint.

20 7. The defendant denies any and all allegations in the plaintiff's Complaint that  
21 remain unanswered.

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24 DEFENDANT'S ANSWER TO COMPLAINT AND  
AFFIRMATIVE DEFENSES- 2

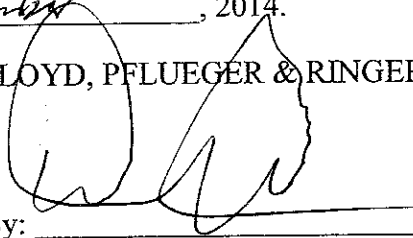
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DATED this 3 day of November, 2014.

FLOYD, PFLUEGER & RINGER, P.S.



By: \_\_\_\_\_  
David J. Corey, WSBA # 26683  
Of Attorneys for Defendant

DEFENDANT'S ANSWER TO COMPLAINT AND  
AFFIRMATIVE DEFENSES- 4

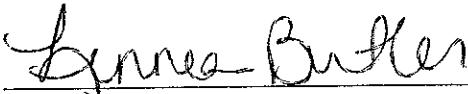
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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies under penalty of perjury under the laws of the State of Washington that on the 4 day of November, 2014, I caused to be served a true and correct copy of the foregoing, via legal messengers, or via U.S. Mail by depositing the same in an envelope, postage pre-paid thereon, addressed to the following:

Christopher J. Hupy  
13222 29<sup>th</sup> Avenue SE  
Mill Creek, WA 98012

  
\_\_\_\_\_  
Linnea Butler  
Legal Assistant to David J. Corey

DEFENDANT'S ANSWER TO COMPLAINT AND  
AFFIRMATIVE DEFENSES- 5

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