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UNITED STATES BANKRUPTCY COURT  
IN AND FOR THE EASTERN DISTRICT OF WASHINGTON

In re:

No.: **18-01857-FPC11**

**EDWARD A. DAWSON & MARCIA A.  
MEADE, d/b/a DAWSON & MEADE, P.S.,**

Chapter 11

Debtors.

**MOTION TO SELL REAL ESTATE FREE  
AND CLEAR OF LIENS AND INTERESTS,  
DISBURSE CERTAIN PROCEEDS OF  
SALE, AND SHORTEN TIME PERIOD TO  
OBJECT**

Debtors, by their undersigned attorney, move this Court for an Order authorizing Debtors to sell that property and home commonly known as 2722 E. Everett Avenue, Spokane, Washington and legally described as:

LOTS 15 AND 16, EXCEPT THE SOUTH 6 FEET THEREOF  
CONDEMNED FOR AN ALLEY, BLOCK 25, HUGHSON AND  
CHAMBERLIN'S ARLINGTON HEIGHTS SECOND ADDITION, AS  
PER PLAT RECORDED IN VOLUME "C" OF PLATS, PAGE 68;

SITUATE IN THE CITY OF SPOKANE, COUNTY OF SPOKANE,  
STATE OF WASHINGTON (hereinafter "Everett Home")

for the sum of Forty Thousand One Hundred Seventeen and 59/100 Dollars  
(\$40,117.59) cash at closing ("Price") to Dan Grishko and/or Inland Northwest Home  
Buyers (the "Purchaser").

Motion-1

**SOUTHWELL & O'ROURKE, P.S.**  
A PROFESSIONAL SERVICE CORPORATION  
ATTORNEYS AT LAW  
SUITE 960, PAULSEN CENTER  
WEST 421 RIVERSIDE AVENUE  
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1 Debtors further move the Court for an Order approving the sale free and clear of  
2 liens and interests, including, but not limited to, the following:

3 Liens, Judgments and Warrants identified as numbers 4 through 16 on  
4 Exhibit "1" attached (hereinafter jointly "Liens").

5 Debtors further move the Court for an Order that Liens shall attach to the  
6 proceeds of sale, except those numbered 7 (Minch-Schroeder), and 14 (State of  
7 Washington – a duplicate of #13), in the same manner and with the same priority as  
8 they attach to Everett Avenue, subject to the reasonable costs of administration of this  
9 Chapter 11 estate and subject to the disbursement provisions following.

10 Debtors further move the Court for an Order that at closing, the following  
11 disbursements shall be made:

12 1. General and delinquent real estate taxes shown as numbers 1, 2,  
13 and 3 on Exhibit "1".

14 2. City of Spokane liens, to the extent valid and unavoidable, shown  
15 as numbers 4 and 5 on Exhibit "1";

16 3. To the extent valid, unavoidable, and non-duplicative, warrants  
17 listed as numbers 8, 9, 10, 11, 12, 13, and 15 and lien listed as number 16 on  
18 Exhibit "1"; and  
19

20 4. To Debtors' estate account the sum of Fifteen Thousand Three  
21 Hundred Eight and 08/100 Dollars (\$15,308.08), the amount of the avoidable lien  
22 of number 7 on Exhibit "1".  
23

24 Debtors further move the Court for an Order approving the Ten Thousand Dollars  
25 (\$10,000.00) disbursement to Debtors for payment of ordinary business expenses.

Motion-2

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1 Debtors further move the Court for an Order shortening the time period to object  
2 to Debtors' proposal to a period equal to twelve (12) days from mailing the Notice to  
3 Creditors Re: Motion to Sell Real Estate Free and Clear of Liens and Interests, Disburse  
4 Certain Proceeds of Sale, and Shorten Time Period to Object (the "Notice").

5 This Motion is based upon the records and files herein, upon the Declaration of  
6 Debtor, and upon 11 U.S.C. § 363.

7 DATED this 28<sup>th</sup> day of January, 2019.

8 SOUTHWELL & O'ROURKE, P.S.  
9

10 BY: /s/ Dan O'Rourke  
11 DAN O'ROURKE, WSBA #4911  
12 Attorney for Debtors  
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Motion-3

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*First American*

## Schedule B

### Subdivision Guarantee

ISSUED BY

**First American Title Insurance Company**

GUARANTEE NUMBER

**3181712**

### RECORD MATTERS

1. General taxes and assessments, if any, for the year 2019, in an amount not yet available, which cannot be paid until the **15th day of February** of said year.

