

Name and Return Address:

Law Office of Glyn E. Lewis PLLC
6100 219th St. S.W., Suite 480
Mountlake Terrace, WA 98043

Document Title(s)

1. DEFAULT JUDGMENT

2. _____

Reference Numbers(s) of Documents Assigned or Released

_____ ADDITIONAL REFERENCE #'S ON PAGE _____

Grantor(s)

1. XIAODONG CUI

2. _____ ADDITIONAL GRANTORS ON PAGE _____

Grantee(s)

1. BIN CHEN

2. _____ ADDITIONAL GRANTEE(S) ON PAGE _____

Legal Description (abbreviated form: i.e. lot, block, plat or section, township, range, quarter/quarter)

Ptn Lot 4, SP PI00-0408 AF #200208010118

_____ ADDITIONAL LEGAL IS ON PAGE 2

Assessor's Property Tax Parcel/Account Number(s)

P20684, P1221145 ADDITIONAL PARCEL #'S ON PAGE _____

THE AUDITOR/RECORDER WILL RELY ON THE INFORMATION PROVIDED ON THIS FORM. THE STAFF WILL NOT READ THE DOCUMENT TO VERIFY THE ACCURACY OR COMPLETENESS OF THE INDEXING INFORMATION PROVIDED HEREIN.

Legal Description

That portion of Lot 4 of Short Plat Number PL00-0408 as approved on July 31, 2002 and recorded August 1, 2002 under Auditor's File Number 200208010118, records of Skagit County, Washington, being in Sections 13 and 24, Township 34 North, Range 2 East, W.M. and also in Section 19, Township 34 North, Range 3 East, W.M., lying Southerly and Westerly of the following described line:

Commencing at the Southeast corner of Lot 4 of Short Plat Number PL02-0485 as approved on September 13, 2002 and recorded September 16, 2002 under Auditor's File Number 200209160059, records of Skagit County, Washington, being in Sections 13, Township 34 North, Range 2

East, W.M. and also in Section 18, Township 34 North, Range 3 East, W.M.;

Thence Westerly along the South line of said Lot 4 of said Short Plat Number PL02-0485 to the Southeast corner of Section 13, as shown on the "Plat of Skagit Beach No. 1 as per plat recorded in Volume 8 of Plats, page 71, records of Skagit County, Washington;

Thence S 88°45'40" W, 2199.86 feet along the South line of said Section 13, as shown of the "Plat of Skagit Beach No. 1" to a point on the East line of Tract "E" of said "Plat of Skagit Beach No. 1", which bears N 45°28'30" E, 100.95 feet from the Southeast corner of said Tract "E", and which point is the TRUE POINT OF BEGINNING;

Thence N 88°45'40" E, 58.34 feet along the South line of said Section 13 to a point on a line that is 40 feet East of and parallel with the East line of Tract "E" of said "Plat of Skagit Beach No. 1"

Thence S 45°28'30" W, 130.52 feet along said parallel line;

Thence S 9°44'00" W, 53.06 feet along a line parallel with the East line of said "Plat of Skagit Beach No. 1" to an existing ditch;

Thence S 66°31'59" E, 18.50 feet along said ditch;

Thence S 32°54'23" E, 22.50 feet along said ditch;

Thence S 10°11'32" E, 38.03 feet along said ditch;

Thence S 19°18'54" W, 161.19 feet along said ditch;

Thence S 2°55'57" E, 65.76 feet along said ditch;

Thence S 17°42'52" E, 84.23 feet along said ditch;

Thence S 31°14'08" E, 81.72 feet along said ditch;

Thence S 39°47'07" E, 108.82 feet along said ditch;

Thence S 48°43'40" E, 131.89 feet along said ditch;

Thence S 29°41'21" E, 110.25 feet along said ditch;

Thence S 12°50'42" E, 174.01 feet along said ditch;

Thence S 16°17'21" E, 137.92 feet along said ditch;

Thence S 21°45'4]" E, 105.65 feet along said ditch;
Thence S 42°03'59" E, 161.32 feet along said ditch;
Thence S 53°43'28"E, 133.16 feet along said ditch;
Thence S 49°24'40"E, 115.89 feet along said ditch;
Thence S 68°41'03" E, 162.43 feet along said ditch;
Thence S 1021'14" E, 61.40 feet along said ditch;
Thence S 19°06'04" W, 93.09 feet along said ditch;
Thence S 14°08'21" W, 69.28 feet along said ditch;
Thence S 29951'07" E, 100.06 feet along said ditch;
Thence S 58°48'26" E, 98.92 feet along said ditch;
Thence S 70°48'24" E, 102.92 feet along said ditch;
Thence S 58°20' 31" E, 90.89 feet along said ditch;
Thence S 31°17'46" E, 194.07 feet along said ditch;
Thence S 40°36'49" E, 57.94 feet along said ditch;
Thence S 44°44'37" E, 72.81 feet along said ditch;
Thence S 22° 10'31" E, 126.83 feet along said ditch;
Thence S 5°21'14" E, 121.88 feet along said ditch;

Thence S 0°34'30" W, 57.89 feet to the South line of the Southeast ¼ of the Northeast ¼ of said Section 24 and the terminus of said line at a point that is N 89°25'30" W, 836.36 feet from the Southeast corner of the Northeast ¼ of said Section 24 (East ¼ corner of said Section 24).

