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IN THE CIRCUIT COURT FOR THE STATE OF OREGON
IN AND FOR THE COUNTY OF DESCHUTES

WELLS FARGO BANK, N.A., its successors in
interest and/or assigns,

Plaintiff,

v.

UNKNOWN HEIRS OF RICHARD L.
VALENZUELA; NANCY GREEN, AS
AFFIANT OF THE ESTATE OF RICHARD L.
VALENZUELA AKA NANCY GREEN;
RICHARD L. VALENZUELA, JR. AKA
RICHARD L VALENZUELA JR AKA
RICHARD L VALENZUELA JR; ANDREW
SHANE HOLLAWAY VALENZUELA;
RENEE ROBINSON; BROOK VALENZUELA;
SEAN A. JOHNSON; THERESA EVENS;
ROMAINE VILLAGE HOME
HOMEOWNER'S ASSOCIATION; STATE OF
OREGON; OCCUPANTS OF THE PREMISES;
AND THE REAL PROPERTY LOCATED AT
19652 HILLER DRIVE, BEND, OREGON
97702,

Defendants.

Case No.14CV0860FC

WRIT OF EXECUTION IN
FORECLOSURE

TO: THE SHERIFF OF DESCHUTES COUNTY, OREGON

1.

WHEREAS, on July 20, 2017, in the above-entitled court, a General Judgment of
Foreclosure (the "Judgment") was entered and docketed in the above-entitled cause.

2.

NOW, THEREFORE, IN THE NAME OF THE STATE OF OREGON, you are hereby commanded to sell, in the manner prescribed by law for the sale of real property upon execution (subject to redemption), all of the interest which the defendants had on 6/6/2011 12:00:00 AM, the date of the foreclosed Deed of Trust, and also all of the interest which the defendants had thereafter, in the real property described in the Judgment to satisfy the amount due to Plaintiff, set out as follows:

Lenders' Principal Judgment

Unpaid Principal Balance	\$133,023.14
Pre-Judgment Interest from November 1, 2011 to April 18, 2017, the date calculated by the declarant in the declaration of indebtedness @ 4.750% per annum.	\$34,520.04
Lenders' Fees and Costs	\$12,973.99
Attorneys' Fees and Costs	\$15,481.25
<i>Total Amount Due to Plaintiff as of Judgment Submission Date</i>	\$195,998.42

Additional Pre-Judgment Interest

Accrued Interest from April 19, 2017 through July 20, 2017, the date of entry of the general judgment @ 4.750% per annum (\$17.31 per diem).	\$1,609.83
<i>Total Amount Due to Plaintiff as of Judgment Entry Date</i>	\$197,608.25

Post Judgment Interest

Accrued Post Judgment Interest from July 21, 2017, the date after the entry of the general judgment, through October 18, 2017, the date the Writ was requested @ legal rate of interest of 9.000% per annum (\$48.73 per diem).	\$4,336.97
<i>Total Amount Due to Plaintiff as of Date of Writ</i>	\$201,945.22

3.

In addition to this amount, Plaintiff is entitled to the continued accrual of post-judgment

1 interest at the legal rate of interest of 9.000% per annum, \$48.73 per diem from October 19,
2 2017, to the date the real property subject to the Judgment is sold by the Deschutes County
3 Sheriff at its foreclosure auction, plus costs of this writ, sheriff's fees and sale costs, and all other
4 recoverable costs pursuant to law.

6 4.

7 The real property subject to this writ of execution is situated in Deschutes County, State of
8 Oregon, to wit:

9 LOT 5, BLOCK 23, ROMAINE VILLAGE UNIT 9, CITY OF
10 BEND, DESCHUTES COUNTY OREGON.

<u>Used</u>	<u>1978</u>	<u>Silvercrest</u>	
New/Used	Year	Manufacturer's Name	
			061 x 036
			Length x
			Width
<u>A4SC351OR</u>	<u>B4SC351OR</u>	<u>C4SC351OR</u>	
Serial No.	Serial No.	Serial No.	Serial
No.			

