

1 SUPERIOR COURT FOR THE STATE OF WASHINGTON
2 IN THE COUNTY OF SNOHOMISH

3 CHRISTOPHER J. HUPY, an individual, and THOMAS
4 BRET HAGGERTY, an individual

5 Plaintiffs,

6 v.

7 The Actors of KING COUNTY SUPERIOR COURT; The
8 FOLOWING King County Superior Court Judges in their
9 professional capacity; SUSAN CRAIGHEAD, PALMER
10 ROBINSON, MARIANE SPEARMAN, JIM RODGES, J.
11 WESLEY SAINT CLAIR, PATRICK H. OISHI, RICHARD
12 MCDERMOTT, MICHAEL TRICKEY, SUSAN AMINI,
13 BETH ANDRUS, MONICA BENTON, ELIZABETH
14 BERNIS, BILL BOWMAN, TIMOTHY BRADSHAW,
15 REGINA CAHAN, GREG CANOVA, CHERYL CAREY,
16 JAMES CAYCE, JOHN H. CHUN, ANDREA DARVAS,
17 WILLIAM DOWNING, THERESA DOYLE, JOAN
18 DUBUQUE, RICHARD D. EADIE, BRIAN GAIN, JULIA
19 GARRATT, HELEN HALPERT, BRUCE HELLER,
20 HOLLIS HILL, LAURA INVEEN, RONALD KESSLER,
21 BARBARA LINDE, DEAN LUM, BARBARA MACK,
22 LEROY MCCULLOUGH, LAURA GENE MIDDAUGH,
23 DOUGLASS NORTH, SEAN O'DONNELL, SUZANNE
24 PARISIEN, KIMBERLY PROCHNAU, JEFFREY
25 RAMSDELL, JUDITH RAMSEYER, JEAN RIETCHEL,
26 MARY E. ROBERTS, ROGER ROGOFF, JOHN R. RUHL,
27 CAROL SHAPIRA, KEN SCHUBERT, CHATHERINE
28 SHAFFER, LORI-KAY SMITH, JULIE SPECTOR, MARY
29 YU and up to 30 additional JOHN AND/OR JANE DOE(S).
30 HEREAFTER COLLECTIVELY REFFERED TO AS
31 "JUDICIAL ACTORS"

32 Defendant(s).

NO.

DECLARATION IN
SUPPORT OF EX
PARTE MOTION
FOR EMERGENCY
TEMPORARY
RESTRAINING
ORDER

1 Comes now plaintiffs, Christopher J. Hupy, the following I do declare:
2

3 On Tuesday April 29th, 2014 I sent an electronic message (see attached exhibit A)
4 addressed to King County Senior Deputy Prosecuting Attorney Thomas Kuffel (WSBA
5 #20118) (see attached exhibit B), King County Prosecuting Attorney Daniel Satterberg
6 (WSBA #15400), King County Senior Deputy Prosecutor Kevin Wright, and other additional
7 interested parties including two King County Superior Court Judges (Chief Presiding Judge
8 Susan Craighead and Assistant Chief Presiding Judge Palmer Robinson) in an effort to
9 effectuate Process of Service and general communication between the parties. I did this to
10 avoid any embarrassment of the Judicial Officers which potentially could result from a "fleet"
11 of process servers scouring the King County Courthouse and MRJC looking for Judges to
serve.

12 On Wednesday April 30th, 2014 KCPA Senior Deputy Thomas "Tom" Kuffel
13 responded back, indicating the KCPA Office does and will represent the defendants named in
14 this action, and in lieu of personal service we will accept service of the pleadings and do so
via email (electronic mail).

15 Mr. Kuffel stopped short of being able to provide a formal Notice of Appearance until
16 he has had a chance to review the documents (namely the Complaint), he also indicated a
17 busy schedule and may not be able to respond in a instant manner.

18 The Plaintiffs and the KCPA in and through his Senior Deputy Attorney have collaborated to
19 provide a fast and efficient manner to expedite the resolution of this matter.

20 Thomas Kuffel is a person known to me from past experience to be a representative of the
21 Judicial Officers of King County Superior Court in litigious concerns.

With respect to Washington State Supreme Court Civil Rule CR 65(2)b states in

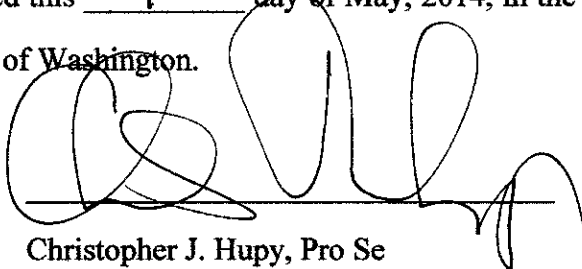
PLAINTIFFS DECLARATION CONCERNING NOTICE- 2

1 relevant part " A temporary restraining order may be granted without written or oral notice
2 to the adverse party or his attorney only if (1) it clearly appears from specific facts shown by
3 affidavit or by the verified complaint that immediate and irreparable injury, loss, or damage
4 will result to the applicant before the adverse party or his attorney can be heard in
5 opposition, and (2) the applicants attorney certifies to the court in writing the efforts, if any,
6 which have been made to give the notice and the reasons supporting him claim that notice
7 should not be required..." I have made contact with counsel for opposing parties, have
8 established a reasonable method of communication and delivery of legal documents and been
9 made aware of the time limitations of their counsel.

