

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

SUPERIOR COURT OF WASHINGTON FOR SNOHOMISH COUNTY

CHRISTOPHER J. HUPY, an individual,
Plaintiff,

No. 15-2-03020-3

vs.

SUSAN CRAIGHEAD, PALMER ROBINSON, in
their professional and/or personal capacity, and
any unknown 1 to 75 JOHN and/or JANE DOE(S)
at this time,
Defendants.

**DEFENDANTS' FIRST SET OF
INTERROGATORIES AND
REQUESTS FOR PRODUCTION TO
PLAINTIFF**

TO: CHRISTOPHER J. HUPY, Pro se Plaintiff

In accordance with CR 26, CR 33 and CR 34, you are hereby required to answer, in writing, the following interrogatories separately and fully under oath, within thirty (30) days of their service upon you. These interrogatories are deemed continuing in nature and you must supplement your answers pursuant to CR 26(e).

PRELIMINARY STATEMENT

These interrogatories call for all information (including information contained in or on writings, recordings, photographs, or any other tangible thing or material) that is known or available to you, including all information in possession of your doctors, agents, attorneys,

1 accountants, auditors or other persons or experts and any investigators or any person acting on
2 your behalf or under you or your attorney's employment, direction and/or control.

3 If you are asserting that part of any response to an interrogatory is privileged, specify the
4 grounds therefore, identify the alleged privileged documents or conversations by date, author,
5 recipient and general subject matter, and provide all information responsive to the interrogatory
6 which does not fall within your claim of privilege.

7 Unless conclusively negated by the context of the question, the following is to be
8 considered applicable to all questions contained in this set of written interrogatories:

9 A. The singular number and the masculine gender as used herein shall embrace, and
10 be read and applied as the plural or the feminine or the neuter, as the circumstances may make
11 appropriate.

12 B. The word "person" includes the plural as well as the singular and includes any
13 natural person, firm, association, partnership, corporation, or other form of legal entity.

14 C. Each interrogatory is intended to, and does request that each and every particular
15 and part thereof be answered with the same force and effect as if each part and particular were
16 the subject of and were asked by a separate interrogatory.

17 D. The terms "document" and/or "writing" mean and include, but are not limited to,
18 any printed, typewritten, or handwritten matter of whatever character, and every other form of
19 recording upon any tangible thing.

20 E. The phrases "Medicare-eligible" or "eligible for Medicare benefits" means an
21 individual who is either 1) 65 years or older; OR 2) less than 65 years old AND also:

22 (a) has received Social Security Disability Insurance benefits for twenty-four
23 (24) months or more; OR

1 (b) has received Railroad Retirement Board disability benefits for twenty-four
2 (24) months or more; OR

3 (c) has end-stage renal disease (*i.e.* permanent kidney failure requiring
4 dialysis or transplant); OR

5 (d) has amyotrophic lateral sclerosis disease (*i.e.*, Lou Gehrig's Disease); OR

6 (e) has met any other qualification entitling the individual to receive Medicare
7 benefits.

8 F. Whenever you are asked to identify any document or writing, state with respect to
9 each such document or writing:

10 (a) The date it bears and the date it was prepared,

11 (b) The identity of the author and/or originator,

12 (c) The identity of each addressee,

13 (d) The nature and substance thereof,

14 (e) The identity of the present custodian thereof,

15 (f) The present location of the document, and

16 (g) Whether you will provide a copy thereof without further request.

17 G. Whenever you are asked to identify or describe an oral communication or
18 conversation, state with respect thereto:

19 (a) The date and place thereof and whether it was in person or by telephone,

20 (b) The identity of each person who participated in or heard any part of
21 communication,

22 (c) The substance of what was said by each person who participated therein,

23 and

1 (d) The identity of any document that recorded, summarized or confirmed the
2 oral communication.

3 H. Whenever you are asked to identify any person, state with respect to such person:

- 4 (a) The person's name,
5 (b) Such person's last known business address and telephone number,
6 (c) Such person's last known residence address and telephone number,
7 (d) Such person's present occupation and business affiliation, and
8 (e) Such person's occupation and business affiliation at the time to which
9 your answer relates.

10 You are hereby notified that the following interrogatories shall be deemed continuing,
11 and any additional information, including any conclusions, opinions or contentions that are
12 different from those set forth in plaintiff's answers relating in any way to these interrogatories,
13 which the plaintiff acquires subsequent to the date of answering these interrogatories and up to
14 and including the date of trial, shall be furnished to defendants promptly after such information is
15 acquired.

1 INTERROGATORIES

2 INTERROGATORY NO. 1: At page 3, paragraph 14 of your complaint, you state:

3 “Judicial Intellectual Property is provided by Defendants to the personal financial
4 and legal benefit of certain parties while the plaintiff was willfully and
deliberately excluded from the same benefit(s).”

5 Please state:

6 a) What you mean by “Judicial Intellectual Property;” and

7 b) Each and every fact you contend supports your allegations on page 3, paragraph
8 14 of your complaint.

