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**THE SUPERIOR COURT OF THE STATE OF WASHINGTON
IN AND FOR THE COUNTY OF KING**

ELIZABETH A. CAMPBELL, an)
individual,)

Plaintiff,)

vs.)

LARS CHRISTIAN MATTHIESEN, and)
YARA H. O. SILVA, individually, and)
the marital community thereof,)
PATRICK C. FOSSEY, and MARIA F.)
OLIVARES FLORES, individually,)
and the marital community thereof,)
RACHEL LUSBY, an individual,)
HIGHLAND HOLDINGS, INC. a)
corporation d.b.a. HIGHLAND RERIG-)
ERATION et al D/B/A's thereof, and.)
PEP Properties, L.L.C., a limited liability)
corporation,)

Defendants.)

NO.

COMPLAINT FOR NEGLIGENCE
AND DAMAGES
(Demand for Jury Trial)

- 1) Violation of the Video Privacy Protection Act, 18 U.S.C. § 2710, et seq.;
- 2) Violation of the Electronic Communications Privacy Act, 18 U.S.C. § 2510, et seq.;
- 3) Violation of the Stored Communications Act, 18 U.S.C. § 2701, et seq.;
- 4) Civil Recovery For Criminal Act
- 5) Violation of SMC 12A.06.100, SMC 12A.10.150
- 6) Invasion of Privacy
- 7) Intrusion Upon Seclusion
- 8) False Light
- 9) Publication Disclosure of Private Facts
- 10) Defamation
- 11) Fraud
- 12) Tortious Interference with Business Expectancy-Employment
- 13) Tortious Interference with Contract
- 14) Breach of Contract
- 15) Conversion
- 16) Intentional Infliction of Emotional Distress
- 17) Negligent Infliction of Emotional Distress

1 COMES NOW Plaintiff Elizabeth A. Campbell (“Plaintiff”) and complains and alleges as
2 follows:

3 I. PARTIES

4 1.1 Plaintiff Elizabeth A. Campbell, at the time of the acts and omissions alleged
5 herein, and at all times relevant herein, Plaintiff was a resident of King County, in the state of
6 Washington, and is a single person under the laws of the State of Washington. Her residential
7 address is 3826 24th Avenue W., Seattle, WA 98199.

8 1.2 Defendants Lars Christian Matthiesen and Yara H. O. Silva, at the time of the
9 acts and omissions alleged herein, and at all times relevant herein, Defendants Matthiesen
10 and Silva were residents of Snohomish County, in the state of Washington, were spouses,
11 and constituted a marital community under the laws of the State of Washington. Defendant
12 Matthiesen is sued in his individual capacity along with his marital community. Defendant
13 Silva is sued in her individual capacity along with her marital community. All acts
14 performed by one are performed for and on behalf of the other and the marital community.
15 Their residential address is 1200 Highland Drive, Edmonds, WA 98020.

16 1.3 Defendants Patrick C. Fossey and Maria Francisca Olivares Flores *aka*
17 Francisca Olivares, at the time of the acts and omissions alleged herein, and at all times
18 relevant herein Defendants Fossey and Olivares were residents of King County, in the state
19 of Washington, were spouses, and constituted a marital community under the laws of the
20 State of Washington. Defendant Fossey is sued in his individual capacity along with his
21 marital community. Defendant Flores/Olivares is sued in her individual capacity along with
22 her marital community. All acts performed by one are performed for and on behalf of the
23 other and the marital community. Their residential address is 20041 10th Avenue NW,
24 Shoreline, WA 98177.

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1 1.4 Defendant Rachel Lusby, at the time of the acts and omissions alleged herein,
2 and at all times relevant herein, Plaintiff was a resident of King County, in the state of
3 Washington, and is a single person under the laws of the State of Washington. Her
4 residential address is 14428 46th Avenue S, Tukwila, WA 98168.

