

I CERTIFY THAT THE FOREGOING IS A TRUE,  
EXACT AND FULL COPY OF THE ORIGINAL.

RCVD DCS00VL 22OCT' 21 08:10

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

TOMICA WITHERS,

Plaintiff,

v.

RAYMOND PHILLIP WILLIAMS,

Defendant.

Case No.: 14CV0538

WRIT OF EXECUTION ON REAL  
PROPERTY

TO: THE SHERIFF OF DESCHUTES COUNTY:

GREETINGS:

On October 12, 2021 in the Circuit Court of the State of Oregon for the County of Deschutes, an Order was entered authorizing the sale of real property located at 2109 SW Pumice Ave, Redmond, Oregon 97756 (the "Property") to satisfy a General Judgment and Money Award Plaintiff obtained in this action. A true and correct copy of that Order ("Order") is attached hereto as Exhibit A. A true and correct copy of that General Judgment and Money Award ("General Judgment") is attached hereto as Exhibit B.

The total amount due on the General Judgment is \$197,787.01 with interest accruing at the rate of 9 percent per annum from September 23, 2014 until paid at a per diem rate of \$31.32.

NOW THEREFORE, in the name of the State of Oregon you are commanded to sell that specific real property and to apply the proceeds of such sale as directed by the Order to the unpaid balance of the General Judgment and post-judgment interest until paid and make due

1 return hereon within 60 days after you receive this Writ, unless an extension of the return date is  
2 requested by Plaintiff.

3 The mailing address of the judgment creditor is:

4 Tomica Withers  
5 c/o Bryant Emerson LLP  
6 888 SW Evergreen Ave  
7 PO Box 457  
8 Redmond, OR 97756

9 The mailing address of the judgment debtor is:

10 Raymond Phillip Williams  
11 2109 SW Pumice Ave  
12 Redmond, OR 97756

13 The physical address of the real property is:

14 2109 SW Pumice Ave  
15 Redmond, OR 97756

16 The legal description of the real property is:  
17  
18  
19  
20  
21  
22  
23  
24

1 Lot One, Block One of Partition Plat No. 1990-28, being a portion of  
2 the Northwest Quarter of the Northeast Quarter of the Northeast  
3 Quarter of Section 20, Township 15 South, Range 13 East of the  
4 Willamette Meridian, Deschutes County, Oregon.

5 EXCEPTING THEREFROM a parcel of land being part of Lot 1 in Block 1  
6 of said Partition Plat described as follows: Commencing at a 1" pipe  
7 monumenting the Northeast corner of Section 20, Township 15 South,  
8 Range 13 EWM, the initial point; thence south 88°52'50" West along  
9 the North line of the NE1/4 NE1/4 of said Section 20, 677.31 feet to  
10 the East line of the Northwest quarter of NE1/4 NE1/4; thence South  
11 00°15'22" East along East line, 537.76 feet to a 3/4" pipe  
12 monumenting the Southeast corner of Lot 2, Block 1 of Partition Plat  
13 No 1990-28; thence South 89°02'37" West along the South line of said  
14 Lot, 15.00 feet to a 3/4" pipe monumenting the Northeast corner of  
15 Lot 1, Block 1 of said Partition Plat and the true point of  
16 beginning; thence South 89°02'37" West, 85.95 feet to the West line  
17 of said Lot 1 and to the right of way of S.W. 21st Place; thence  
18 North 00°23'51" West along said right of way and West line, 8.59 feet  
19 to a 1/2" pipe on the line common to said Lots 1 and 2; thence South  
20 85°14'42" East along said common line, 86.30 feet to the point of  
21 beginning.  
22  
23  
24

Signed: 10/14/2021 03:11 PM

*Angela R. Curtis*

Trial Court Administrator  
Angela Curtis



Submitted by:

James L. Keathley, OSB 203032  
Of Attorneys for Plaintiff

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

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

TOMICA WITHERS,

Plaintiff,

v.

RAYMOND PHILLIP WILLIAMS,

Defendant.

Case No.: 14CV0538

ORDER ON PLAINTIFF’S MOTION  
TO HAVE RESIDENTIAL  
PROPERTY SOLD ON EXECUTION

THIS MATTER having come before the Court on Plaintiff’s Motion to Have Residential Property Sold on Execution filed on July 28, 2021. Plaintiff appeared through counsel, James L. Keathley, and Defendant appeared personally without counsel. The Court, having heard oral argument on September 30, 2021, and being fully advised in the premises, GRANTS Plaintiff’s Motion as follows:

ORDERED authorizing the sale of Defendant’s interest in the real property located at 2109 SW Pumice Avenue, Redmond, Oregon 97756 and legally described as:

///

///

///

1 Lot One, Block One of Partition Plat No. 1990-28, being a portion of  
2 the Northwest Quarter of the Northeast Quarter of the Northeast  
3 Quarter of Section 20, Township 15 South, Range 13 East of the  
4 Willamette Meridian, Deschutes County, Oregon.