EXCEPT that portion thereof lying Northerly of the following described line:

Commencing at the Southeast corner of Lot 4 of Short Plat Number PL02-0485 as approved on September 13, 2002 and recorded September 16, 2002 under Auditor's File Number

200209160059, records of Skagit County, Washington, being in Sections 13, Township 34 North, Range 2 East, W.M. and also in Section 18, Township 34 North, Range 3 East, W.M.;

Thence Westerly along the South line of said Lot 4 of said Short Plat Number PL02-0485 to the corner common to Sections 18 and 19, Township 34 North, Range 3 East, W.M., and Sections 13 and 24, Township 34 North, Range 2 East, W.M., as shown on the "Plat of Skagit Beach No. 1 as per plat recorded in Volume 8 of Plats, page 71, records of Skagit County, Washington;

Thence S 0°04° E along the East line of said Section 24, 1248.2 feet to the true point of beginning;

Thence S 88°45'40" W along a line parallel to the North line of said Section 24 as shown on the "Plat of Skagit Beach No. 1", 2805.33 feet, more or less, to a point on the West line of said Lot 4 of Short

Plat Number PL00-0408, being also a point On the East line of Tract "A" of the "Plat of Skagit Beach Div. NO. 4", as per plat recorded in Volume 11 of Plats, page 45, under Auditor's File Number 843908, records of Skagit County, Washington, and the terminus of this line description, from which point the Easterly corner common to Lot 7 and Lot 8 of said "Plat of Skagit Beach Div. No. 4" bears S 88°45'40* W, 50.05 feet, more or less.

Situate in the County of Skagit, State of Washington.

**CERTIFIED
COPY**

FILED
23 APR 20 AM 11:11
HEIDI PERCY
COUNTY CLERK
SNOHOMISH CO. WASH

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SUPERIOR COURT OF WASHINGTON FOR SNOHOMISH COUNTY

BIN CHEN, an individual,
Plaintiff,
vs.
XIAODONG CUI, an individual;
Defendant.

CASE NO.: 23-2-02301-31
~~PROPOSED~~ DEFAULT JUDGMENT

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I. JUDGMENT SUMMARY

Judgment Creditor: Bin Chen

Judgment Creditor's Attorney: Glyn E. Lewis

Judgment Debtor: Xiaodong Cui

- a. Damages for fraud - \$1,000,000.00
- b. Damages for breach of contract - \$60,000.00
- c. Prejudgment interest for damages for fraud since April 2020 - \$360,000.00--
(\$1,000,000.00 X 12% X 3 years) - *Reserved*

PROPOSED JUDGMENT

ORIGINAL

LAW OFFICE OF GLYN E. LEWIS
6100 219th Street S.W., Suite 480
Mountlake Terrace, WA 98043
Telephone (206) 661-5773

1 **TOTAL JUDGMENT: \$1,420,000.00**

2 This judgment shall bear interest at the rate of 12% per annum on the judgment amount
3 of \$1,060,000.00.
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6 **II. JUDGMENT**

7 This matter has come before the Court upon Plaintiff Bin Chen ("Plaintiff")'s motion for
8 entry of default judgment against Defendant Xiaodong Cui ("Defendant"). The court has
9 reviewed the Plaintiff's motion, the declarations of Glyn E. Lewis and Bin Chen and:
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11 The Court finds:

- 12 1. On February 12, 2023 the above captioned complaint for fraud was personally
13 served on Defendant.
- 14 2. To date Defendant has failed to respond to the above captioned complaint or enter
15 a notice of appearance.
- 16 3. As a proximate result of Defendant's breach of contract Plaintiff suffered
17 damages in the amount of \$60,000.00.
- 18 4. As a proximate result of Defendants' fraud and breach of fiduciary duty described
19 in Plaintiff's motion and supporting declarations Plaintiff suffered damages in the
20 amount of \$1,000,000.00.
- 21 5. Plaintiff shall be entitled to ~~prejudgment interest on~~ damages for breach of
22 fiduciary duty and fraud since April 2020 at the rate of 12% per annum in the
23 amount of \$360,000. *Reserved*

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26 NOW THEREFORE:

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PROPOSED JUDGMENT

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LAW OFFICE OF GLYN E. LEWIS
6100 219th Street S.W., Suite 480
Mountlake Terrace, WA 98043
Telephone (206) 661-5773

1 IT IS ORDERED AND DECREED that default judgment is hereby entered in favor of
2 Plaintiff and against Defendant in the sum of \$1,420,000.00 in damages for fraud.

3 Dated: April _____, 2023

4
5 **APR 20 2023**

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7 JUDGE/COURT COMMISSIONER

8 Presented by:
9 LAW OFFICE OF GLYN E. LEWIS

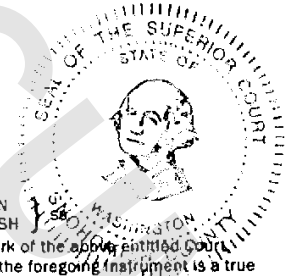
10 By /s/ Glyn Lewis
11 Glyn E. Lewis, WSBA#45744
12 Attorney for Plaintiff

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PROPOSED JUDGMENT

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UNOFFICIAL DOCUMENT



STATE OF WASHINGTON
COUNTY OF SNOHOMISH

I, HEIDI PERCY, Clerk of the above entitled Court do hereby certify that the foregoing instrument is a true and correct copy of the original now on file in my office.

In witness whereof, I hereunto set my hand and the Seal of the said

Court this APR 20 2023 day of

HEIDI PERCY, County Clerk

[Signature] Deputy