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3 KING COUNTY
4 SUPERIOR COURT CLERK
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6 CASE #: 18-3-05993-7 SEA

7 **IN THE SUPERIOR COURT OF WASHINGTON FOR KING COUNTY**

8 SONYA DELANCE,

9 Petitioner,

NO. 18-3-05993-7 SEA

**MOTION FOR JUDGMENT AND
ORDER TO PAY**

10 v.

11 MICHAEL DELANCE,

12 Respondent.

13 ALLIANCEBERNSTEIN L.P.,

14 Garnishee Respondent.
15

16
17 Pursuant to RCW 6.27.250, Petitioner / Judgment Creditor requests the Court enter, ex
18 parte, a Judgment on Answer and Order to Pay directing the Garnishee Respondent to pay the
19 Petitioner / Judgment Creditor through the registry of the Court the funds as outlined on the
20 Garnishee Respondent's Answer on file herein, in the amount of \$99,779.65 in satisfaction of the
21 Writ of Garnishment with AllianceBernstein L.P. on file herein.
22

23 **FACTS**

24 On July 20, 2021, this Court issued a Writ of Garnishment (Debts Other Than on Earnings)
25 to AllianceBernstein L.P. against Respondent, Michael DeLance. The Garnishee Respondent was
26

1 served with the Writ of Garnishment on July 26, 2021. On August 16, 2021, AllianceBernstein
2 L.P. submitted their Answer to the Writ. AllianceBernstein L.P. will be garnishing funds in the
3 amount of **\$99,779.65**, payable to Petitioner / Judgment Creditor in satisfaction of the Writ.

4 **AUTHORITY**

5 Garnishee Respondent has answered that it is indebted to the Respondent in the non-exempt
6 amount of Two Million Four Hundred Eighty-Six Thousand Three Hundred Sixty Dollars
7 (\$2,486,360.00), which is more than the amount owing on the Writ. RCW 6.27.250 permits
8 Petitioner to “apply for the judgment and order to pay ex parte” so long as there is no unresolved
9 exemption claim and no pending controversion. There is no unresolved exemption claim and no
10 pending controversion as of the time of this motion. Petitioner / Judgment Creditor is now entitled
11 to entry of a Judgment on Answer and Order to Pay. A proposed order is submitted herewith.

12 Dated this 16th day of September, 2021 at Edmonds, Washington.

13
14 **BERESFORD BOOTH PLLC**

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16
17 By: 

18 Anne B. Bennette, WSBA No. 50240
19 Attorneys for Petitioner

20 “I certify that this memorandum contains 301
21 words, in compliance with the Local Civil
22 Rules.”