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9	SUPERIOR COURT OF WASHINGTON FOR KING COUNTY			
10	PAUL BRECHT,) NO.			
11	Plaintiff,			
12	V.)			
13	JANE FRANCES HAGUE a/k/a JANE			
14	HAGUE SPRINGMAN, CHARLES EDWARD) SUMMONS (20/60 DAYS) SPRINGMAN, MADISON COMMUNICATIONS)			
15	CORPORATION, BRETT BADER, and JEFFREY DAVIS,)			
16	Defendants.			
17				
18	TO THE DEFENDANTS, JANE FRANCES HAGUE a/k/a JANE HAGUE			
19	SPRINGMAN, CHARLES EDWARD SPRINGMAN, MADISON COMMUNICATIONS			
20	CORPORATION, BRETT BADER, and JEFFREY DAVIS:			
21	A lawsuit has been started against you in the above entitled court by PAUL BRECHT,			
22	Plaintiff. Plaintiff's claim is stated in the written Complaint, a copy of which is served upon you			
23	with this Summons.			
24	In order to defend against this lawsuit, you must respond to the complaint by stating your			
25	defense in writing, and by serving a copy upon the person signing this summons within 20 days			
26	(60 days if served outside the State of Washington) after the service of this summons, excluding			
27	the day of service, or a default judgment may be entered against you without notice. A default			
28				
	SUMMONS (20/60 DAYS) RICHARD L. POPE, JR. Attorney, AtLaw			

judgment is one where the plaintiff is entitled to what he asks for because you have not responded. If you serve a notice of appearance on the undersigned person, you are entitled to notice before a default judgment may be entered.

You may demand that the plaintiff file this lawsuit with the court. If you do so, the demand must be in writing and must be served upon the person signing this summons. Within 14 days after you serve the demand, the plaintiff must file this lawsuit with the court, or the service on you of this summons and complaint will be void.

If you wish to seek the advice of an attorney in this matter, you should do so promptly so that your written response, if any, may be served on time.

This summons is issued pursuant to Rule 4 of the Superior Court Civil Rules of the State of Washington.

Dated: Otaber 29,200

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Signed:

RICHARD L. POPĚ, JJK. WSBA # 21118 Attorney for Plaintiff

SERVE A COPY OF YOUR ANSWER ON PLAINTIFF'S ATTORNEY AT:

> Richard L. Pope, Jr. 1839 – 151st Avenue, S.E. Bellevue, Washington 98007 Tel: (425) 747-4463

SUMMONS (20/60 DAYS) Page 2 RICHARD L. POPE, JR. Attorney-At-Law 1839 – 151st Avenue, S.E. Bellevue, WA 98007 Tel: (425) 747-4463

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8	SUPERIOR COURT OF WASHI	NGTON FOR KING COUNTY			
9	PAUL BRECHT,) NO.			
10	Plaintiff,				
11	V.)			
12	JANE FRANCES HAGUE a/k/a JANE HAGUE SPRINGMAN, CHARLES EDWARD))) COMPLAINT FOR DAMAGES			
13 14	SPRINGMAN, CHARLES EDWARD SPRINGMAN, MADISON COMMUNICATIONS CORPORATION, BRETT BADER, and JEFFREY DAVIS,				
15	Defendants.)			
16)			
17	Parti	ies			
18	1. Plaintiff PAUL BRECHT is a resid	ent of King County, Washington.			
19	2. Defendants JANE FRANCES HAC	UE a/k/a JANE HAGUE SPRINGMAN,			
20	CHARLES EDWARD SPRINGMAN, BRETT BA	ADER, and JEFFREY DAVIS are believed to			
21	be residents of King County, Washington.				
22	3. Defendant MADISON COMMUNICATIONS CORPORATION is a Washington				
23	corporation with its principal place of business in King County, Washington.				
24	Jurisdiction and Venue				
25	4. This court has proper venue and jurisdiction as the Plaintiff and the Defendants are				
26	residents of King County, Washington and the actions complained of herein, or some of them				
27	occurred in whole or in part in King County, Washington.				
28	COMPLAINT FOR DAMAGES	RICHARD L. POPE, JR. Attorney-At-Law			
	Page 1	1839 – 151 st Avenue, S.E.			

