

IN THE KING COUNTY DISTRICT COURT - WEST DIVISION
STATE OF WASHINGTON - SEATTLE COURTHOUSE

GLENN HAGELE - "COUNCIL)
FOR REFRACTIVE SURGERY)
QUALITY ASSURANCE")
)
Plaintiff,)
)
v.)
)
BRENT HANSON)
)
Defendant)
_____)

SMALL CLAIM NO. 85-11924

DEFENDANT'S MOTION TO QUASH
SERVICE OF SUMMONS –
SUPPLEMENT #1

DATE: February 12, 2009
TIME: 1:30 p.m.
ROOM: E-326

2) Background of Plaintiff

m) Notification to Defendant's Attorney Falsely Claiming Defendant is Under Investigation by the King County Prosecutor

On January 5, 2009 Plaintiff sent an e-mail to the defendant's attorney, which falsely stated that the Plaintiff had been contacted by the King County Prosecutor with respect to a criminal investigation of the Defendant. The e-mail stated:

Mr. Donohue (sic),

I have been contacted by Ian Goodhew, Deputy Chief of Staff, King County Prosecuting Attorney Office, 206-296-9064, regarding Mr. Hanson's recent distribution of a document that contains the name and Social Security number of a patient of Bossier Ophthalmology Clinic. Mr. Goodhew requested Brent Hanson's residence address. I have referred Mr. Goodhew to you for this information. You may elect to contact Mr. Goodhew directly.

Glenn Hagele¹

The Defendant forwarded the e-mail to the King County Prosecutor's office and received a direct response from Ian Goodhew, which showed Plaintiff's statements to be false.

¹ Exhibit 35 – E-mail sent from Plaintiff to Defendant's attorney in Sacramento, California, on January 5, 2009.

The e-mail stated:

Mr. Hanson,

The King County Prosecutor's Office was contacted by Mr. Hagele regarding a potential criminal complaint involving the dissemination of an individual's social security number. The King County Prosecuting Attorney's Office (KCPAO) does not investigate criminal complaints as we have no investigative tools available to our office. We do not charge criminal matters by grand jury in Washington State, we charge by Information based upon statements of probable cause sworn to by law enforcement officers.

I shared this information with Mr. Hagele and referred Mr. Hagele to the Kirkland Police Department. The police will or have determined whether or not the information provided by Mr. Hagele constitutes a criminal offense or not. Unless the King County Prosecutor's Office receives a referral from the Kirkland Police Department or other King County law enforcement agency for potential criminal charges, the KCPAO's involvement in this matter is concluded.

*Sincerely,
Ian Goodhew
KCPAO²*

WHEREFORE, for the foregoing reasons, Defendant respectfully requests that the Court enter an order to quash the service of summons.

This the 8th day of January, 2009.

Brent Hanson

Brent Hanson
31811 Pacific Highway S., B-169
Federal Way, WA 98003
Telephone: (919) 323-6030
Facsimile: (425) 650-3711

² Exhibit 36 – E-mail sent from the King County Prosecutor's office to Defendant on January 5, 2009.

Exhibit 35

Subject: FW: Request for Brent Hanson's residence address.
From: "Jim Donahue" <JDonahue@CDDLaw.com>
Date: Tue, 6 Jan 2009 08:50:50 -0800
To: "Brent Hanson" <brenthanson@comcast.net>

FYI

James R. Donahue
Caulfield, Davies and Donahue, LLP
1 Natoma Street
Folsom, California 95630
(916) 817-2900
(916) 817-2644 (fax)

From: Glenn Hagele - USAEyes.org [mailto:glenn.hagele@usaeyes.org]
Sent: Monday, January 05, 2009 8:22 PM
To: Jim Donahue
Cc: dfoos@bowmanfoos.com
Subject: Request for Brent Hanson's residence address.

Mr. Donohue,

I have been contacted by Ian Goodhew, Deputy Chief of Staff, King County Prosecuting Attorney Office, 206-296-9064, regarding Mr. Hanson's recent distribution of a document that contains the name and Social Security number of a patient of Bossier Ophthalmology Clinic. Mr. Goodhew requested Brent Hanson's residence address. I have referred Mr. Goodhew to you for this information. You may elect to contact Mr. Goodhew directly.

Glenn Hagele
8543 Everglade Dr
Sacramento CA 95826-3616
USA

Home: 916/381-2442
Mobile: 916/203-2442
Fax: 916/650-1241

<http://www.GlennHagele.com>

This transmission may contain information that is privileged, confidential and/or exempt from disclosure under applicable law. If you are not the intended recipient, you are hereby notified that any disclosure, copying, distribution, or use of the information contained herein (including any reliance thereon) is STRICTLY PROHIBITED. If you received this transmission in error, please immediately contact the sender and destroy the material in its entirety, whether in electronic or hard copy format.

