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UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF THE STATE OF WASHINGTON

ABRAHAM MEYER, an individual  
Plaintiff,

v.

CITY OF CHEHALIS, a Washington  
municipality,  
Defendant.

**CASE NO. 3:22-cv-05008**

**COMPLAINT**

**JURY DEMAND**

**I. PARTIES, JURISDICTION AND VENUE**

1.1 Plaintiff, Abraham Meyer (“Mr. Meyer”), is an individual residing in Lewis County, Washington.

1.2 Defendant City of Chehalis (“City”) is a Washington municipality.

1.3 This Court has original jurisdiction in this matter pursuant to 28 U.S.C. §1331.

1           1.4     Venue is proper in the United States District Court for the Western District of the  
2 State of Washington pursuant to 28 U.S.C. §1391.

3  
4                                   **II.     FACTUAL ALLEGATIONS**

5           2.1     On February 27, 2017, the City hired Mr. Meyer as a firefighter.

6           2.2     In October of 2018, Mr. Meyer began bringing his dog with him for his 24-hour  
7 work shifts at the fire station.

8           2.3     Mr. Meyer would kennel his dog at the fire station before going out on a call, and  
9 had no issues meeting expectations with respect to response time.

10           2.4     On December 30, 2018, then Captain Casey Beck and then firefighter, now Captain  
11 Steve Emrich verbally assaulted Mr. Meyer, telling him that “people with service dogs don’t  
12 belong in the fire service.”

13           2.5     On January 7, 2019, Mr. Meyer brought his dog to work.

14           2.6     On January 10, 2019, Mr. Meyer informed City Human Resources Director Judy  
15 Schave about the verbal assault and discriminatory statements, reported that he had a disability  
16 and was requesting a reasonable accommodation to be allowed to bring his dog to the fire station.  
17

18           2.7     During the meeting on January 10, 2019, Mr. Meyer disclosed to Ms. Schave that  
19 he had post-traumatic stress disorder (“PTSD”), that the presence of the dog at the fire station  
20 provided support and comfort to him during downtimes, and that he needed this accommodation  
21 to function as an effective firefighter on an ongoing basis.  
22

23           2.8     At the time of Mr. Meyer’s reasonable accommodation request, the City did not  
24 have a policy statement or procedure regarding reasonable accommodation of employees with  
25 disabilities as required by WAC 357-26-020.  
26

1           2.9     At the time of Mr. Meyer’s reasonable accommodation request, the City did not  
2 provide Mr. Meyer with access to any reasonable accommodation procedure.

3           2.10    On January 11, 2019, the Fire Chief Ken Cardinale issued a written reprimand to  
4 Mr. Meyer for bringing his dog to work.

5           2.11    On that same date, the City placed Mr. Meyer on paid administrative leave status.

6           2.12    In a letter dated January 14, 2019, Mr. Schave stated that the purpose of the leave  
7 was to provide the City with “an opportunity to arrange for an evaluation of you by a qualified  
8 health care provider who can assess your current fitness to perform the essential functions of your  
9 position.”

10          2.13    Upon information and belief, the City took no steps to schedule the fitness for duty  
11 evaluation referenced in Ms. Schave’s January 14 letter.

12          2.14    Instead, on February 7, 2019, Ms. Schave wrote to Mr. Meyer requesting a medical  
13 certification affirming Mr. Meyer’s need for a reasonable accommodation.

14          2.15    On March 18, 2019, Mr. Meyer provided the City with the requested certification  
15 from Dr. Charles McGill, M.D.

16          2.16    Dr. McGill’s certification confirmed the specific benefits that Mr. Meyer’s service  
17 dog provided to Mr. Meyer that mitigated the impacts of his PTSD, described the presence of the  
18 dog as an integral piece of Mr. Meyer’s care plan and indicated that for Mr. Meyer: “Having a  
19 Service dog is a better treatment than medication.”

20          2.17    The City did not accept Dr. McGill’s certification and instead, on March 28, 2019,  
21 directed Mr. Meyer to attend a fitness for duty exam with Dr. David M. Corey, a forensic  
22 psychologist.

1           2.18    On April 23, 2019, Mr. Meyer attended the fitness for duty examination with Dr.  
2 Corey.

3           2.19    Dr. Corey confirmed that Mr. Meyer has “PTSD that is typically well managed  
4 through effective self-care, which includes the use of a service animal.”