 County Council. This income would be community income and Defendant Hague's continued service on the King County Council would provide other benefits to the marital community. The marital community of Defendants Hague and Springman is liable for the torts committed herein. 8. Defendant MADISON COMMUNICATIONS CORPORATION ("Madison") is a campaign consulting firm working for Defendant Hague's re-election campaign. Defendant Madison is believed to have assisted Defendant Hague with the production and distribution of the defamatory communication for which Plaintiff is suing the Defendants. 9. Defendants BRETT BADER ("Bader") and JEFFREY DAVIS ("Davis") are believed to be the principal owners and officers of Defendant Madison and are believed to have assisted Defendants. 10. On or about October 26, 2007, Defendant Hague mailed out an 8-1/2" x 11" campaign brochure intended to promote her re-election to the King County Council. This 	1	Basis of Claim				
 election to that position in the November 6, 2007 general election. 6. Defendant CHARLES EDWARD SPRINGMAN ("Springman") is the husband of Defendant Hague. 7. The actions relevant to this lawsuit were done in order to promote the re-election of Defendant Hague and provide continued income for Defendant Hague as a member of the King County Council. This income would be community income and Defendant Hague's continued service on the King County Council would provide other benefits to the marital community. The marital community of Defendants Hague and Springman is liable for the torts committed herein. 8. Defendant MADISON COMMUNICATIONS CORPORATION ("Madison") is a campaign consulting firm working for Defendant Hague's re-election campaign. Defendant Madison is believed to have assisted Defendant Hague with the production and distribution of the defamatory communication for which Plaintiff is suing the Defendants. 9. Defendants BRETT BADER ("Bader") and JEFFREY DAVIS ("Davis") are believed to be the principal owners and officers of Defendant Madison and are believed to have assisted Defendants Hague and Madison with the production and distribution of the defamatory communication for which Plaintiff is suing the Defendants. 10. On or about October 26, 2007, Defendant Hague mailed out an 8-1/2" x 11" campaign brochure intended to promote her re-election to the King County Council. This campaign brochure was received by numerous people, including voters and residents of District 6 of the King County Council, on or about October 27, 2007. Exhibit A is a true and correct copy of the campaign brochure in question. Plaintiff is unsure of the number, but would estimate that Defendant Hague mailed between 25,000 and 50,000 copies of the campaign brochure. 11. Defendant Hague's campaign brochure contained a partial copy	2	5. Defendant JANE FRANCES HAGUE a/k/a JANE HAGUE SPRINGMAN				
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	26	11. Defendant Hague's campaign brochure contained a partial copy and criticism of a				
28	27	campaign brochure her election opponent Richard Pope had previously mailed out to voters.				
COMPLAINT FOR DAMAGES RICHARD L. POPE, JR.	28	COMPLAINT FOR DAMAGES RICHARD L POPE IR				

Page 2

1 12. In Mr. Pope's previous campaign brochure, Plaintiff had been quoted as saying: 2 "People are always saying: 'why can't we get more decent, capable and honest leaders in politics' - here's our chance - vote for Richard Pope." - Paul Brecht, Bellevue Businessman. 3 4 13. Defendant Hague circled Plaintiff's name in red (Paul Brecht, Bellevue 5 Businessman) on her campaign brochure, and drew an arrow to a statement she made about 6 Plaintiff, in which Defendant Hague alleged the following defamatory statement about Plaintiff: 7 Paul Brecht tops Pope's endorsement list. Brecht also tops law enforcement list with multiple domestic violence arrests and at least one assault conviction. (Washington Courts 8 Case Record Search) 9 14. Plaintiff has never been convicted of assault, and no "Washington Courts Case Record Search" would reveal an assault conviction, since no such conviction ever happened. 10 11 15. Plaintiff is also not on the top of any "law enforcement list" of any sort for any reason. This false claim is especially defamatory in the context that Defendant Hague is making 12 false allegations of an assault conviction against Plaintiff in the very same sentence. 13 16. The statements made about Plaintiff above by Defendant Hague were false and 14 15 unprivileged, and made intentionally with actual knowledge of their falsity, with reckless 16 disregard as to their truth or falsity, or negligently without due care and caution. Plaintiff has suffered injury and damage as a result of these defamatory statements. Defendant Hague is 17 therefore liable to Plaintiff for the tort of defamation and libel. 18 17. 19 The marital community of Defendants Hague and Springman are also liable to 20 Plaintiff for defamation, as this tort was committed for the benefit of the marital community. 21 18. Defendants Madison, Bader and Davis would also be liable to Plaintiff for the tort 22 of defamation and libel, if they assisted Defendant Hague in the production and distribution of 23 this defamatory publication and acted with the requisite knowledge, recklessness or negligence. 19. 24 Defendant Hague (and by extension, the marital community of Defendants Hague and Springman) has respondeat superior liability for the actions of any "staff", employees, or 25 26 other agents acting on behalf of Defendant Hague in connection with this defamatory publication, 27 including but not limited to Defendants Madison, Bader and Davis.

