

August 31 2023 12:15 PM

CONSTANCE R. WHITE  
COUNTY CLERK  
NO: 23-2-09415-3

IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON  
IN AND FOR THE COUNTY OF PIERCE

ARAVIA ASSET MANAGEMENT, L.L.C.  
Plaintiff,

NO.

vs.

COMPLAINT FOR UNLAWFUL  
DETAINER

CHLOE ALEXIS JENKINS  
Defendant(s).  
# 29015.0046

COMES NOW the plaintiff and states:

I

Plaintiff, as landlord, rented to defendant(s), the premises commonly known as ARAVIA APARTMENTS, 2222 BROOKDALE ROAD EAST #F-206, TACOMA, PIERCE County, Washington.

II

The rent for the premises is \$1,654.00 per month, or \$55.13 per day payable in advance, and defendant(s) is/are in actual possession of the premises. The rental agreement provides for late charges if rent is not paid by the due date.

III

A 30-Day Notice to Pay Rent or Vacate, for rent in the amount of \$12,368.30 was served on the defendant(s) on May 11, 2023. Rents for June 2023 and July 2023 are also due and owing. A copy of said notice is attached as Exhibit A.

COMPLAINT FOR UNLAWFUL DETAINER -1

**PUCKETT & REDFORD PLLC**

901 Fifth Avenue, Suite 800  
SEATTLE, WASHINGTON 98164  
TELEPHONE: (206) 386-4800  
FACSIMILE: (206) 233-8166

ORIGINAL

IV

Defendant(s) failed to pay the rent or vacate the described premises within the time required by the notice and thus is/are unlawfully detaining the same.

WHEREFORE, plaintiff prays for judgment as follows:

1. For restitution of the premises and the issuance of an order issuing a writ of restitution;
2. For forfeiture of defendant(s) tenancy;
3. For judgment against defendant(s) for unlawful detainer in the amount of rent and other charges owing at the time of the judgment;
4. For plaintiff's reasonable attorneys' fees;
5. For an order that defendant(s) shall not be allowed back in the rental premises, or any part of the property that the rental premises is a part of, including common areas, after either the execution of the writ of restitution and return of the property to Plaintiff or the voluntary vacation of the rental premises by defendant(s) prior to the enforcement of the writ of restitution, without management's prior written consent.
6. For such other and further relief as the court may deem just and proper.

PUCKETT & REDFORD PLLC

DATED: August 11, 2023

By: /s/ Randy Redford  
Randy Redford/WSBA No. 21529  
Tom M. Morningstar//WSBA No. 44245  
Attorneys for Plaintiff

### 30-DAY NOTICE TO PAY RENT OR VACATE THE PREMISES

TO: Chloe Jenkins, and all others residing at  
ADDRESS: 2222 Brookdale Rd E #F206, Tacoma, WA 98445

You are receiving this notice because the landlord alleges you are not in compliance with the terms of the lease agreement by failing to pay rent and/or utilities and/or recurring or periodic charges that are past due.

**(1) Monthly rent due for (list month(s)):**

11/2022, 12/2022, 01/2023, 02/2023, 03/2023, 04/2023, 05/2023

**\$ 11,015.50**

**AND/OR**

**(2) Utilities due for (list month(s)):**

11/2022, 12/2022, 01/2023, 02/2023, 03/2023, 04/2023, 05/2023

**\$ 872.80**

**AND/OR**

**(3) Other recurring or periodic charges identified in the lease for (list month(s)):**  
**(Master Policy and Carport) 11/2022, 12/2022, 01/2023, 02/2023, 03/2023, 04/2023,**  
**05/2023**

**\$480.00**

**TOTAL AMOUNT DUE:**

**\$12,368.30**

**Note - payment must be made pursuant to the terms of the rental agreement or by electronic means including but not limited to, cashier's check, money order, or other certified funds.**

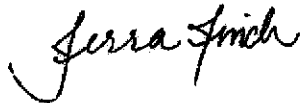
You must pay the total amount due to your landlord within thirty (30) days after service of this notice or you must vacate the premises. Any payment you make to the landlord must first be applied to the total amount due as shown on this notice. Any failure to comply with this notice within thirty (30) days after service of this notice may result in a judicial proceeding that leads to your eviction from the premises.

The Washington state Office of the Attorney General has this notice in multiple languages as well as information on available resources to help you pay your rent, including state and local rental assistance programs, on its web site at [www.atg.wa.gov/landlord-tenant](http://www.atg.wa.gov/landlord-tenant).

Exhibit A

State law provides you the right to legal representation and the court may be able to appoint a lawyer to represent you without cost to you if you are a qualifying low-income renter. If you believe you are a qualifying low-income renter and would like an attorney appointed to represent you, please contact the Eviction Defense Screening Line at 855-657-8387 or apply online at <http://nwjustice.org/apply-online>. For additional resources, call 2-1-1 or the Northwest Justice Project CLEAR Hotline outside of King County (888) 201-1014 weekdays between 9:15 am – 12:15 pm, or (888) 387-7111 for seniors (age 60 and over). You may find additional information to help you at <http://www.washingtonlawhelp.org>. Free or low cost mediation services to assist in non-payment of rent disputes before any judicial proceedings occur are also available at dispute resolution centers throughout the state. You can find your nearest dispute resolution center at <https://www.resolutionwa.org>. State law also provides you the right to receive interpreter services at court.

OWNER/LANDLORD:



DATE: May 11, 2023

WHERE TOTAL AMOUNT DUE IS TO BE PAID:

Aravia Apartments

2300 Brookdale Rd E, Tacoma, WA 98445

## INFORMATION ABOUT RESPONDING TO LAWSUIT

WE ARE THE ATTORNEYS FOR THE LANDLORD THAT HAS ASKED US TO BEGIN AN EVICTION LAWSUIT AGAINST YOU.

YOU HAVE BEEN SERVED WITH AN EVICTION SUMMONS AND A COMPLAINT.

THE SUMMONS TELLS YOU WHAT YOU MUST DO IF YOU WANT TO DEFEND YOURSELF.

**OUR OFFICE DOES NOT ACCEPT TELEPHONIC NOTICES OF APPEARANCES, EMAIL NOTICES OF APPEARANCE OR TELEPHONIC ANSWERS TO THE LAWSUIT.**

**IF YOU WANT TO DEFEND YOURSELF YOU MUST RESPOND IN WRITING TO OUR OFFICE.**