

1 Hearing Date: March 2, 2018 at 9:00 am
2 Presiding: Honorable Michael P. Price
3 Place: Department 5
4 Address: Spokane County Court House
1116 W. Broadway Avenue
5 Spokane, WA 99260
6

7 IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON

8 IN AND FOR THE COUNTY OF SPOKANE

9 STEPHEN KERR EUGSTER,

10 Petitioner,

11 v.

12 PAULA C. LITTLEWOOD, Executive
13 Director of the WASHINGTON STATE
14 BAR ASSOCIATION in her official
15 capacity, and the WASHINGTON STATE
BAR ASSOCIATION,

16 Respondents.
17

No. 17-2-04631-5

RESPONDENTS' MOTION TO
DISMISS


18 Pursuant to Civil Rule 12(b), Respondents the Washington State Bar Association and its
19 Executive Director Paula Littlewood move to dismiss the Petition of Stephen Kerr Eugster
20 ("Eugster") with prejudice on three independent grounds. First, the Petition fails to state a valid
21 claim for which relief can be granted. Second, Eugster failed to exhaust his administrative
22 remedies. Finally, Eugster's claims are barred under the doctrine of res judicata. Because
23 further amendment would be futile, the Petition should be dismissed with prejudice.
24

25 This motion is based on the records and file herein and Respondents' Memorandum of
26 Authorities in Support of Motion to Dismiss and in Opposition to Motion for Summary
27

1 Judgment.

2 DATED this 31st day of January, 2018.

3
4 PACIFICA LAW GROUP LLP

5
6 By 
7 Jessica A. Skelton, WSBA #36748
8 Taki V. Flevaris, WSBA #42555

9 Attorneys for Respondents