5 1.5 Highland Holdings, Inc., at the time of the acts and omissions alleged herein,
6 and all times relevant herein Defendant Highland Holdings, Inc. (hereinafter “Highland”)
7 was doing business under an assumed name, Highland Refrigeration (hereinafter referred to
8 interchangeably with Highland Holdings, Inc. as “Highland”), and other d/b/a’s. Highland is
9 a corporation organized and existing under the laws of the State of Washington and doing
10 business in including but not limited to Snohomish County and King County, Washington,
11 and other locales, nationally and internationally. It is incorporated in Seattle, King County in
12 the State of Washington. It’s registered agent is Defendant Silva; its corporate address is
13 4520 24th Avenue West, Seattle, Washington 98199.

14 1.6 PEP Properties L.L.C., at the time of the acts and omissions alleged herein, and
15 all times relevant herein Defendant PEP Properties L.L.C. (hereinafter “PEP”) is a limited
16 liability corporation organized and existing under the laws of the State of Washington and
17 doing business in including but not limited to Snohomish County and King County,
18 Washington, and other locales, nationally and internationally. It is incorporated in Seattle,
19 King County in the State of Washington. It’s registered agent is Defendant Silva; its
20 corporate address is 4520 24th Avenue West, Seattle, Washington 98199.

21 1.6 Plaintiff does not know the true names and capacities of the defendants named in
22 this action, JANE DOES and JOHN DOES 1-10, inclusive (collectively “Defendants” or
23 “DOE Defendants”), and they are therefore sued by such fictitious names. This Complaint
24 will be amended to allege their true names and capacities when they have been ascertained.
25 Plaintiff is informed and believes, and based thereon alleges that such fictitiously-named

1 defendants and each of them are responsible in some manner for the occurrences alleged, and
2 that Plaintiff's damages were proximately caused by their conduct.

3 II. JURISDICTION

4 Jurisdiction is proper in this Court under RCW 4.12.025 (3), RCW 4.12.025 (1), RCW
5 4.12.025 (1)(d), and RCW 4.12.025 (3)(d); and RCW 2.08.010.

6 III. VENUE

7 3.1 At all times relevant herein, Plaintiff was a resident of King County, in the state of
8 Washington.

9 3.2 At all times relevant herein Defendants Lars Christian Matthiesen (hereinafter
10 "Lars") and Yara H.O. Silva (hereinafter "Ms. Silva") were residents of Snohomish County,
11 in the state of Washington.

12 3.3 At all times relevant herein Defendants Patrick C. Fossey (hereinafter "Mr.
13 Fossey" and Maria Francisca Olivares Flores *aka* Francisca Olivares (hereinafter "Ms.
14 Flores") were residents of King County, in the state of Washington.

15 3.4 At all times relevant herein, Defendant Lusby was a resident of King County, in the
16 state of Washington.

17 3.5 At all times relevant herein Defendant Highland's corporate residence is in King
18 County; at all times relevant herein its registered agent and the person upon whom process
19 for the corporation may be served, Ms. Silva, resides in Snohomish County.

20 3.6 At all times relevant herein Defendant PEP's corporate residence is in King County;
21 at all times relevant herein its registered agent and the person upon whom process for the
22 corporation may be served, Ms. Silva, resides in Snohomish County.

23 3.6 All acts and/or omissions alleged herein occurred in King County and Snohomish
24 County, in the state of Washington, and in Denmark.

1 3.7 Accordingly, pursuant to RCW 4.12.025 (3) and RCW 4.12.025 (1) this action is
2 brought in the county in which two of the defendants, Defendants Matthiesen and Silva,
3 reside at the time of the commencement of this action, in Edmonds, Snohomish County, state
4 of Washington; and pursuant to RCW 4.12.025 (1)(d) where the person resides upon whom
5 process may be served upon the corporation - Defendant Silva is the registered agent for
6 Highland Holdings and PEP Properties and lives in Edmonds, Snohomish County.

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