This transmission is on behalf of Glenn Hagele, an individual, and is not endorsed, submitted, or representative of any other organization or entity. Copyright 2008 Glenn Hagele, all rights reserved.

Exhibit 36

From: Goodhew, Ian <Ian.Goodhew@kingcounty.gov>
To: brentahanson@aim.com
Cc: glenn.hagele@usaeyes.org; attorney@klinelaw.org; questions@klinelaw.org; jon.sasser@elliswinters.com; dfoos@rbowmanlaw.com; holladay@docholladay.com; see2020@buffingtoneyecare.com; ccoble@brookspierce.com; jdonahue@CDDLlaw.com
Subject: RE: Glenn Hagele
Date: Tue, 6 Jan 2009 1:06 pm

Mr. Hanson,

The King County Prosecutor's Office was contacted by Mr. Hagele regarding a potential criminal complaint involving the dissemination of an individual's social security number. The King County Prosecuting Attorney's Office (KCPAO) does not investigate criminal complaints as we have no investigative tools available to our office. We do not charge criminal matters by grand jury in Washington State, we charge by Information based upon statements of probable cause sworn to by law enforcement officers.

I shared this information with Mr. Hagele and referred Mr. Hagele to the Kirkland Police Department. The police will or have determined whether or not the information provided by Mr. Hagele constitutes a criminal offense or not. Unless the King County Prosecutor's Office receives a referral from the Kirkland Police Department or other King County law enforcement agency for potential criminal charges, the KCPAO's involvement in this matter is concluded.

Sincerely,

Ian Goodhew
KCPAO

From: brentahanson@aim.com [<mailto:brentahanson@aim.com>]
Sent: Tuesday, January 06, 2009 12:46 PM
To: Goodhew, Ian
Cc: glenn.hagele@usaeyes.org; attorney@klinelaw.org; questions@klinelaw.org; jon.sasser@elliswinters.com; dfoos@rbowmanlaw.com; holladay@docholladay.com; see2020@buffingtoneyecare.com; ccoble@brookspierce.com; jdonahue@CDDLlaw.com
Subject: Glenn Hagele

To: Ian Goodhew
CC: Glenn Hagele, Executive Director of CRSQA and Cataract Free America
Ray Kline, Jon Sasser, David Foos, Attorneys for Glenn Hagele,
Robert Buffington and Jack Holladay, Trustees for CRSQA, which sent me an unsolicited document containing private information of a CRSQA patient
Charles Coble, Attorney for Dr. Luranell Burch

Glenn Hagele recently sent the following message to my attorney:

*From: Glenn Hagele - USAEyes.org [<mailto:glenn.hagele@usaeyes.org>]
Sent: Monday, January 05, 2009 8:22 PM
To: Jim Donahue
Cc: dfoos@bowmanfoos.com
Subject: Request for Brent Hanson's residence address.*

*Mr. Donohue (sic),
I have been contacted by Ian Goodhew, Deputy Chief of Staff, King County Prosecuting Attorney Office, 206-296-9064, regarding Mr. Hanson's recent distribution of a document that contains the name and Social Security number of a patient of Bossier Ophthalmology Clinic. Mr. Goodhew requested Brent Hanson's residence address. I have referred Mr. Goodhew to you for this information. You may elect to contact Mr. Goodhew directly.*

Glenn Hagele

Glenn Hagele and his organizations "CRSQA" and "Cataract Free America" regularly file complaints against me with government agencies, and I will provide the same documents to you which I am providing to the other agencies. You can download them here:

- http://www.lasikfraud.com/crsqa/brent_hanson/85-011924/motion_to_quash-1-public-version.pdf
- http://www.lasikfraud.com/crsqa/brent_hanson/85-011924/motion_to_quash-1-affidavit-signature.pdf
- http://www.lasikfraud.com/crsqa/brent_hanson/85-011924/motion_to_quash-1-exhibits.pdf
- http://www.lasikfraud.com/crsqa/brent_hanson/85-013855/motion_to_quash-1-affidavit-signed.pdf
- http://www.lasikfraud.com/crsqa/brent_hanson/85-013855/motion_to_quash-1.pdf
- http://www.lasikfraud.com/crsqa/brent_hanson/usaeyes.us/FA0812001237910_response_redacted.pdf
- http://www.lasikfraud.com/crsqa/brent_hanson/usaeyes.us/FA0812001237910_response_redacted.pdf

Many of the documents contained redactions because they include depositions of Glenn Hagele. If you require the full versions, you can go to the small claims court in the same building in which you work, and see if the court will allow you access to the documents and videos. It is possible that the documents in the case 85-013855 are no longer present, as that case has been dismissed.

Sincerely,
Brent Hanson

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