17 THE HOME SHALL BE ANCHORED TO THE LAND BY
18 ATTACHMENT TO A PERMANENT FOUNDATION,
19 CONSTRUCTED IN ACCORDANCE WITH APPLICABLE
20 STATE AND LOCAL BUILDING COES AND
21 MANUFACTOER'S SPECIFICATIONS IN A MANNER
22 SUFFICIENT TO VALIDATE ANY APPLICABLE
23 MANUFACTURER'S WARRANTY, AND PERMANENTLY
24 CONNECTED TO APPROPRIATE RESIDENTIAL UTILITIES
(E.G., WATER, GAS, ELECTRICITY, SEWER)
25 ("PERMANENTLY AFFIXED"). THE HOMEOWNER INTENDS
26 THAT THE HOME BE AN IMMOVEABLE FIXTURE AND
PERMANENT IMPROVEMENT TO THE LAND.

and more commonly known as 19652 Hiller Drive, Bend, OR 97702-9028, ("Property").

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The Judgment Creditor's name and address is:

Wells Fargo Bank, N.A.
c/o Wells Fargo Bank, N.A.
Attention: Bankruptcy Department MAC #D3347-014
Fort Mill SC 29715

6.

The Judgment Creditor's name and address for the purpose of this Writ is:

Wells Fargo Bank, N.A.
c/o RCO Legal, P.C.
511 SW 10th Ave., Ste. 400
Portland, OR 97205
(503) 977-7840

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1 THEREFORE, in the name of the State of Oregon, you are hereby commanded to seize and
2 sell the above-described Property, in the manner prescribed by law; or so much thereof as may be
3 necessary to satisfy the Judgment, including interest, fees and costs.

4 MAKE RETURN HEREOF within 60 days after you receive this writ.

Signed: 10/26/2017 12:16 PM



Trial Court Administrator Jeffrey E. Hall



12 Submitted By:

13  Date: 10/18/17

14 Calvin Knickerbocker, OSB #050110
15 Attorneys for Plaintiff
16 511 SW 10th Ave., Ste. 400
17 Portland, OR 97205
18 (503) 977-7840; Fax (503) 977-7963
19 cknickerbocker@rcolegal.com

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IN THE CIRCUIT COURT FOR THE STATE OF OREGON
IN AND FOR THE COUNTY OF DESCHUTES

WELLS FARGO BANK, N.A., its successors in interest and/or assigns,

Plaintiff,

v.

UNKNOWN HEIRS OF RICHARD L. VALENZUELA; NANCY GREEN, AS AFFIANT OF THE ESTATE OF RICHARD L. VALENZUELA AKA NANCY GREEN; RICHARD L. VALENZUELA, JR.; ANDREW SHANE HOLLAWAY VALENZUELA; RENEE ROBINSON; BROOK VALENZUELA; SEAN A. JOHNSON; THERESA EVENS; ROMAINE VILLAGE HOME HOMEOWNER'S ASSOCIATION; STATE OF OREGON; AND OCCUPANTS OF THE PREMISES;

Defendants.

Case No. 14CV0860FC

GENERAL JUDGMENT OF FORECLOSURE AND SALE AGAINST:

- (1) UNKNOWN HEIRS OF RICHARD L. VALENZUELA;
- (2) NANCY GREEN, AS AFFIANT OF THE ESTATE OF RICHARD L. VALENZUELA AKA NANCY GREEN;
- (3) RICHARD L. VALENZUELA, JR.;
- (4) ANDREW SHANE HOLLAWAY VALENZUELA;
- (5) RENEE ROBINSON;
- (6) BROOK VALENZUELA;
- (7) SEAN A. JOHNSON;
- (8) THERESA EVENS;
- (9) ROMAINE VILLAGE HOME HOMEOWNER'S ASSOCIATION;
- (10) STATE OF OREGON; and
- (11) OCCUPANTS OF THE PREMISES

1.

THIS MATTER coming regularly before the Court on this day and it appearing from the record herein that plaintiff Wells Fargo Bank, N.A., its successors in interest and/or assigns ("Plaintiff"), filed its First Amended Complaint for deed of trust foreclosure and declaratory relief; that the

1 defendants Unknown Heirs of Richard L. Valenzuela; Nancy Green, as Affiant of the Estate of Richard
2 L. Valenzuela aka Nancy Green; Richard L. Valenzuela, Jr.; Andrew Shane Hollaway Valenzuela;
3 Renee Robinson; Brook Valenzuela; Sean A. Johnson; Theresa Evens; Romaine Village Home
4 Homeowner's Association; and State of Oregon were duly served with the Summons and Complaint as
5 required by law; that defendants Unknown Heirs of Richard L. Valenzuela; Nancy Green, as Affiant of
6 the Estate of Richard L. Valenzuela aka Nancy Green; Richard L. Valenzuela, Jr.; Andrew Shane
7 Hollaway Valenzuela; Renee Robinson; Brook Valenzuela; Sean A. Johnson; Theresa Evens; Romaine
8 Village Home Homeowner's Association; State of Oregon and Occupants of the Premises failed to
9 appear; and that an Order of Default has been filed concurrently with this Judgment, and, consequently
10 this General Judgment of foreclosure is submitted in accordance with UTCR 5.100 (3)(c)(A).
11