9 ANSWER:

10
11
12
13
14
15 INTERROGATORY NO. 2: Please state the reasons you are suing the city of Seattle in

16 KCSC Cause No. 15-2-04469-9.

17 ANSWER:

1 INTERROGATORY NO. 3: Please state each and every fact you content supports your
2 allegation at page 3, Paragraph 15 of you complaint, that you have been “historically denied
3 access to the King County Courthouse as a direct result of the acts and/or omissions by the
4 defendants.”

5 ANSWER:
6
7
8
9
10

11 INTERROGATORY NO. 4: At page 3-4, Paragraph 17 of your complaint, you allege
12 that:

13 “On February 24, 2015 Defendant Susan Craighead issued an Order Setting Civil
14 Case Schedule requiring plaintiff to perform various functions by certain dates or
15 be subjected to case dismissal and/or sanctions. Defendant Craighead also
ordered the assignment of defendant Palmer Robinson to preside over KCSC
cause 15-2-04469-9 Hupy v. City of Seattle”.

16 If you are contending that Susan Craighead acted wrongfully in the above
17 allegation, please state what actions were wrongful and why the actions were wrongful.

18 ANSWER:
19
20
21
22
23

1 INTERROGATORY NO. 5: At page 4, Paragraph 18 of your complaint, you allege that:

2 “Defendants Craighead has denied constitutional rights of plaintiff by act or
3 omission by refusing to provide plaintiff a hearing date in KCSC cause number
08-2-22578-0 Calvillo v. Hupy”.

4 Please state each and every fact you believe supports your allegation that defendant
5 Craighead’s actions or omissions were wrongful or unconstitutional and why the actions were
6 wrongful or unconstitutional.

7 ANSWER:

8
9
10
11
12 INTERROGATORY NO. 6: At page 4, Paragraph 19 of your complaint, you allege that:

13 “Defendants have assumed Judicial disciplinary authority in excess of their
14 function via King County Superior Court Local rules further prejudicing
plaintiff’s rights”.

15 Please state each and every fact you contend supports your claim that defendants have
16 assumed judicial disciplinary authority in excess of their function(s), and what rules the court
17 violated, if any.

18 ANSWER:

1 INTERROGATORY NO. 7: Do you contend that any of the defendants violated the
2 Judicial Canons? If so, please state how each defendant violated the Canons and which Canon
3 each defendant violated.

4 ANSWER:
5
6
7
8
9
10

11 INTERROGATORY NO. 8: Please state each and every fact you contend supports your
12 allegation at pages 5-6 of your complaint, paragraph 25, that:

13 “Defendants have engaged in a pattern of diversion of Public resources for a
14 Private cause that does not support the poor and/or indigent, but one which
15 generates income via fees and/or charges for the private business via the King
16 County BAR Association, at the expense of the plaintiffs’ constitutional rights.
17 Defendants have sworn Oaths to support the Washington State Constitution and to
18 faithfully and impartially discharge the duties of judge; defendants have violated
19 their oaths of office by this pattern of egregious and habitual violation of
20 plaintiffs’ constitutional rights”.

21 ANSWER:
22
23

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

INTERROGATORY NO. 9: Please state each and every action by defendants that you contend were not “normal judicial functions”, as alleged at page 6, paragraph 26 of your complaint.

ANSWER:

INTERROGATORY NO. 10: Please state each and every willful, wanton or ultra vires act you content defendants committed as alleged at page 6, paragraph 29 of your complaint.


ANSWER:

1 REQUEST FOR PRODUCTION NO. 1: Please produce a copy of each and every
2 document, memo, email, pleading, letter, or other writing that you contend supports the claims
3 you are making in your complaint.

4 RESPONSE:

10 DATED this 27th day of April, 2015.

11 DANIEL T. SATTERBERG
12 King County Prosecuting Attorney

13 By: 
14 JOHN R. ZELDENRUST, WSBA No. 19797
15 Senior Deputy Prosecuting Attorney
16 500 Fourth Ave., 9th Floor
17 Seattle, WA. 98104
18 Telephone: (206) 296-8820
19 Fax: (206) 296-8819
20 E-Mail: john.zeldenrust@kingcounty.gov
21 Attorneys for Defendants

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


CERTIFICATE OF SERVICE AND MAILING

I hereby certify that on April 27, 2015, I sent the foregoing document by email and via U.S. Mail to the following:

Christopher J. Hupy
13222 - 29th Ave SE
Mill Creek, WA 98012
Ph.: 425-385-3459
amakirkland@hotmail.com

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

DATED this 27th day of April, 2015.


Cynthia L. Nelson
Cynthia.nelson@kingcounty.gov
Paralegal
King County Prosecuting Attorney's Office

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

ANSWERS AND OBJECTIONS DATED this ____ day of _____, 2015

in conformance with CR 26(g).

Christopher J. Hupy, Plaintiff, pro se

STATE OF WASHINGTON)
) ss.
COUNTY OF KING)

Christopher J. Hupy, being first duly sworn on oath, deposes and says:

That he has made the foregoing answers to interrogatories, knows the contents thereof, and believes the same to be true and complete.

CHRISTOPHER J. HUPY

SUBSCRIBED AND SWORN to before me
This ____ day of _____ 2015.

Printed Name

NOTARY PUBLIC in and for the State
of Washington
My commission expires _____.