

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  
26

IN THE SUPERIOR COURT FOR THE STATE OF WASHINGTON  
FOR PACIFIC COUNTY

BEACON CHARTERS AND RV )  
PARK, LLC, FKA BEACON RV PARK )  
Plaintiff, )  
v. )  
JOY HARLESS, )  
and all other occupants, 332 Elizabeth Av SE )  
space 46, Ilwaco, WA 98624; )  
Defendants. )

Case No. 22-2-00138-25  
RESPONSE IN OPPOSITION TO  
DEFENDANT’S MOTION  
FOR PRELIMINARY INJUNCTION

COMES NOW Plaintiff, Beacon Charters and RV Park, LLC, fka Beacon RV Park (“Beacon”) by and through their counsel Mark G. Passannante, of Broer & Passannante, P.S. and Robert S. Phed, Of Counsel, and respond in opposition to Plaintiff’s Motion for Preliminary Injunction filed on September 30, 2022 and cited in for a hearing on October 31, 2022 and requests this Court deny Defendant’s request for an injunction.

Because there is not a motion to consolidate, but a motion for a joint hearing with cases Nos. 22-2-00126-25; 22-2-00128-25; 22-2-00133-25; 22-2-00135-25; 22-2-00136-25; 22-2-00138-25, Plaintiff does not object to this Court joint hearing on the motions that were filed in each of these individual cases but which are identical for all effects and purposes. Plaintiff further requests this

1 Court to treat this Response as a Response for each of the above listed cases for the purposes of  
2 judicial economy and to take judicial notice of the filings in case 22-2-00135-25 which are fully  
3 incorporated herein and made a part thereof. ER 201. Should the Court require Plaintiff to file exact  
4 duplicates of the Response for each of the affected cases with a different caption for each, Plaintiff  
5 will do so.

6 Dated: October 28, 2022.

7 */s/ Robert S. Phed*

8 Mark G. Passannante, WSBA#25680  
9 Robert S. Phed, WSBA#42399  
Attorneys for Plaintiff

10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26

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  
26

**CERTIFICATE OF SERVICE**

I hereby certify that on October 28, 2022, I served the foregoing Response to Motion on the party(s) listed below by the method described below:

**Facsimile**

**U.S. Mail, postage prepaid**

Last known address:  
Sebastian Miller, WA AAG  
Washington State Attorney General  
800 Fifth Avenue, Suite 2000  
Seattle WA 98104

Robina Rayamajhi  
Thurston County Volunteer Legal Services  
P.O. Box 405  
Olympia, WA 98507

**Hand delivered in Court:**

DATED: October 28, 2022

/s/ Robert S Phed

---

Mark G. Passannante, WSBA#25680  
Robert S. Phed, WSBA# 42399  
Of Attorneys for Plaintiff