12 2.
13

14 Plaintiff hereby requests this general judgment for foreclosure and sale be entered into the
15 Court's register to accomplish the following: to foreclose any and all interest of defendants Unknown
16 Heirs of Richard L. Valenzuela; Nancy Green, as Affiant of the Estate of Richard L. Valenzuela aka
17 Nancy Green; Richard L. Valenzuela, Jr.; Andrew Shane Hollaway Valenzuela; Renee Robinson;
18 Brook Valenzuela; Sean A. Johnson; Theresa Evens; Romaine Village Home Homeowner's
19 Association; State of Oregon and Occupants of the Premises in the real property subject to this
20 foreclosure action, located at 19652 Hiller Drive, Bend, OR 97702-9028 (the "Property").
21

22 3.

23 The court being fully advised in the Premise, finding good cause exists so this general judgment
24 of foreclosure and sale may be entered in favor of Plaintiff and against defendants Unknown Heirs of
25 Richard L. Valenzuela; Nancy Green, as Affiant of the Estate of Richard L. Valenzuela aka Nancy
26

1 Green; Richard L. Valenzuela, Jr.; Andrew Shane Hollaway Valenzuela; Renee Robinson; Brook
2 Valenzuela; Sean A. Johnson; Theresa Evens; Romaine Village Home Homeowner's Association; State
3 of Oregon and Occupants of the Premises, all of them, it is hereby

4 ORDERED AND ADJUDGED:

5 4.

6
7 That the Deed of Trust dated June 6, 2011, executed by Richard L. Valenzuela, A Single Person
8 for the benefit of Wells Fargo Bank, N.A. ("Deed of Trust"), recorded on June 13, 2011 as Instrument
9 No. 2011-21303 in the official records of Deschutes County, Oregon, is a valid lien for the amount due
10 and owing as set forth in Paragraph 14 herein, against the Property situated in Deschutes County,
11 Oregon, and described as follows

12 LOT 5, BLOCK 23, ROMAINE VILLAGE UNIT 9, CITY OF BEND,
13 DESCHUTES COUNTY, OREGON.

14 **DECLARATION FOR RELIEF**

15 5.

16 REFORMATION OF THE DEED OF TRUST TO ADD CORRECT LEGAL DESCRIPTION:

17 Under the terms of the Loan, Richard L. Valenzuela agreed to irrevocably grant and convey the
18 Property to a Trustee with power of sale, as security for the Loan and for the benefit of Lender, its
19 successors in interest and assigns. However, contrary to the contemplation and intent of the parties,
20 the Deed of Trust was recorded with an incorrect legal description of the subject Property. The serial
21 numbers of the manufactured home listed on the Manufactured Home Rider to the Deed of Trust are
22 "A45SC351OR," "B45C351OR," and "C45SC351OR" were substituted for "A4SC351OR,"
23 "B4SC351OR," and "C4SC351OR." The legal description in the Deed of Trust is as follows:

24 //

1 LOT 5, BLOCK 23, ROMAINE VILLAGE UNIT 9, CITY OF
2 BEND, DESCHUTES COUNTY OREGON.

Used	1978	Silvercrest	
New/Used	Year	Manufacturer's Name	
			061 x 036
Model Name or Model No.			Length x Width
A45C351OR	B45C351OR	C45C351OR	
Serial No.	Serial No.	Serial No.	Serial No.

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8 THE HOME SHALL BE ANCHORED TO THE LAND BY
9 ATTACHMENT TO A PERMANENT FOUNDATION,
10 CONSTRUCTED IN ACCORDANCE WITH APPLICABLE STATE
11 AND LOCAL BUILDING COES AND MANUFACTOER'S
12 SPECIFICATIONS IN A MANNER SUFFICIENT TO VALIDATE
13 ANY APPLICABLE MANUFACTURER'S WARRANTY, AND
14 PERMANENTLY CONNECTED TO APPROPRIATE RESIDENTIAL
15 UTILITIES (E.G., WATER, GAS, ELECTRICITY, SEWER)
16 ("PERMANENTLY AFFIXED"). THE HOMEOWNER INTENDS
17 THAT THE HOME BE AN IMMOVEABLE FIXTURE AND
18 PERMANENT IMPROVEMENT TO THE LAND.

