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IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON
OKANOGAN COUNTY

GAMBLE LAND & TIMBER LTD.,
Washington limited partnership; and
CASCADE HOLDINGS GROUP, LP, a
Nevada limited partnership,

Plaintiffs

vs.

OKANOGAN COUNTY, WASHINGTON
a Washington Municipal Corporation; and
all other persons or parties unknown claiming
any right, title, estate, lien or interest in the real
estate described in the Complaint herein

Defendants,

and

OKANOGAN OPEN ROADS COALITION,
and individual taxpayer members thereof
LORAH SUPER, CRAIG OLSON, and
KEVIN CREAGER,

Defendants and Cross-Plaintiffs.

Case No. 17-2-00086-0

**MOTION FOR SUMMARY
JUDGMENT**

COMES NOW Defendants and Cross-Plaintiffs OKANOGAN OPEN ROADS

COALITION and individual taxpayer members thereof LORAH SUPER, CRAIG OLSON,

and KEVIN CREAGER(together, "OORC"), by and through their attorney of record Natalie



Natalie N. Kuehler

Principal

RYAN & KUEHLER PLLC

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(509) 557-5769 www.ryankuehler.com

1 N. Kuehler, of Ryan & Kuehler PLLC, and moves this court for an order for summary
2 judgment.

3 This motion is based upon the pleadings and files herein, as well as the following
4 documents:

- 5 1. Memorandum of Law in Support of Motion for Summary Judgment;
- 6 2. Expert Report of E. Richard Hart;
- 7 3. Declaration of Natalie N. Kuehler, Esq.;
- 8 4. Declaration of William Tackman, P.L.S.;
- 9 5. Declaration of Joshua Thomson, P.E.

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12 Dated: July 1, 2019
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17 /s/ Natalie N. Kuehler
18 NATALIE N. KUEHLER, WSBA No. 50322
19 Principal
20 RYAN & KUEHLER PLLC
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22 Winthrop, WA 98862
23 Email: nk@ryankuehler.com
24 *Attorney for Okanogan Open Roads Coalition*
25 *and individual defendants/cross-plaintiffs*
26

