

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

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

SMALL CLAIM NO. 85-11924
DEFENDANT'S MOTION TO DISMISS
FOR LACK OF JURISDICTION

DATE: February 12, 2008
TIME: 1:30 p.m.
ROOM: E-326

Defendant moves the court to dismiss the Plaintiff's complaint for lack of jurisdiction over the Defendant, as neither the Plaintiff nor the Defendant are residents of King County. In dismissing the complaint, the Court would not be unfairly denying the Plaintiff an opportunity to have his complaint heard, as there are two courts in which the case may be properly heard:

1. **Thurston County District Court – Small Claims Division.** The Defendant became a resident of Thurston County in November 2008 and is subject to that court's jurisdiction.
2. **California Superior Court. Hagele v Hanson 06AS00839.** This is an ongoing case from 2006 in which the Plaintiff is representing himself *pro per*. The Plaintiff is in the process of currently amending his complaint, and is able to file motions to further amend his complaint if desired.

For example, Plaintiff is in the process of amending his complaint to seek damages for "defamatory" statements Defendant wrote in previous responses to the King County District Court.¹ Given the fact that the Plaintiff is representing himself *pro per*, it is likely that the Court in Sacramento will grant the Plaintiff license to freely amend his complaint at will.

¹ Exhibit 49 – Plaintiff's letter to Defendant's attorney, dated January 9, 2009 - "Stipulation to Motion to Amend Complaint".

WHEREFORE, for the foregoing reasons, Defendant respectfully requests that the Court dismiss Plaintiff's claim for lack of jurisdiction.

This the 28th day of January, 2009.

Brent Hanson

Brent Hanson

P.O. Box 1261
Olympia, WA 98507-1261

Telephone: (919) 323-6030
Facsimile: (425) 650-3711

Exhibit 49

Glenn Hagele

8543 Everglade
Sacramento CA 95826

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

Friday, January 09, 2009

James R. Donahue, SBN 105106
Caulfield, Davies & Donahue, LLP
Post Office Box 277010
Sacramento, CA 95827-7010
Telephone: (916) 817-2900
Facsimile: (916) 817-2644

Attorneys for Hanson
Hagele v Hanson 06AS00839

re: Stipulation to Motion to Amend Complaint

Mr. Donahue,

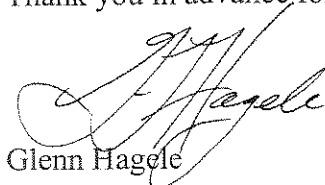
Mr. Hanson has published and distributed new defamatory statements about me as recently as last week. Hanson has re-distributed previous defamatory statements about me through additional websites, bulletin boards, emails, mail, and faxes. Additional co-defendants have been identified who conspired with Hanson to perpetuate his acts and to perpetrate acts of their own with assistance from Hanson.

For these reasons I seek to amend the complaint. I have no doubt that I would prevail with a formal motion, however in the interest of efficiency I seek your cooperation in a stipulation to amend the complaint.

Please respond within 14 days regarding Defendant's position on a stipulation to amend complaint.

If you have any concerns or questions regarding the subject matter of this correspondence or if the stated understanding of any relevant fact is inconsistent with your understanding of the fact, notify me immediately. Otherwise I will assume you concur with all statements of fact as presented.

Thank you in advance for your prompt attention to this matter.



Glenn Hagele