

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

FILED
04 JUL 15 PM 4:15
KING COUNTY
SUPERIOR COURT CLERK
SEATTLE, WA

IN THE SUPERIOR COURT OF WASHINGTON
IN AND FOR KING COUNTY

STANLEY F. AMBRAMSKI, KAREN
DOLDE, LEE R. HOLT, JANIESE A.
LOEKEN, DIANNE M. PRATT,
ALMA M. ROLFS, AUDREY TODD,
and MARCIA WESLEY,

Plaintiffs,

v.

PRIMARY BEHAVIORAL HEALTH
NETWORK, INC. and PHILIP
HIRSCH, and "JANE DOE" HIRSCH,

Defendants.

04.2.17204.7 SEA
NO.

SUMMONS (20 DAY)

MARY E. ROBERTS

THE STATE OF WASHINGTON

TO: The above-named defendants

A lawsuit has been started against you in the above-entitled court by plaintiffs,
Stanley F. Ambramski, Karen Dolde, Lee R. Holt, Janiese A. Loeken, Dianne M. Pratt,
Alma M. Rolfs, Audrey Todd, and Marcia Wesley. Plaintiffs' claim is stated in the
written complaint, a copy of which is served upon you with this summons.

ORIGINAL

PEIZER, RICHARDS & ZIONTZ, P.S.
1915 PACIFIC BUILDING
720 THIRD AVENUE
SEATTLE, WASHINGTON 98104-1825
PHONE (206) 682-7700 FAX (206) 682-0721

1 In order to defend against this lawsuit, you must respond to this complaint by
2 stating your defense in writing, and serve a copy upon the person signing this summons
3 within 20 days after the service of the summons, excluding the day of service, or a
4 default judgment may be entered against you without notice. A default judgment is one
5 where plaintiff is entitled to what they ask for because you have not responded. If you
6 serve a notice of appearance on the undersigned person, you are entitled to notice before
7 a default judgment may be entered.
8

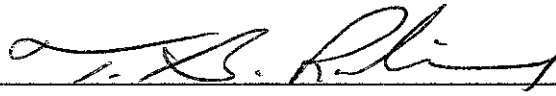
9
10
11 You may demand that the plaintiffs file this lawsuit with the court. If you do so,
12 the demand must be in writing and must be served upon the person signing this
13 summons. Within 14 days after you serve the demand, the plaintiff must file this lawsuit
14 with the court, or the service on you of the summons and complaint will be void.
15

16 If you wish to seek the advice of an attorney in this matter, you should do so
17 promptly so that your written response, if any, may be served on time.
18

19 THIS SUMMONS is issued pursuant to Rule 4 of the Superior Court Civil Rules
20 of the State of Washington.
21

22 DATED this 12 day of July, 2004.

23 PEIZER, RICHARDS & ZIONTZ, P.S.
24

25 By: 
26 Thomas G. Richards #6264
27 Attorney for plaintiffs
28

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

FILED

04 JUL 15 PM 4:15

KING COUNTY
SUPERIOR COURT CLERK
SEATTLE, WA

IN THE SUPERIOR COURT OF WASHINGTON
IN AND FOR KING COUNTY

STANLEY F. ABRAMSKI, KAREN
DOLDE, LEE R. HOLT, JANIESE A.
LOEKEN, DIANNE M. PRATT,
ALMA M. ROLFS, AUDREY TODD,
and MARCIA WESLEY,

Plaintiffs,

v.

PRIMARY BEHAVIORAL HEALTH
NETWORK, INC. and PHILIP
HIRSCH, and "JANE DOE" HIRSCH,

Defendants.

NO. 04.2.17204.7 SEA

COMPLAINT FOR UNPAID
WAGES AND FOR DAMAGES

MARY E. ROBERTS

COME NOW the plaintiffs by and through their attorney Thomas G. Richards of Peizer Richards and Ziontz, P.S. and claim damages against defendants as follows:

1. At all times material hereto, plaintiffs Stanley F. Abramski, Karen Dolde, Lee R. Holt, Janiese A. Loeken, Dianne M. Pratt, Alma M. Rolfs, Audrey Todd, and Marcia Wesley have been residents of King County, Washington.