5           2.20    Significantly, Dr. Corey noted that Mr. Meyer’s symptoms are “not of a magnitude  
6 that is currently job-limiting. However, as the ADA Amendments Act stipulates, some medical  
7 disorders ‘may constitute substantially limiting impairments if they are substantially limiting when  
8 active or have a high likelihood of recurrence in substantially limiting forms’ (EEOC, 1997/2009,  
9 at Question 8). PTSD is such a condition.”

10           2.21    In response to the question as to whether Mr. Meyer requires a reasonable  
11 accommodation in order to perform the essential functions of his job, Dr. Corey responded as  
12 follows:  
13

14                   As Dr. McGill stated in his letter, dated March 18, 2019, Mr. Meyer is “highly  
15 functional” in spite of his mental health condition. In part, this is a function of his  
16 use of a service animal. From a clinical perspective, continued use of his service  
17 animal would be reasonably expected to aid him in continuing to perform the  
18 essential functions of his position. I can imagine that Mr. Meyer’s request for this  
19 accommodation would require considerable preparatory work on the part of the  
20 employer, presuming that it is not rejected as posing an undue hardship. As part of  
the interactive process of exploring this request, I would encourage Mr. Meyer in  
helping to develop or refine a written policy that address the range of issues unique  
to the work of an emergency first responder.

21           2.22    The City posed follow-up questions to Dr. Corey, one of which related to Mr.  
22 Meyer’s ability to perform the essential functions of the position without the assistance of a service  
23 animal to which Dr. Corey responded that: “It is my opinion that Mr. Meyer can perform the  
24 essential functions of his position without the assistance of a service animal, although in the  
25  
26

1 absence of an alternative accommodation with comparable advantages, I suspect that his symptoms  
2 may eventually lead to a point where he would not be able to perform them.”

3 2.23 In its May 23, 2019 letter to Mr. Meyer, Ms. Schave mischaracterized Dr. Corey’s  
4 opinion, stating that: “It is Dr. Corey’s professional opinion that you can perform the essential  
5 functions of your position without the assistance of a service animal; however, other  
6 techniques/accommodations could help you manage the symptoms that you may experience with  
7 your Post Traumatic Stress Disorder (PTSD) over the long term.”

8  
9 2.24 Mr. Meyer’s PTSD is an impairment that has a substantially limiting effect on his  
10 ability to perform his job and, if not properly managed, limits Mr. Meyer’s access to equal benefits,  
11 privileges or terms or conditions of employment.

12 2.25 Mr. Meyer put the City on notice of the existence of his impairment, and medical  
13 documentation establishes a reasonable likelihood that engaging in job functions without the  
14 requested reasonable accommodation would aggravate the impairment to the extent that it would  
15 create a substantially limiting effect.

16  
17 2.26 Rather than engage in the interactive process with Mr. Meyer over the issues that  
18 might need to be addressed with respect to granting his requested accommodation of having his  
19 dog present at the fire station, the City denied Mr. Meyer’s requested accommodation and directed  
20 him to identify other alternative accommodations.

21  
22 2.27 There are no other alternative accommodations that provide comparable  
23 advantages.

24 2.28 Despite Mr. Meyer’s repeated requests that the City grant his reasonable  
25 accommodation request as supported by Dr. McGill and Dr. Corey, the City refused to engage  
26

1 with Mr. Meyer in any interactive process about the reasonable accommodation as requested, and  
2 instead continued to insist that Mr. Meyer find alternative accommodations for his PTSD.

3       2.29 On or around June 14, 2019, Robin L Nielsen provided her summary of findings of  
4 investigation to the City (“the Nielsen report”). In the Nielsen report, Ms. Nielsen concluded that  
5 Fire Chief Cardinale did not have a reasonable basis to avoid interviewing Firefighter Meyer  
6 before imposing the January 11, 2019 written reprimand. Ms. Nielsen also concluded, that “it is  
7 more likely than not that, given his frustration with Firefighter Meyer, it was not appropriate for  
8 Chief Cardinale to conduct the investigation.”

9  
10       2.30 The Nielsen report also noted that: “I find that it is more likely than not that some  
11 of the concerns that Firefighter Meyer raised about how he has been treated appear to have some  
12 validity. Specifically, Chief Cardinale takes the position that he can treat Firefighter Meyer  
13 differently than other firefighters and Chief Cardinale appears to have done so. In addition, in  
14 some cases, the Chief did not follow the law (payment of overtime) or use best practices in  
15 conducting an investigation in Firefighter Meyer’s conduct.”