19 The legal description in the Deed of Trust does not match the legal description of the Property
20 maintained as maintained by the Institute for Building Technology and Safety (IBTS). The correct legal
21 description, and the description maintained by IBTS is as follows:

22 LOT 5, BLOCK 23, ROMAINE VILLAGE UNIT 9, CITY OF
23 BEND, DESCHUTES COUNTY OREGON.

Used	1978	Silvercrest	
New/Used	Year	Manufacturer's Name	
			061 x 036
Model Name or Model No.			Length x Width
A4SC351OR	B4SC351OR	C4SC351OR	
Serial No.	Serial No.	Serial No.	Serial No.

24
25 THE HOME SHALL BE ANCHORED TO THE LAND BY
26 ATTACHMENT TO A PERMANENT FOUNDATION,

1 CONSTRUCTED IN ACCORDANCE WITH APPLICABLE STATE
2 AND LOCAL BUILDING COES AND MANUFACTOER'S
3 SPECIFICATIONS IN A MANNER SUFFICIENT TO VALIDATE
4 ANY APPLICABLE MANUFACTURER'S WARRANTY, AND
5 PERMANENTLY CONNECTED TO APPROPRIATE RESIDENTIAL
6 UTILITIES (E.G., WATER, GAS, ELECTRICITY, SEWER)
7 ("PERMANENTLY AFFIXED"). THE HOMEOWNER INTENDS
8 THAT THE HOME BE AN IMMOVEABLE FIXTURE AND
9 PERMANENT IMPROVEMENT TO THE LAND.

10 Therefore, Plaintiff requests declaratory relief from the Court to reform the Deed of Trust by striking
11 the incorrect legal description contained in the Deed of Trust, and replacing it with the full and
12 correct legal description as maintained in the Deschutes County Real property records.

13 6.

14 That the lien of the Deed of Trust is superior to any interest, lien, or claim of defendants
15 Unknown Heirs of Richard L. Valenzuela; Nancy Green, as Affiant of the Estate of Richard L.
16 Valenzuela aka Nancy Green; Richard L. Valenzuela, Jr.; Andrew Shane Hollaway Valenzuela; Renee
17 Robinson; Brook Valenzuela; Sean A. Johnson; Theresa Evens; Romaine Village Home Homeowner's
18 Association; State of Oregon and Occupants of the Premises in the Property, and that said Deed of Trust
19 is hereby foreclosed by this Court on the Property.

20 7.

21 That on November 10, 2011, the grantors of the Note and Deed of Trust passed away. This suit
22 constitutes an attempt to execute upon the Property as security for the Amount Due to Plaintiff under
23 the terms of the Deed of Trust.

24 8.

25 That defendants Unknown Heirs of Richard L. Valenzuela; Nancy Green, as Affiant of the
26 Estate of Richard L. Valenzuela aka Nancy Green; Richard L. Valenzuela, Jr.; Andrew Shane Hollaway

1 Valenzuela; Renee Robinson; Brook Valenzuela; Sean A. Johnson; Theresa Evens; Romaine Village
2 Home Homeowner's Association; State of Oregon and Occupants of the Premises, each of them, and all
3 parties claiming by, through, or under them as purchasers, encumbrances, or otherwise, are forever
4 barred and foreclosed of all interests, liens, or claims in the Property, and every portion thereof,
5 excepting only the statutory right of redemption provided by the laws of the State of Oregon.
6

7 9.

8 That defendants Unknown Heirs of Richard L. Valenzuela; Nancy Green, as Affiant of the
9 Estate of Richard L. Valenzuela aka Nancy Green; Richard L. Valenzuela, Jr.; Andrew Shane Hollaway
10 Valenzuela; Renee Robinson; Brook Valenzuela; Sean A. Johnson; Theresa Evens; Romaine Village
11 Home Homeowner's Association; State of Oregon and Occupants of the Premises, all of them, are not
12 entitled to a homestead exemption as against Plaintiff's Deed of Trust.
13

14 10.

