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**FILED**

**JUN 23 2014**

SPOKANE COUNTY CLERK

**SUPERIOR COURT OF THE STATE OF WASHINGTON  
IN AND FOR THE COUNTY OF SPOKANE**

MITCHELL, ARCHIE and STORMIE )  
MITCHELL, husband and wife, )

Plaintiffs, )

vs. )

DURHEIM, GREG and JANE DOE )  
DURHEIM, husband and wife; CAROL )  
GROVES and JOHN DOE GROVES, wife and )  
husband, and WINDERMERE/MANITO, )  
LLC, a Washington limited liability company; )  
and PAUL SALERNO and JANE DOE )  
SALERNO (HEREINAFTER KIRANA )  
SALAMAT), husband and wife. )

No.: 2013-02-01539-5

**DEFENDANT PAUL SALERNO'S (PRO  
SE) ANSWER TO COMPLAINT AND  
COUNTERCLAIM**

Defendant, Paul Salerno, and Kirana Salamat in response to Plaintiff's Complaint  
answers as follows:

**I.**

In response to paragraphs 1.1, 1.2, 1.3 and 1.4, Defendant Paul Salerno, and Kirana  
Salamat are without sufficient information to form a belief and therefore deny the same.

In response to paragraph 1.5, Defendants Paul Salerno, and Kirana Salamat admit the  
same, however, they were not married until January 11<sup>th</sup>, 2013, and were not married at the time  
of the purchase and sale agreement.

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**II.**

In response to paragraph 2.1, Defendants, Paul Salerno, and Kirana Salamat admit that venue and jurisdiction are proper and deny the remaining allegations.

**III.**

In response to paragraphs 3.1, 3.2, Defendants, Paul Salerno, and Kirana Salamat were without sufficient information to form a belief and therefore deny the same.

In response to paragraphs 3.3, Defendants, Paul Salerno, and Kirana Salamat deny the same.

In response to paragraphs 3.4, Defendants, Paul Salerno, and Kirana Salamat are without sufficient information to form a belief and therefore deny the same.

In response to paragraphs 3.5, 3.6, Defendants, Paul Salerno, and Kirana Salamat admit.

In response to paragraphs 3.7, 3.8, 3.9, 3.10, 3.11 Defendants, Paul Salerno, and Kirana Salamat are without sufficient information to form a belief and therefore deny the same.

**IV.**

In response to paragraphs 4.1, Defendants, Paul Salerno, and Kirana Salamat are without sufficient information to form a belief and therefore deny the same.

**V.**

In response to paragraphs 5.1, 5.2 Defendants, Paul Salerno, and Kirana Salamat are without sufficient information to form a belief and therefore deny the same.

**VI.**

In response to paragraph 6.1, 6.2, Defendants, Paul Salerno, and Kirana Salamat are without sufficient information to form a belief and therefore deny the same.

VII.

In response to paragraph 7.1, Defendants, Paul Salerno, and Kirana Salamat deny the same.

DATED this 23 day of JUNE, 2014.



PAUL SALERNO, PRO SE  
Defendant

Having fully answered, Defendants, Paul Salerno, and Kirana Salamat asserts the following Counterclaim:

COUNTERCLAIM

I.

Plaintiffs, by and through their attorneys, have violated R.P.C. 3.1, 3.3 and 3.4 because there is no basis in law and fact, the action is frivolous and there is no basis in this case to modify existing law.

II.

WHEREFORE, as Plaintiffs and Plaintiff's counsel are in violation of R.P.C. 3.1, 3.3 and 3.4, Defendants have suffered damages in the form of attorney fees and costs. Having fully answered the Complaint and having set out a Counterclaim, Defendants, Paul Salerno, and Kirana Salamat, pro se seeks a Judgment as follows:

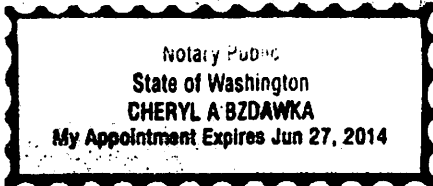
1. A dismissal of all of Plaintiff's claims against Defendants, Paul Salerno, and Kirana Salamat.
2. Recovery of any costs of Defendants, Paul Salerno, and Kirana Salamat and statutory attorney fees reasonable attorney s based upon the theory that there is no reasonable basis to bring this action against Defendants Paul Salerno and his wife Kirana Salamat.

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DATED THIS 23 day of JUNE, 2014.



Paul Salerno



Print Name Cheryl A Bzdukwa

NOTARY PUBLIC for the State of

Washington, residing in Spokane

My commission expires on June 27, 2014