

IN THE DISTRICT/SUPERIOR COURT FOR THE STATE OF ALASKA
THIRD JUDICIAL DISTRICT AT KODIAK

Robert Fox,
Plaintiff,
vs.
Tanya Ward AKA et al,
Defendant.

CASE NO: 3KO-20-00020CI

**SUMMONS AND NOTICE TO BOTH
PARTIES OF
JUDICIAL ASSIGNMENT**

To Defendant: Archie Lee Peterson

You are hereby summoned and required to file with the court a written answer to the complaint which accompanies this summons. Your answer must be filed with the court at 204 Mission Road Kodiak, AK 99615 within 20 days* after the day you receive this summons.

In addition, a copy of your answer must be sent to:
Plaintiff's attorney or plaintiff (if unrepresented): Elizabeth W Fleming
Address: 104 Center Ave Ste 201A Kodiak AK99615

If you fail to file your answer within the required time, a default judgment may be entered against you for the relief demanded in the complaint.

If you are not represented by an attorney, you must inform the court and all other parties in this case, in writing, of your current mailing address and any future changes to your mailing address and telephone number. You may use court form *Notice of Change of Address / Telephone Number* (TF-955), available at the clerk's office or on the court system's website at <https://public.courts.alaska.gov/web/forms/docs/tf-955.pdf>, to inform the court.

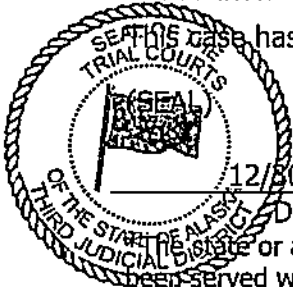
-OR-

If you have an attorney, the attorney must comply with Alaska R. Civ. P. 5(i).

NOTICE OF JUDICIAL ASSIGNMENT

To: Plaintiff and Defendant

This case has been assigned to Judge Stephen B Wallace.



12/30/2020
Date

By: *Paige Thies*
Deputy Clerk

If you are a state or a state officer or agency named as a defendant has 40 days to file its answer. If you have been served with this summons outside the United States, you also have 40 days to file your answer.

I certify that on 12/30/20
a copy of this order was mailed or delivered to:

Fleming
Clerk: PTThies

Elizabeth W. Fleming
104 Center Ave. Suite 201A
Kodiak, AK 99615
907 512 0790
ewfleming@lawonkodiak.com

IN THE SUPERIOR COURT FOR THE STATE OF ALASKA
THIRD JUDICIAL DISTRICT AT KODIAK

ROBERT FOX,

Case No.: 3KO 20-20 *CI*

Plaintiff,
vs.

TANYA WARD, a/k/a TANYA HICKS
NICOLAS CANAVARRO,
ARCHIE LEE PETERSON,
THOMAS DAVID PETERSON,
JUDY ANN YOUNG / PETERSON
EMERY DOYLE SKOLFIELD
TERESA MARIE PETERSON
JONATHON DUFFY PETERSON
JOSEPH NELS JENKINS
and all persons and parties
unknown claiming a right, title, estate, lien,
or interest in the real estate described in the
Complaint in this action, commonly described
as NHN Uyak Bay, Amook Island, T31S R
29W TL-1202, Kodiak, Alaska, 99615
Defendants.

COMPLAINT TO ESTABLISH TITLE AGAINST ALL THE WORLD AND
TO QUIET TITLE, 09.45.010

Plaintiff files this Complaint to establish title against all the world and
states as follows:

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JURISDICTION AND VENUE

1. Jurisdiction is appropriate under AS § 22.10.020.
2. Venue is appropriate in the Superior Court for the Third Judicial District at Kodiak in that the real property involved is situated in the Borough of Kodiak. Rule 3(b), Ak.R.Civ.Pr.

REAL PROPERTY

3. The land to which Plaintiff seeks to establish his title is all that tract or parcel of land more particularly described as follows:

Fractional NW ¼ SW ¼ NW ¼ of Protracted Section 12
Township 31 South Range 29 West Seward Meridian,
located in the Kodiak Recording District, Third Judicial
District, State of Alaska, commonly described as NHN
Uyak Bay, T31S R 29W TL-1202, Amook Island, Kodiak,
Alaska, 99615.
4. This property was subject to a Quit Claim Deed from Nicolas Canavarro to Tanya Marie Ward, a/k/a Tanya Hicks, recorded as 2002-003812-0, Recording District 303 – Kodiak, on 12/26/2002 at 1:32 p.m. Exhibit 1.
5. In 2010, the Clerk of Court issued a “clerk’s deed” to said real estate recorded at 2010-00122-0, Recording District 303 – Kodiak, on 7/7/2010 at 2:43 p.m. Exhibit 2.
6. Plaintiff paid \$3,652.33 to the Kodiak Island Borough for all back taxes owed on the land due to the Borough foreclosure in 2010. Exhibit 3, Deed

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COMPLAINT for Quiet Title

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of Repurchase recorded as 2019-0008780-0, Recording District 303 – Kodiak, on 5/17/2019 at 1:51 p.m. .