10 It is not possible to provide notice to opposing party sufficient to prevent the
11 perpetuation of stated abusive diversionary actions by the defendants, the situation is
12 emergent in nature and rapid intervention by this court is the only mechanism to prevent the
13 loss as supported this declaration and by all other additional pleadings and documents in this
14 case.

15 I am over the age of eighteen and competent to make this declaration. Swear under penalty of
16 perjury of the State of Washington and the United States of America the following
17 declaration to be true and correct to the best of my ability and the attached documents marked
18 as exhibits to be true and correct documents unaltered and/or unmodified in any way.

19 Signed this 1st day of May, 2014, in the City of Mill Creek, County of Snohomish,
20 State of Washington.

21 
Christopher J. Hupy, Pro Se

EXHIBIT

A

Electronic Messages (Email) Between Plaintiff and
KCPAO Thomas Kuffel

[Print](#)[Close](#)

RE: Lawsuit against King County Superior Court Judges Perfection of Service

From: **Kuffel, Thomas** (Thomas.Kuffel@kingcounty.gov)

Sent: Wed 4/30/14 9:26 AM

To: 'Christopher Hupy' (amakirkland@hotmail.com)

Mr. Hupy,

The PAO does represent King county superior court judges in lawsuits brought against them in their official capacity. In lieu of personal service on the judges in this matter, we will accept service of the pleadings, via email, on their behalf. You may email the summons and complaint to me. I will acknowledge receipt by confirming email—I do have a few meetings today and may not be able to respond immediately.

I won't know who will be handling the case until after we've reviewed the complaint. Once that decision is made, the assigned attorney will file and serve an NOA.

Very truly yours,

Tom Kuffel

Senior Deputy Prosecuting

From: Christopher Hupy [mailto:amakirkland@hotmail.com]

Sent: Tuesday, April 29, 2014 4:50 PM

To: Tom Kuffel; Kuffel, Thomas

Cc: Craighead, Susan; Robinson, Palmer; Sherfey, Paul; Ridge, Linda; Satterberg, Dan; Wright, Kevin; Christopher Hupy / SCJA

Subject: Lawsuit against King County Superior Court Judges Perfection of Service

Importance: High

Mr. Kuffel and King County Prosecutors Office,

I will be filing a lawsuit against the KCSC Judges' (in their professional capacity) tomorrow morning in Snohomish County, based on the judicial interference in perfecting service I experienced back in 2011 I am reaching out in advance.

If the King County Prosecutor is going to represent these Judicial actors AND is willing to provide a Written Notice of Appearance I will be willing to serve your office, otherwise starting tomorrow late morning I will have process servers going from Courtroom to Courtroom at Seattle and RJC serving these defendants, my expectation is that these happen in a professional manner and no attempts by the Judicial Officers to evade service and/or interfere with process of service happen. I will not be attempting to serve ANY judge at their home it will all be at their place of work.

I will not be utilizing the King County Sheriff again for service, these will be private citizens and/or professional process service providers.

Please email me back by 10 am tomorrow and I will provide the Cause number, also if you wish to enter into an agreement to provide electronic (email) service I would be open to that as well.

Email response to this is requested, preferred, and expected.

With all due respect,

Christopher J. Hupy

PO Box 12655
Everett, WA 98206

(503) 931-4991

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EXHIBIT

B

Washington State BAR Lawyer Directory Webpage
for KCPAO Thomas Kuffel

King County Employee Detail webpage for KCPAO
Thomas Kuffel


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Thomas William Kuffel

WSBA Number: 20118
Admit Date: 11/13/1990
Member Status: Active
Public/Mailing Address: Office of the Prosecuting Attorney
 500 4th Ave Ste 900
 Seattle, WA 98104-2316
 United States
Phone: (206) 296-0430
Fax: (206) 296-0415
TDD:
Email: thomas.kuffel@kingcounty.gov
Website:

Practice Information

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Firm or Employer: Office of the Prosecuting Attorney
Firm Size: Not Specified
Practice Areas: None Specified
Other Languages Spoken: None Specified

Liability Insurance

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Private Practice: No
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Member of these committees/boards/panels:
 None

Disciplinary History

No Public Disciplinary History

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SERVICES GROUPS EMPLOYEES

Employee Detail

Name: Tom Kuffel

Title: Supervising Attorney - Contracts

Group: PAO - Civil Division

Email: tom.kuffel@kingcounty.gov

Mail Stop: ADM-PA-0900

Primary Phone: 206-296-0430

Fax: 206-296-0191

Reports To: Kevin Wright

Primary Location: King County Administration Building
500 Fourth Ave Ste 900
Seattle, WA 98104

