L24-317

IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON
FOR GRANT COUNTY

OBSIDIAN SPECIALTY INSURANCE COMPANY, a New York company,

Plaintiff,

vs.

CHUY'S CONSTRUCTION, LLC., a Washington limited liability company,

Defendant.

NO. 25-2-01794 13

SUMMONS

TO THE DEFENDANT(S):

A lawsuit has been started against you in the above-entitled Court by Obsidian Specialty Insurance Company, a New York company, plaintiff. Plaintiff's claim is stated in the written complaint, a copy of which is served upon you with this summons.

In order to defend yourself against this lawsuit, you must respond to the complaint by stating your defense in writing, and serve a copy upon the undersigned attorney for the plaintiff within 20 days after the service of this summons (or 60 days if served out of the State of Washington), excluding the day of service, or a default judgment may be entered against you without notice. A default judgment is one where the plaintiff is entitled to what he asks for because

LAW OFFICE OF BENJAMIN E. KELLY PS
9218 ROOSEVELT WAY NE
Seattle, WA 98115
PH: 206-365-9090; FAX: 206-365-0575
LEGAL@BENKELLYLAW.COM

you have not responded. If you serve notice of appearance on the undersigned attorney, you are entitled to notice before a default judgment may be entered.

You may demand that the plaintiff file this lawsuit with the Court. If you do so, the demand must be in writing and must be served upon the person signing this summons. Within 14 days after you serve the demand, the plaintiff must file this lawsuit with the Court, or the service on you of this summons and complaint will be void.

If you wish to seek the advice of an attorney in this matter, you should do so promptly so that your written response, if any, may be served on time.

This summons is issued pursuant to Rule 4 of the Superior Court Civil Rules of the State of Washington.

Dated: December 16, 2025.

LAW OFFICE OF BENJAMIN E. KELLY PS

By: _____
BENJAMIN E. KELLY, WSBA #39560
Attorney for Plaintiff

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COMPLAINT

COMES NOW THE PLAINTIFF and for cause of action against the defendant, complains and alleges as follows:

I.

Plaintiff provides insurance services in interstate commerce.

II.

Plaintiff provided such services to Defendant, policy #SCB-GL-000004704 (the "Policy").

III.

The Policy required the debtor to pay an audit premium.

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IV.

Defendant did not pay the audit premium.

V.

Defendant's principal place of business is located in Quincy, Grant County, Washington.

VI.

Defendant has owed $31,876.19 to Plaintiff since December 6, 2023.

Plaintiff respectfully requests that the Court enter a judgment against Defendant in the amount of $31,876.19 plus interest from December 6, 2023 plus costs and attorneys fees.

Dated: December 16, 2025.

LAW OFFICE OF BENJAMIN E. KELLY PS

By: _____
BENJAMIN E. KELLY, WSBA #39560
Attorney for Plaintiff

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Seattle, WA 98115
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