Tax Account No.: 36334.0910

Assessed Land Value: \$ 20,000.00

Assessed Improvement Value: \$ 31,900.00

2. Delinquent General Taxes for the year 2018 .

Tax Account No.: 36334.0910

#### **1st Half**

Amount Billed: \$ 554.46

Amount Paid: \$ 0.00

Amount Due: \$ 554.46, plus interest and penalty

#### **2nd Half**

Amount Billed: \$ 554.46

Amount Paid: \$ 0.00

Amount Due: \$ 554.46, plus interest and penalty

3. Delinquent General Taxes for the year 2017 .

Tax Account No.: 36334.0910

#### **1st Half**

Amount Billed: \$ 1,073.89

Amount Paid: \$ 0.00

Amount Due: \$ 1,073.89, plus interest and penalty

#### **2nd Half**

Amount Billed: \$ 1,073.90

Amount Paid: \$ 0.00

Amount Due: \$ 1,073.90, plus interest and penalty

4. 2017 City of Spokane Lien in the amount of \$1,971.77, plus interest

5. 2018 City of Spokane Lien in the amount of \$2,609.50, plus interest

6. Liability for any off record assessments, if any.

7. Judgment.

In Favor of:

Gretchen M Minch-Schroeder

Against:

Marcia Marie Meade and Mitchell Harrison Snow

Amount:

\$15,308.08, together with interest, costs and attorneys' fees, if any

Dated:

April 21, 2014

Filed:

April 21, 2014

Judgment No. (if applicable) :

14-9-03138-6

Case/Cause No.:

14-2-01411-7

**EXHIBIT** #1

Attorney for Judgment Creditor: Otto Matsch

Said Judgment was recorded as recording no. 6300628.

8. Warrant in favor of the State of Washington.  
Against: Marcia Marie Meade  
Amount: \$5,676.96, plus interest  
Filed: July 23, 2014  
Judgment/Warrant No.: 14-9-05495-5  
Case/Cause No.: 14-2-11969-5  
Department: Employment Security Department
9. Warrant in favor of the State of Washington.  
Against: Marcia Marie Meade and Edward A Dawson  
Amount: \$1,333.66, plus interest  
Filed: October 02, 2015  
Judgment/Warrant No.: 15-9-07355-9  
Case/Cause No.: 15-2-11950-2  
Department: Employment Security Dept
10. Warrant in favor of the State of Washington.  
Against: Marcia M Meade and Edward A Dawson  
Amount: \$1,550.02, plus interest  
Filed: April 03, 2017  
Judgment/Warrant No.: 17-9-02874-6  
Case/Cause No.: 17-2-11131-1  
Department: Employment Security Dept
11. Warrant in favor of the State of Washington.  
Against: Marcia Maria Meade and Edward Albert Dawson  
Amount: \$305.95, plus interest  
Filed: December 27, 2017  
Judgment/Warrant No.: 17-9-10138-9  
Case/Cause No.: 17-2-13556-3  
Department: Department of Labor & Industries
12. Warrant in favor of the State of Washington.  
Against: Marcia Maria Meade and Edward Albert Dawson  
Amount: \$207.63, plus interest  
Filed: February 12, 2018  
Judgment/Warrant No.: 18-9-00988-0  
Case/Cause No.: 18-2-10299-0  
Department: Department of Labor & Industries
13. Warrant in favor of the State of Washington.  
Against: Marcia Maria Meade dba Marcia M Meade and Edward A Dawson  
Amount: \$6,104.57, plus interest  
Filed: May 09, 2018  
Judgment/Warrant No.: 18-9-03515-5  
Case/Cause No.: 18-2-11034-8  
Department: Employment Security Dept
14. Warrant in favor of the State of Washington.  
Against: Marcia Maria Meade dba Marcia M Meade and Edward A Dawson  
Amount: \$6,104.57, plus interest  
Filed: May 09, 2018

Judgment/Warrant No.: 18-9-03516-3  
Case/Cause No.: 18-2-11035-6  
Department: Employment Security Dept

15. Warrant in favor of the State of Washington.  
Against: Marcia Maria Meade and Edward Albert Dawson  
Amount: \$319.40, plus interest  
Filed: May 10, 2018  
Judgment/Warrant No.: 18-9-03564-3  
Case/Cause No.: 18-2-11073-9  
Department: Department of Labor & Industries
16. Complaint/Notice of Violation/Non-Compliance regarding dangerous or sub-standard building and the lien of any assessment arising therefrom.  
By: City of Spokane  
Complaint No.: Undisclosed  
Dated: June 27, 2018  
Recorded: September 11, 2018  
Recording Information: 6741467
17. Pendency of Bankruptcy Proceedings under Chapter 11 in the United States District Court:  
  
Case No.: 18-01857-FPC11  
Filed: June 29, 2018  
Trustee/Receiver: US Trustee  
Bankrupt/Debtor: Edward A. Dawson and Marcia A. Meade dba Dawson & Meade, P.S. dba Dawson & Meade (Partnership)  
Attorney for Bankrupt/Debtor: Dan ORourke

Any transaction affecting the interest of said Bankruptcy must be made pursuant to proper court order, subject to the applicable appeal period.

18. We find no outstanding voluntary liens of record affecting subject property. An inquiry should be made concerning the existence of any unrecorded lien or other indebtedness which could give rise to any security interest in the subject property.
19. Any and all offers of dedication, conditions, restrictions, easements, boundary discrepancies or encroachments, notes and/or provisions shown or disclosed by Short Plat or Plat of Hughson and Chamberlin's Arlington Heights Second Addition recorded in Volume "C" of Plats, Page(s) 68.

**Informational Notes, if any**