5 EXCEPTING THEREFROM a parcel of land being part of Lot 1 in Block 1  
6 of said Partition Plat described as follows: Commencing at a 1" pipe  
7 monumenting the Northeast corner of Section 20, Township 15 South,  
8 Range 13 EWM, the initial point; thence south 88°52'50 West along  
9 the North line of the NE1/4 NE1/4 of said Section 20, 677.31 feet to  
10 the East line of the Northwest quarter of NE1/4 NE1/4; thence South  
11 00°15'22" East along East line, 537.76 feet to a 3/4" pipe  
12 monumenting the Southeast corner of Lot 2, Block 1 of Partition Plat  
13 No 1990-28; thence South 89°02'37" West along the South line of said  
14 Lot, 15.00 feet to a 3/4" pipe monumenting the Northeast corner of  
15 Lot 1, Block 1 of said Partition Plat and the true point of  
16 beginning; thence South 89°02'37" West, 85.95 feet to the West line  
17 of said Lot 1 and to the right of way of S.W. 21st Place; thence  
18 North 00°23'51" West along said right of way and West line, 8.59 feet  
19 to a 1/2" pipe on the line common to said Lots 1 and 2; thence South  
20 85°14'42" East along said common line, 86.30 feet to the point of  
21 beginning.

22 The property is subject to the homestead exemption in the amount of \$40,000.

23 Proceeds from the sale shall be applied first towards the cost of the sale, second toward the  
24 homestead exemption, third towards the satisfaction of the judgment, and finally any remaining  
proceeds shall be returned to the defendant.

Signed: 10/12/2021 03:15 PM

  
Circuit Court Judge Walter R. Miller

1 UTCR 5.100 COMPLIANCE:

2 I certify this order is ready for judicial signature because I have served a copy of this order on each  
3 party entitled to service and each party has confirmed to me they have no objections.

4 Submitted by:

5 /s/ James L. Keathley

6 LONN T. W. JOHNSTON, OSB 083734

7 Lonon@redmond-lawyers.com

8 JAMES L. KEATHLEY, OSB 203032

9 James@redmond-lawyers.com

10 Of Attorneys for Plaintiff

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

**CERTIFICATE OF SERVICE**

I hereby certify that I served the foregoing [proposed] Order on Plaintiff's Motion to Have Residential Property Sold on Execution on:

Raymond Phillip Williams  
2109 SW Pumice Ave  
Redmond, OR 97756

by the following indicated methods:

**Regular or Priority Mail:** by mailing a true and correct copy thereof in a sealed envelope with postage paid thereon, addressed as above stated, which is the last-known office address of the attorney, and by depositing it with the United States Postal Service at Redmond, Oregon, on the date set forth below.

**Plus E-mail:**

SIGNED this 1<sup>st</sup> day of October, 2021.

/s/ James L. Keathley

LONN T. W. JOHNSTON, OSB 083734  
JAMES L. KEATHLEY, OSB 203032  
Of Attorneys for Plaintiff

Verified Correct Copy of Original 10/17/2019

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

SEP 19 2014

FILED  
CIRCUIT COURT  
2014 SEP 23 PM 3:21  
DESCHUTES COUNTY  
OREGON

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

TOMICA WITHERS,	)	Case No. 14CV0538
	)	
Plaintiff,	)	General Judgment &
	)	money Award
v.	)	
	)	
RAYMOND PHILLIP WILLIAMS,	)	
	)	
Defendant.	)	


The court having signed a Default Order on September 17, 2014 in favor of the Plaintiff Tomica Withers and against the Defendant Raymond Phillip Williams for failing to appear or otherwise defend, and having reviewed the Declaration of the Plaintiff Tomica Withers in Support of a Default Judgment, the Plaintiff's Cost Bill and the court file, and the court being fully advised in the premises; now, therefore, it is hereby

ORDERED and ADJUDGED that Plaintiff Tomica Withers have judgment against Defendant Raymond Phillip Williams in the principal amount of \$125,640.93, plus a prevailing party fee of \$300 pursuant to ORS 20.190(2)(a)(A), plus \$571.00 for Plaintiff's costs and disbursements incurred herein, plus post-judgment interest at the rate of 9% per annum commencing on the date this judgment is entered until paid pursuant to ORS 82.010(2), and that execution issue for these amounts.

MONEY JUDGMENT

Judgment Creditor:	Tomica Withers
	61330 Obernolte
	Bend, OR 97701

14CV0538  
JGGM  
Judgment - General Creates Lien  
11823888



13.14



Verified Correct Copy of Original 10/17/2019

Judgment Creditor's Lawyer: Hurley Re, P.C.  
747 SW Mill View Way  
Bend, OR 97702  
(541)317-5505

Judgment Debtor: Raymond Phillip Williams  
2109 SW Pumice Avenue  
Redmond, OR 97756

Year of Birth: Not applicable.  
Tax ID#: unknown  
ODL#: Not Applicable.

Judgment Debtor's Lawyer: None.

Person/Public Body Other than Judgment Creditor Entitled to Portion of Judgment: None.

Judgment Amount: \$125,640.93

Prejudgment Interest: None.

Postjudgment Interest: Simple interest at the rate of 9% per annum, to be compounded annually from the date of this money judgment until paid.


Prevailing Party Fee: \$300.00

Other Costs: \$571.00

Attorney Fees: None

Total Money Judgment: \$126,511.93.

Signed this 23 day of September, 2014.

  
\_\_\_\_\_  
Circuit Court Judge  
**BETH M. BAGLEY**

Submitted by:  
Gary R. Johnson, OSB # 933222  
Attorney for Plaintiff

Page 2 -General Judgment

HURLEY RE PC  
Attorneys at Law  
747 S W Mill View Way, Bend, OR 97702  
(541) 317-5505 (Phone); (541) 317-5507 (Facsimile), grjohnson@hurley-re.com (Email)