16  
17       2.31 Despite these findings, the City did not take steps to remedy or address the Fire  
18 Chief’s identified improper and discriminatory treatment, and did not provide a copy of the Nielsen  
19 report to Mr. Meyer for several months.

20       2.32 On July 17, 2019, the City directed Mr. Meyer to return to work on August 2, 2019  
21 without his requested accommodation because “there does not appear to be a medical necessity for  
22 a service animal as an accommodation for your disability.” In the same letter, the City reiterated  
23 that it was only willing to engage in dialogue about “other means of accommodating your  
24 disability.”  
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1           2.33    In its May 23, 2019 letter, and in its July 17, 2019, letter, the City did not take the  
2 position that Mr. Meyer’s requested reasonable accommodation would cause an undue hardship to  
3 the City.

4           2.34    As of August 2, 2019, Mr. Meyer was not prepared to return to work and began  
5 using sick leave and vacation time as he sought a resolution.

6           2.35    On September 5, 2019, Mr. Meyer filed a charge of discrimination with the  
7 Washington State Human Rights Commission (“WSHRC”) which also served as a charge with the  
8 Equal Employment Opportunity Commission (“EEOC”).

9           2.36    From approximately October 9, 2019 through November 15, 2019, Mr. Meyer  
10 voluntarily attended inpatient treatment for PTSD at the IAFF Center of Excellence.

11           2.37    On or about December 15, 2019, the City denied Mr. Meyer’s donated leave  
12 request, even though it had granted donated leave requests to other City employees.

13           2.38    On or about January 5, 2020, the City denied Mr. Meyer the ability to use vacation  
14 in lieu of sick leave although it had granted such use in the past.

15           2.39    On or about January 13, 2020, Mr. Meyer returned to work for the City.

16           2.40    At significant personal cost to himself, Mr. Meyer has been continuing to serve as  
17 a firefighter for the City.

18           2.41    Mr. Meyer’s ability to function as a firefighter is diminished because of the City’s  
19 refusal to grant his reasonable accommodation request, resulting in Mr. Meyer using higher levels  
20 of paid leave, decreased ability to work overtime, incurring additional medical costs, and causing  
21 additional unnecessary stress and emotional distress because of the lack of support that his  
22 employer demonstrates with respect to his disability and need for accommodation.  
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1           2.42 As a result of the City’s ongoing violations of the law, Mr. Meyer has suffered  
2 extensive economic and non-economic damages.

3           2.43 On or about September 13, 2021, Mr. Meyer presented the required tort claim to  
4 the City.

5           2.44 On or about October 11, 2021, the City and Mr. Meyer entered into a tolling  
6 agreement that provided that, for statute of limitations purposes, any complaint filed before  
7 February 28, 2022, would be regarded as if it had been filed on December 1, 2021.

8           2.45 On or about December 3, 2021, the EEOC issued its Notice of Right to Sue Letter  
9 to Mr. Meyer relating to Mr. Meyer’s charge of discrimination.  
10

11  
12                                   **III. FIRST CAUSE OF ACTION**  
13           **Disability Discrimination and Failure To Provide Reasonable Accommodation**  
14                                   **Americans With Disabilities Act**  
15                                   **42 U.S.C. § 12112**

16           3.1 Plaintiff realleges paragraphs 1.1 through 2.42 as though fully set forth herein.

17           3.2 Defendant’s actions and/or omissions constitute violations of the Americans With  
18 Disabilities Act, 42 U.S.C. § 12112 (“ADA”) as the City has repeatedly discriminated against Mr.  
19 Meyer as a qualified individual on the basis of his disability including, without limitation, its  
20 ongoing failure to provide a reasonable accommodation as required by law.

21           3.3 As a result of Defendant’s violations of the law, Plaintiff has been damaged in an  
22 amount to be proven at trial.

23                                   **IV. SECOND CAUSE OF ACTION**  
24           **Disability Discrimination and Failure To Provide Reasonable Accommodation**  
25                                   **Washington Law Against Discrimination**  
26                                   **RCW 49.60.180**

          4.1 Plaintiff realleges paragraphs 1.1 through 4.3 as though fully set forth herein.



1           4.2     Defendant’s actions and/or omissions constitute a violation of the Washington Law  
2 Against Discrimination (“WLAD”), RCW 49.60.180, as the City has repeatedly discriminated  
3 against Mr. Meyer as a qualified individual on the basis of his disability, including without  
4 limitation its ongoing failure to provide a reasonable accommodation as required by law.

