

SEP 06 2013

FILED

SUPERIOR COURT OF THE STATE OF WASHINGTON
COUNTY OF BENTON

STATE OF WASHINGTON,)

Plaintiffs,)

v.)

ARLENE'S FLOWERS, INC., d/b/a)

ARLENE'S FLOWERS AND GIFTS, and)

BARRONELLE STUTZMAN,)

Defendants.)

ROBERT INGERSOLL and CURT FREED,)

Plaintiffs,)

v.)

ARLENE'S FLOWERS, INC., d/b/a)

ARLENE'S FLOWERS AND GIFTS; and)

BARRONELLE STUTZMAN,)

Defendants.)

No. 13-2-00871-5
(Consolidated with 13-2-00953-3)

**MOTION FOR PARTIAL SUMMARY
JUDGMENT ON CPA CLAIM BY
INGERSOLL AND FREED**

COMES now the Defendants, Barronelle Stutzman and Arlene's Flowers, Inc., and moves this Court for partial summary judgment on Plaintiffs' Ingersoll and Freed's Consumer Protection Act ("CPA") claim on the basis that Ingersoll and Freed have failed to establish the

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1 necessary elements to prove a CPA claim and therefore Defendants are entitled to judgment as a
2 matter of law on that claim.

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4 This motion is supported by the Memorandum of Authorities, the Declaration of Alicia
5 Berry, and the Declaration of Barronelle Stutzman filed herewith.

6 RESPECTFULLY submitted this 6th day of September, 2013.

7 LIEBLER, CONNOR, BERRY & ST. HILAIRE

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