15 That all of the right, title and interest which Richard L. Valenzuela, A Single Person had on June
16 6, 2011, the date of the Deed of Trust, and all of the right, title and interest defendants Unknown Heirs
17 of Richard L. Valenzuela; Nancy Green, as Affiant of the Estate of Richard L. Valenzuela aka Nancy
18 Green; Richard L. Valenzuela, Jr.; Andrew Shane Hollaway Valenzuela; Renee Robinson; Brook
19 Valenzuela; Sean A. Johnson; Theresa Evens; Romaine Village Home Homeowner's Association; State
20 of Oregon and Occupants of the Premises and any successor thereafter had in and to the real Property is
21 hereby ordered to be sold by law, and the proceeds of sale shall be applied first toward the sheriff's fees
22 and costs of sale, then toward the satisfaction of the amount due and owing set forth in Paragraph 14
23 herein; and the surplus, if any, to the Clerk of the Court to be disbursed to such party or parties as may
24 establish their right thereto.
25
26

11.

That Plaintiff may become purchaser at the sheriff's sale of the Property and may bid up to the aggregate amount due and owing set forth in Paragraph 14 herein, plus interest from the date of this Judgment until sale without advancing any cash except money required for the sheriff's sale.

12.

That the Plaintiff, if the successful purchaser of the Property at the sheriff's sale, reserves the right to motion the court after sale for exclusive and immediate possession of the Property through the issuance and enforcement of a writ of assistance, should defendants Unknown Heirs of Richard L. Valenzuela; Nancy Green, as Affiant of the Estate of Richard L. Valenzuela aka Nancy Green; Richard L. Valenzuela, Jr.; Andrew Shane Hollaway Valenzuela; Renee Robinson; Brook Valenzuela; Sean A. Johnson; Theresa Evens; Romaine Village Home Homeowner's Association; State of Oregon and Occupants of the Premises refuse to surrender possession of the Property immediately upon the purchaser's demand for possession.

13.

That Plaintiff is entitled to, and is hereby awarded its attorney fees and costs incurred in this action, and that Plaintiff's attorney fees in the amount of \$3,085.00 and its litigation costs in the amount of \$12,396.25, shall be, and is hereby declared additional amounts secured by and hereinafter shall be made part of the amount of the debt secured by Plaintiff's Deed of Trust.

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1 **DECLARATION OF DEBT SECURED BY DEED OF TRUST**

2 **(Pursuant to Senate Bill 368)**

3 14.

4 Under the terms of the Deed of Trust and the promissory note dated June 6, 2011, in the
5 principal amount of \$133,023.14, there is now due and owing the following amounts, to be hereinafter
6 described as the Amount Due:
7

8 **Attorneys' Fees and Costs**

Attorneys' Fees		\$3,085.00
Title Report	\$535.00	
Filing Fee - Complaint	\$531.00	
Recording Fee - Lis Pendens	\$67.00	
Process Service Fees	\$3,035.00	
Publication Costs	\$6,913.08	
Sheriff and Writ Fees	\$1,315.17	
	Total Costs	\$12,396.25
	Total Attorneys' Fees and Costs	\$15,481.25

15 **Lenders' Principal and Interest**

Principal Balance	\$133,023.14	
Accrued Interest from November 1, 2011, to April 18, 2017, the date calculated by the declarant in the declaration of indebtedness @ 4.75000 per annum	\$34,520.04	
	Total Principal & Interest	\$167,543.18

19 **Lenders' Fees and Costs**

Accumulated Late Charges	\$34.97	
Hazard Insurance Disbursements	\$5,645.16	
Tax Disbursements	\$6,294.86	
Property Inspections / Preservation	\$999.00	
	Total Lenders' Fees and Costs:	\$12,973.99
	Total Lenders' Principal, Interest, Fees, and Costs:	\$180,517.17

25 //

26 //

1 Additional pre-judgment interest pursuant to ORS
2 18.042 from April 18, 2017 to the date entry of
3 judgment at the contract rate of interest as defined by
4 Section 2 of the Note

5 Post-Judgment interest thereafter on the Total
6 Amount Due at the contract rate of interest as defined
7 by Section 2 of the note, or 9.000% per annum,
8 whichever is greater.