2. At all times material hereto, defendant Primary Behavior Health Network,

ORIGINAL

COMPLAINT FOR UNPAID WAGES AND
FOR DAMAGES - 1

H:\8179\Complaint.wpd

PEIZER, RICHARDS & ZIONTZ, P.S.
1915 PACIFIC BUILDING
720 THIRD AVENUE
SEATTLE, WASHINGTON 98104-1825
PHONE (206) 682-7700 FAX (206) 682-0721

1 Inc., is a Washington state corporation doing business in King County, state of
2 Washington. Defendants Philip Hirsch and "Jane Doe" Hirsch are residents of King
3 County, Washington.
4

5 3. Jurisdiction and venue are in this court.

6
7 4. Plaintiffs have been employees and independent contractors working for
8 defendants.

9 5. Defendants have failed to pay wages to plaintiffs when said wages are due
10 and owing.

11
12 6. All of the plaintiffs are entitled to the benefits of Washington state law
13 concerning employees whether they worked as a full time employee, part time employee,
14 or contractor for defendant PBHN.

15
16 7. Stanley F. Abramski has been an employee of PBHN. The employer,
17 PBHN, has unlawfully deprived said employee of wages, and other benefits in the
18 amount for the purposes of this pleading of \$11,100.00.

19
20 8. Karen Dolde has been an employee of PBHN. The employer, PBHN, has
21 unlawfully deprived Karen Dolde of a part of her wages, and other benefits, which for
22 this purposes of this pleading is alleged to be \$5,362.00.

23
24 9. Janiese A. Loeken has been an employee of PBHN. The employer, PBHN,
25 has unlawfully deprived Janiese Loeken of a part of her wages, and other benefits, which
26 for the purposes of this pleading is alleged to be the sum of \$36,908.00.
27
28

1 10. Lee R. Holt has been an employee of PBHN. The employer, PBHN, has
2
3 deprived Lee Holt of a part of her wages, and other benefits, which for the purposes of
4 this pleading is alleged to be the amount of \$5,000.00.

5 11. Dianne M. Pratt has been an employee of PBHN. The employer, PBHN,
6
7 has unlawfully deprived Dianne Pratt of a portion of her wages, and other benefits,
8 which for the purposes of this pleading is alleged to be the sum of \$9,000.00.

9 12. Alma M. Rolfs has been an employee of PBHN. The employer, PBHN,
10
11 has unlawfully deprived Alma Rolfs of a portion of her wages, and other benefits, which
12 for the purposes of this pleading is alleged to be the amount of \$5,300.00.

13 13. Audrey Todd has been an employee of PBHN. The employer, PBHN, has
14
15 unlawfully deprived Audrey Todd of a portion of her wages, and other benefits, which
16 for the purposes of this pleading is alleged to be the amount of \$2,328.00.

17 14. Marcia Wesley has been an employee of PBHN. The employer, PBHN,
18
19 has unlawfully deprived Marcia Wesley of a portion of her wages, and other benefits,
20 which for the purposes of this pleading is alleged to be the amount of \$17,000.00.

21 15. PBHN and Philip Hirsch have violated RCW 49.52.050 by willfully and
22
23 with intent to deprive employees of part of their wages by failing to pay wages in
24 accordance with the terms and conditions of employment.

25 16. PBHN and Philip Hirsch and "Jane Doe" Hirsch are liable for twice the
26
27 amount of wages unlawfully withheld, together with the cost of suit, and reasonable
28

1 attorney fees, pursuant to RCW 49.52.070.

2
3 17. Philip Hirsch and "Jane Doe" Hirsch are personally liable and jointly and
4 severally liable with PBHN for the claims herein due to Hirschs' ownership of PBHN
5 and failure to observe corporate formalities, thus allowing plaintiffs to pierce the
6 corporate veil.
7

8 Wherefore, plaintiffs pray as follows:

9
10 1. For an award of damages equal to wages withheld, which for the purposes
11 of this pleading, is alleged to be the amount of \$91,998.00.

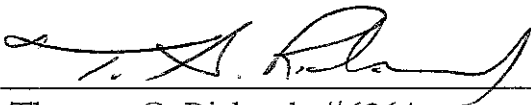
12 2. For double damages pursuant to RCW 49.52.070 in the amount of
13 \$91,998.00.
14

15 3. For their costs of suit.

16 4. For reasonable attorney fees, against the defendants jointly and severally.
17

18 DATED this 12 day of July, 2004.

19 PEIZER, RICHARDS & ZIONTZ, P.S.

20
21 By: 
22 Thomas G. Richards #6264
23 Attorney for plaintiffs
24
25
26
27
28