7. For valuable consideration, Defendant Tanya Marie Hicks, a/k/a Tanya Ward, conveyed all of her interest in said property to Plaintiff via quit-claim-deed recorded as 2019-000876-0, Recording District 303 – Kodiak, on 6/5/2019 at 8:14 a.m. Exhibit 4.

PARTIES

8. Plaintiff is Robert P. Fox, is a resident of the State of Alaska living in Fairbanks, Alaska. He is the bona fide purchaser of the land described above through a tax sale in the Kodiak Island Borough.
9. Plaintiff is aware of the possibility of adverse claims by former owners, unknown heirs, and unknown persons. Known persons having a potential interest in this action include:

Nicolas D. Canavarro
815 Pacific Ave. Apt. 6
Santa Cruz, CA 95060
831-854-8738

Tanya Hicks Ward
3670 Harris St.
La Mesa CA 91941

Emery Doyle Skolfield
13617 Ellendale Dr.
Chantilly, VA 20151
703-378-1481

Thomas David Peterson
2451 Woodcrest Dr.
Chaska, MN 55318
952-212-1191

Thomas David Peterson
4036 Pula Pula Pl.
Lihue, HI 96766

Judy Ann Peterson/Young
602 Ester Way
Watsonville, CA 95076
831-241-3829

Joseph Nels Jenkins
135 S. 329th Pl. Apt. B (or
34B)
Federal Way, WA 98003
253-838-8068

Jonathon Duffy Peterson
1510 Roundup Dr.
Eugene, OR 97401
541-606-4730
Jondpeterson1230@gmail.com

Teresa Marie Peterson
109 Escalona Dr.
Santa Cruz, CA 95060

Teresa Marie Peterson
180 Franiush Dr.
Watsonville, CA 95076

Archie Lee Peterson
146 Ridgeline Loop, Apt. A
Anchorage, AK 99501
archielp@yahoo.com

CAUSE OF ACTION

10. The proceeding is brought to quiet title as title gained through a tax sale
is unmarketable and Plaintiff desires to be able to obtain financing or sell
said property.

11. The proceeding is likewise brought to complete title previously obtained by quit-claim deed, as such title is unmarketable and Plaintiff desires to be able to obtain financing or sell said property.

12. Plaintiff cannot immediately or effectually maintain or protect his rights by any other course other than the filing of this action, and is without an adequate remedy at law, and requires a remedy in equity, else Plaintiff will suffer irreparable damage.

lis pendens

13. As authorized by AS §09.45.940, a notice of *lis pendens* is being filed contemporaneously with this COMPLAINT.

JURY DEMAND

14. Plaintiff demands a trial by jury.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff prays for the following:

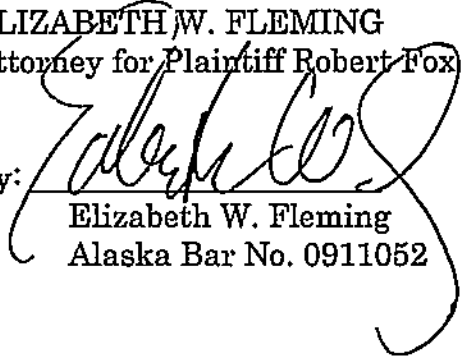
That the court take jurisdiction of this matter as an action in the nature of equity, *in rem*, and *in personam* over properly served Defendants;

That, subject to the right of appeal, Plaintiff have a judgment establishing his title in said lands against all the world and that all clouds to Plaintiff's title to said land be removed;

That Plaintiff have other such and further relief as may be legal,
equitable, just, and proper.

ELIZABETH W. FLEMING
Attorney for Plaintiff Robert Fox

By:


Elizabeth W. Fleming
Alaska Bar No. 0911052

Elizabeth W. Fleming
Colonel, USAR Retired
104 Center Ave. Suite 201A
Kodiak, AK 99615
907 512 0790
ewfleming@lawonkodiak.com