5           4.3     As a result of Defendant’s violations of the law, Plaintiff has been damaged in an  
6 amount to be proven at trial.

7  
8                                   **V.     THIRD CAUSE OF ACTION**  
9   **Retaliation**  
10    **Americans With Disabilities Act**  
11    **42 U.S.C. § 12203**

12           5.1     Plaintiff realleges paragraphs 1.1 through 4.3 as though fully set forth herein.

13           5.2     Defendant’s actions and/or omissions constitute retaliation and/or interference,  
14 coercion or intimidation against Plaintiff because he opposed acts and practices made unlawful by  
15 the ADA including without limitation filing a charge of discrimination and participating in the  
16 investigation of that charge of discrimination. This constitutes a violation of 42 U.S.C. § 12203.

17           5.3     As a result of Defendant’s violations of the law, Plaintiff has been damaged in an  
18 amount to be proven at trial.

19  
20                                   **VI.    FOURTH CAUSE OF ACTION**  
21   **Retaliation**  
22    **Washington Law Against Discrimination**  
23    **RCW 49.60.210**

24           6.1     Plaintiff realleges paragraphs 1.1 through 5.3 as though fully set forth herein.

25           6.2     Defendant’s actions and/or omissions constitute retaliation and/or interference,  
26 coercion or intimidation against Plaintiff because he opposed acts and practices made unlawful by

1 the WLAD including without limitation filing a charge of discrimination and participating in the  
2 investigation of that charge of discrimination. This constitutes a violation of RCW 49.60.210.

3 6.3 As a result of Defendant's violations of the law, Plaintiff has been damaged in an  
4 amount to be proven at trial.

5  
6 **JURY DEMAND**

7 Pursuant to Federal Rule of Civil Procedure 38, Plaintiff hereby demands a trial by jury of  
8 all issues.

9  
10 **PRAYER FOR RELIEF**

11 WHEREFORE, Plaintiff respectfully requests that this Court enter an order granting the  
12 following relief:

13 1. An order finding that Defendant discriminated against Plaintiff because of his  
14 disability in violation of the ADA, 42 U.S.C. § 12112 and the WLAD, RCW 49.60.180;

15 2. Declaratory and/or injunctive relief requiring Defendant to provide Plaintiff the  
16 reasonable accommodation as requested and as supported by the medical documentation;

17 3. Granting Plaintiff an award of damages for all forms of economic losses and non-  
18 economic losses, including without limitation specific damages and general damages for mental  
19 anguish, emotional distress, and pain and suffering in an amount to be proven at trial;

20 4. An order granting Plaintiff his reasonable attorney's fees and costs pursuant to  
21 RCW 49.60.030(2), 42 U.S.C § 12205 and 42 U.S.C. § 12117 in an amount to be proven at trial;

22 5. Punitive damages pursuant to 42 U.S.C. § 1981a(b)(1);

23 6. Pre-judgment and post-judgment interest under the above referenced statutes; and  
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1 7. Such other and further relief as the Court deems just and equitable.  
2

3 RESPECTFULLY SUBMITTED this 7<sup>th</sup> day of January, 2022.  
4

VANGUARD LAW, LLC  
5

6 By /s/ Spencer Nathan Thal

Spencer Nathan Thal, WSBA 20074

Vanguard Law, LLC

PO Box 939

Poulsbo WA 98370

Telephone: (206) 488-8344

Facsimile: (360) 626-1919

Email: [spencer@vanguardlawfirm.com](mailto:spencer@vanguardlawfirm.com)

*Attorney for Plaintiff*  
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12 By /s/ Zachariah Nathan William Thal

Zachariah Nathan William Thal, WSBA 55462

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*Attorney for Plaintiff*  
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CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

I. (a) PLAINTIFFS
Abraham Meyer, an individual
(b) County of Residence of First Listed Plaintiff Lewis
(c) Attorneys (Firm Name, Address, and Telephone Number)
Spencer Thal and Zachariah Thal, Vanguard Law, PO Box 939, Poulsbo WA 98370; (206) 488-8344

DEFENDANTS
City of Chehalis, a Washington municipality
County of Residence of First Listed Defendant
NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.
Attorneys (If Known)