COMPLAINT FOR DAMAGES Page 3

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1	20. Defendant Madison has respondeat superior liability for the actions of any "staff",
2	employees, or other agents acting on behalf of Defendant Madison in connection with this
3	defamatory publication, including but not limited to Defendants Bader and Davis.
4	
5	Prayer for Relief
6	Wherefore Plaintiff prays for judgment against the Defendants as follows:
7	1. Monetary damages in such an amount as may be determined in future proceedings
8	or in such an amount as may be awarded at trial.
9	2. Reasonable attorney fees, expenses, and costs of this action.
10	3. All other general and equitable relief that may be just or appropriate.
11	
12	Respectfully submitted this 29th day of October 2007.
13	
14	$\Omega \wedge i \circ \Omega$
15	Kicha 2 Opent
16	WSBA # 21118
17	Attorney for Plaintiff
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28	COMPLAINT FOR DAMAGES RICHARD L. POPE, JR.
1	COMPLAINT FOR DAMAGES Page 4 RICHARD L. POPE, JR. Attorney-At-Law 1839 – 151 st Avenue, S.E.

Attorney-At-Law 1839 – 151st Avenue, S.E. Bellevue, WA 98007 Tel: (425) 747-4463

EXHIBIT A

Pope was never a King County Prosecutor. In fact, Pope fought to restrain the late King County Prosecutor Norm Maleng from arresting him. Case No. 97-2-20394-3

other criminal cases

for the last 20 years - very act Resident of King County -CALLS SCHOOL SHOP

prosecution of drunk driving and

said he did not endorse Pope and "I do not want to be When told he'd been featured in a mailer, Prof. Kummert responsible for putting Richard Pope in public

and is under investigation by the Washington State times, fined thousands of dollars for misconduct "closing down his law practice" because it was "no Bar Association. Pope told a Judge in 2005 he was Richard Pope has been sanctioned by Judges six

onger a viable way to make a living."

In ShawCause

Richard Pope has run for office ten times and lost overwhelmingly. Pope's been consistently rated as "NOT QUALIFIED"

PAID THE ALT POPE MAILER IS A CLEAR ATTEMPT TO DECEIVE VOTERS

office." (10/16/2007)

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Paid for by Friends of Jane Hague (GOP) + 14150 NE 20th Street, #303 + Bellevue, WA 98007

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Law Enforcement - Protected the public safety as Dept

Government - Assisted with the Sheriff and Corrections Officer.

"people are always saying: "why can't we get more decent, capable and " honest leaders in pentics - here's our chance - vote for Alchard Pope." -Richard Pope was one of the smartest students I've seen in 32

Paul Brecht tops Pope's endorsement list. Brecht also tops

law enforcement's list with multiple domestic violence

arrests and at least one assault conviction.

(Washington Courts Case Record Search)

Professor Richard Kummert, University of Washington School of Law

interested in my situation. He worked tirelessly to protect my rights. rope recently represented me in a legal matter. He wa

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Active in Church - Surderl Rhoda Mutongwizo Lee, Seattle Business Woman

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the candidates	 Rated "NOT QUALIFIED" by the non-partisan Municipal League of King County. 	 Not Endorsed by any Community Organization. His own Party overwhelmingly Refused to Endorse him. 	 Fined Thousands of Dollars by Judges. Sanctioned by multiple Courts. 	 Under Investigation by Washington State Bar Association for "Unprofessional Conduct". 	Two Restraining Orders issued for Threats of Violence against a Woman .		
Compare the	Rated "OUTSTANDING" by the non-partisan Municipal League of King County.	 Endorsed by Democrats, Republicans and Independents across the Eastside. Named 2006 "Legislator of the Year" by the Alliance of Eastside Agencies. 	Named "Children's Champion" by Kirkland/ Redmond Boys and Girls Club.	Recipient of the Martin Luther King, Jr. Humanitarian Award.	Honored by the Trust for Public Lands for Preserving Vital Open Space. Endorsed by Eastside Business Alliance and the Affordable Housing Council.	"Jane Hague has been a trusted friend of Eastside families and neighborhoods for over twenty years. She's earned my respect and my vote."	Catherine Morgan, Eastside mother of three

Case Number:07-2-34389-0Case Title:PAUL BRECHT vs JANE FRANCES HAGUE aka JANE HAGUE SPRINGMAN,CHARLES EDWARD SPRINGMAN, et al.Document Title:SUMMONS & COMPLAINTUser's Name:Richard PopeFiled Date:10/29/2007 1:30:41 PM

User Signed

Richard Pope
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