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Total Amount Due **\$195,998.42**

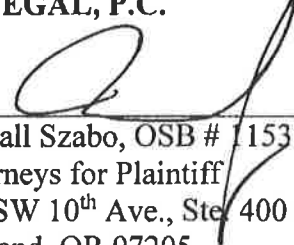
Signed: 7/20/2017 11:30 AM



Circuit Court Judge Walter R. Miller

Presented by:

RCO LEGAL, P.C.

By  DATED 7/18/17
Randall Szabo, OSB # 115304
Attorneys for Plaintiff
511 SW 10th Ave., Ste. 400
Portland, OR 97205
Telephone (503) 977-7840; Facsimile (503) 977-7963
rszabo@rcolegal.com

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IN THE CIRCUIT COURT FOR THE STATE OF OREGON
IN AND FOR THE COUNTY OF DESCHUTES

WELLS FARGO BANK, N.A., its successors in
interest and/or assigns,

Plaintiff,

v.

UNKNOWN HEIRS OF RICHARD L.
VALENZUELA; NANCY GREEN, AS
AFFIANT OF THE ESTATE OF RICHARD L.
VALENZUELA AKA NANCY GREEN;
RICHARD L. VALENZUELA, JR.; ANDREW
SHANE HOLLOWAY VALENZUELA;
RENEE ROBINSON; BROOK VALENZUELA;
SEAN A. JOHNSON; THERESA EVENS;
ROMAINE VILLAGE HOME
HOMEOWNER'S ASSOCIATION; STATE OF
OREGON; AND OCCUPANTS OF THE
PREMISES;

Defendants.

Case No. 14CV0860FC

**CERTIFICATE OF UTCR 5.100
COMPLIANCE**

[EX PARTE]

This Proposed order or judgment is ready for judicial signature because:

- A. The order or judgment was served on the opposing counsel not less than 3 days prior to submission to the court, or mailed to a self-represented party at the party's last known address not less than 7 days prior to submission to the court with a notice of the time period to object.
- B. The order or judgment is accompanied by a stipulation by opposing counsel that no objection exists as to the judgment or order.
- C. The judgment or order is exempt from UTCR 5.100(1) because:

CERTIFICATE OF UTCR 5.100 COMPLIANCE - 1

60083

**RCO
LEGAL, P.C.**

511 SW 10th Ave., Ste. 400
Portland, OR 97205
Phone: 503.977.7840
Fax: 503.977.7963

- 1 a. The judgment or order is a proposed order or judgment presented in open court
with the parties present.
- 2 b. The judgment or order is of a kind that may be presented *ex parte* and has been
submitted either in person or by mail *ex parte*.
- 3 c. The judgment is a proposed judgment after an order for default has already been
4 entered or is being simultaneously requested against the opposing party.
- 5 d. The proposed judgment is subject to UTCR 10.0099
- 6 e. The proposed judgment or order is an uncontested probate and protective
7 proceeding.
- 8 f. This matter is certified to the court under ORS 416.422, 416.430, 416.435, or
9 416.448.

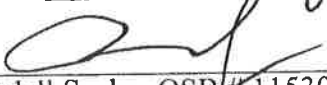
10 D. In compliance with UTCR 5.100(2)(b), the drafting party certifies the following as to
11 why the proposed judgment or order is ready for a judicial signature:

- 12 1. Each opposing party affected by this order or judgment has stipulated to the order or
13 judgment, as shown by each opposing party's signature on the document being submitted.
- 14 2. Each opposing party affected by this order or judgment has approved the order or
15 judgment, as shown by signature on the document being submitted or by written
16 confirmation of approval sent to me.
- 17 3. I have served a copy of this order or judgment on all parties entitled to service and:
 - 18 a. No objection has been served on me.
 - 19 b. I received objections that I could not resolve with the opposing party despite
20 reasonable efforts to do so. I have filed a copy of the objections I received and
21 indicated which objections remain unresolved.
 - 22 c. After conferring about objections, [role and name of opposing party] agreed to
23 independently file any remaining objection.
- 24 4. The relief sought is against an opposing party who has been found to be in default.
- 25 5. An order of default is being requested with this proposed judgment.
- 26 6. Service is not required pursuant to subsection (3) of this rule, or by statute, rule, or
otherwise noted.

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7. [] This is a proposed judgment that includes an award of punitive damages and notice has been served on the Director of the Crime Victims' Assistance Section as required by subsection (4) of this rule.

Dated this 18 day of July, 2017

By, 
Randall Szabo, OSB# 115304
rszabo@rcolegal.com
Attorney for Plaintiff