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)
1 U.S. Government Plaintiff
2 U.S. Government Defendant
3 Federal Question (U.S. Government Not a Party)
4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)
PTF DEF
Citizen of This State 1 1
Citizen of Another State 2 2
Citizen or Subject of a Foreign Country 3 3
Incorporated or Principal Place of Business In This State 4 4
Incorporated and Principal Place of Business In Another State 5 5
Foreign Nation 6 6

IV. NATURE OF SUIT (Place an "X" in One Box Only) Click here for: Nature of Suit Code Descriptions.

Table with columns: CONTRACT, REAL PROPERTY, TORTS, CIVIL RIGHTS, PRISONER PETITIONS, FORFEITURE/PENALTY, LABOR, IMMIGRATION, BANKRUPTCY, SOCIAL SECURITY, FEDERAL TAX SUITS, OTHER STATUTES. Includes codes like 110 Insurance, 310 Airplane, 365 Personal Injury, etc.

V. ORIGIN (Place an "X" in One Box Only)
1 Original Proceeding
2 Removed from State Court
3 Remanded from Appellate Court
4 Reinstated or Reopened
5 Transferred from Another District (specify)
6 Multidistrict Litigation - Transfer
8 Multidistrict Litigation - Direct File

VI. CAUSE OF ACTION
Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):
42 U.S.C. 12112 and 42 U.S.C. 12203
Brief description of cause:
Disability Discrimination in Employment

VII. REQUESTED IN COMPLAINT:
CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P. DEMAND \$
CHECK YES only if demanded in complaint:
JURY DEMAND: [X] Yes [ ] No

VIII. RELATED CASE(S) IF ANY (See instructions):
JUDGE DOCKET NUMBER

DATE: 1/7/2022
SIGNATURE OF ATTORNEY OF RECORD: /s/ Spencer Nathan Thal

FOR OFFICE USE ONLY
RECEIPT # AMOUNT APPLYING IFP JUDGE MAG. JUDGE

**INSTRUCTIONS FOR ATTORNEYS COMPLETING CIVIL COVER SHEET FORM JS 44**

## Authority For Civil Cover Sheet

The JS 44 civil cover sheet and the information contained herein neither replaces nor supplements the filings and service of pleading or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. Consequently, a civil cover sheet is submitted to the Clerk of Court for each civil complaint filed. The attorney filing a case should complete the form as follows:

- I.(a) Plaintiffs-Defendants.** Enter names (last, first, middle initial) of plaintiff and defendant. If the plaintiff or defendant is a government agency, use only the full name or standard abbreviations. If the plaintiff or defendant is an official within a government agency, identify first the agency and then the official, giving both name and title.
- (b) County of Residence.** For each civil case filed, except U.S. plaintiff cases, enter the name of the county where the first listed plaintiff resides at the time of filing. In U.S. plaintiff cases, enter the name of the county in which the first listed defendant resides at the time of filing. (NOTE: In land condemnation cases, the county of residence of the "defendant" is the location of the tract of land involved.)
- (c) Attorneys.** Enter the firm name, address, telephone number, and attorney of record. If there are several attorneys, list them on an attachment, noting in this section "(see attachment)".
- II. Jurisdiction.** The basis of jurisdiction is set forth under Rule 8(a), F.R.Cv.P., which requires that jurisdictions be shown in pleadings. Place an "X" in one of the boxes. If there is more than one basis of jurisdiction, precedence is given in the order shown below.  
 United States plaintiff. (1) Jurisdiction based on 28 U.S.C. 1345 and 1348. Suits by agencies and officers of the United States are included here. United States defendant. (2) When the plaintiff is suing the United States, its officers or agencies, place an "X" in this box.  
 Federal question. (3) This refers to suits under 28 U.S.C. 1331, where jurisdiction arises under the Constitution of the United States, an amendment to the Constitution, an act of Congress or a treaty of the United States. In cases where the U.S. is a party, the U.S. plaintiff or defendant code takes precedence, and box 1 or 2 should be marked.  
 Diversity of citizenship. (4) This refers to suits under 28 U.S.C. 1332, where parties are citizens of different states. When Box 4 is checked, the citizenship of the different parties must be checked. (See Section III below; **NOTE: federal question actions take precedence over diversity cases.**)
- III. Residence (citizenship) of Principal Parties.** This section of the JS 44 is to be completed if diversity of citizenship was indicated above. Mark this section for each principal party.
- IV. Nature of Suit.** Place an "X" in the appropriate box. If there are multiple nature of suit codes associated with the case, pick the nature of suit code that is most applicable. Click here for: [Nature of Suit Code Descriptions](#).
- V. Origin.** Place an "X" in one of the seven boxes.  
 Original Proceedings. (1) Cases which originate in the United States district courts.  
 Removed from State Court. (2) Proceedings initiated in state courts may be removed to the district courts under Title 28 U.S.C., Section 1441.  
 Remanded from Appellate Court. (3) Check this box for cases remanded to the district court for further action. Use the date of remand as the filing date.  
 Reinstated or Reopened. (4) Check this box for cases reinstated or reopened in the district court. Use the reopening date as the filing date.  
 Transferred from Another District. (5) For cases transferred under Title 28 U.S.C. Section 1404(a). Do not use this for within district transfers or multidistrict litigation transfers.  
 Multidistrict Litigation – Transfer. (6) Check this box when a multidistrict case is transferred into the district under authority of Title 28 U.S.C. Section 1407.  
 Multidistrict Litigation – Direct File. (8) Check this box when a multidistrict case is filed in the same district as the Master MDL docket.  
**PLEASE NOTE THAT THERE IS NOT AN ORIGIN CODE 7.** Origin Code 7 was used for historical records and is no longer relevant due to changes in statute.
- VI. Cause of Action.** Report the civil statute directly related to the cause of action and give a brief description of the cause. **Do not cite jurisdictional statutes unless diversity.** Example: U.S. Civil Statute: 47 USC 553 Brief Description: Unauthorized reception of cable service.
- VII. Requested in Complaint.** Class Action. Place an "X" in this box if you are filing a class action under Rule 23, F.R.Cv.P.  
 Demand. In this space enter the actual dollar amount being demanded or indicate other demand, such as a preliminary injunction.  
 Jury Demand. Check the appropriate box to indicate whether or not a jury is being demanded.
- VIII. Related Cases.** This section of the JS 44 is used to reference related pending cases, if any. If there are related pending cases, insert the docket numbers and the corresponding judge names for such cases.

**Date and Attorney Signature.** Date and sign the civil cover sheet.

AO 440 (Rev. 06/12) Summons in a Civil Action

UNITED STATES DISTRICT COURT

for the

Western District of Washington



ABRAHAM MEYER, an Individual

Plaintiff(s)

v.

CITY OF CHEHALIS, a Washington municipality,

Defendant(s)

Civil Action No. 3:22-cv-05008

SUMMONS IN A CIVIL ACTION

To: (Defendant's name and address)

Mayor Dennis Dawes
City of Chehalis
350 North Market Blvd, Room 101
Chehalis WA 98532

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

Spencer Nathan Thal
Zachariah Nathan William Thal
Vanguard Law
PO Box 939
Poulsbo WA 98370

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

CLERK OF COURT

Date:

Signature of Clerk or Deputy Clerk

Civil Action No. 3:22-cv-05008

**PROOF OF SERVICE**

*(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (l))*

This summons for *(name of individual and title, if any)* \_\_\_\_\_  
was received by me on *(date)* \_\_\_\_\_ .

I personally served the summons on the individual at *(place)* \_\_\_\_\_  
\_\_\_\_\_ on *(date)* \_\_\_\_\_ ; or

I left the summons at the individual's residence or usual place of abode with *(name)* \_\_\_\_\_  
\_\_\_\_\_, a person of suitable age and discretion who resides there,  
on *(date)* \_\_\_\_\_ , and mailed a copy to the individual's last known address; or

I served the summons on *(name of individual)* \_\_\_\_\_ , who is  
designated by law to accept service of process on behalf of *(name of organization)* \_\_\_\_\_  
\_\_\_\_\_ on *(date)* \_\_\_\_\_ ; or

I returned the summons unexecuted because \_\_\_\_\_ ; or

Other *(specify)*:

My fees are \$ \_\_\_\_\_ for travel and \$ \_\_\_\_\_ for services, for a total of \$ \_\_\_\_\_ 0.00 \_\_\_\_\_ .

I declare under penalty of perjury that this information is true.

Date: \_\_\_\_\_

\_\_\_\_\_  
*Server's signature*

\_\_\_\_\_  
*Printed name and title*

\_\_\_\_\_  
*Server's address*

Additional information regarding attempted service, etc: