Housing WA. ANNUAL CONFERENCE

Default Evictions and the Pipeline to Homelessness

2026

Speakers:

Hannah Swenson – Managing Attorney

- King County Bar Association Housing Justice Project

Andy Dugan – Executive Director

- Skagit Legal Aid

Ami Manning – Founder

- Experience Matters

Bonnie Rosinbum – Eviction Defense Program Counsel

- Washington State Office of Civil Legal Aid

Agenda:

- Introduction to default evictions
- Research on default evictions from University of Washington
- Real-life consequences of default evictions for tenants
- Recent default research in Spokane County
- Strategies for reducing default evictions
- Questions

Introduction to Default Evictions

The legal pipeline to homelessness

WHAT.

SN: 4
PC: 4

FILED
SEP 24 2025
TIMOTHY W. FITZGERALD
SPOKANE COUNTY CLERK

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

ANDY W. LOUIE PLAINTIFF,

VS

[redacted]
AND ALL OTHER OCCUPANTS
AT 2421 E WEILE
DEFENDANTS,

Case No [redacted]

MOTION AND ORDER OF DEFAULT; FINDINGS OF FACT AND CONCLUSIONS OF LAW; JUDGMENT; AND ORDER FOR WRIT OF RESTITUTION

I. JUDGMENT SUMMARY

☐ The Judgment summary does not apply.
x The Judgment summary is as follows:

A. Judgment Creditor: Andy Louie
B. Judgment Debtor: [redacted]
C. Principal Judgment amount.....$ 10728.50
D. Interest to date of Judgment.....$
E. Attorney's fees.....$
F. Costs.....$ 385.00
G. Other recovery amount.....$
H. Principal judgment shall bear interest at 12 % per annum.
I. Attorney's fees, costs and other recovery amounts shall bear interest at 12 % per annum.
J. Attorney for Judgment Creditor
K. Attorney for Judgment Debtor

II. MOTION

Plaintiff moves for default and judgment against defendants herein. The basis for venue is residence of the defendant(s) within this county at [redacted] Washington Defendant(s) has not appeared and no answer has been filled or served herein.

HOW.

The "gotcha" moments

Response to Summons

HOW TO RESPOND: Phone calls to your Landlord or your Landlord's lawyer are not a response. You may respond with a "notice of appearance." This is a letter that includes the following:

(1) A statement that you are appearing in the court case

(2) Names of the landlord(s) and the tenant(s) (as listed above)

(3) Your name, your address where legal documents may be sent, your signature, phone number (if any), and case number (if the case is filed)

This case ☒ is / ☐ is not filed with the court. If this case is filed, you need to also file your response with the court by delivering a copy to the clerk of the court at:

Spokane County Clerk's Office, 1116 W. Broadway Avenue, Room 300, Spokane, WA 99260
Open Monday through Friday 8:30 a.m. – 4:00 p.m. (Closed all Federal Holidays)

WHERE TO RESPOND: You must mail, fax, or hand deliver your response letter to your Landlord's lawyer, or if no lawyer is named in the complaint, to your Landlord. If you mail the response letter, you must do it 3 days before the deadline above. Request receipt of a proof of mailing from the post office. If you hand deliver or fax it, you must do it by the deadline above. The address is:

Appearance in Court

*RCW 59.18.412 (remote appearance)

May 5, 2026

[redacted]

Re: Fair Debt Collection Practices Act,
Debt Validation Letter

Dear [redacted]

The undersigned on behalf of your landlord, Hideaway Community, LLC, hereby demands payment of monies allegedly due and owing arising out of your lease agreement for the real property commonly known as [redacted] Spokane, Washington. Pursuant to potential application of Federal Law, we are sending this letter in an attempt to collect a debt, any information provided may be used in a court of law, and to provide you with the following information:

(1) The amount of the debt is $[redacted] This debt arises out of your alleged breach of your lease agreement.

(2) The name of the creditor to whom the debt is owed is [redacted]

(3) Unless you, within thirty (30) days after receipt of the notice, dispute the validity of the debt, or any portion thereof, the debt will be assumed to be valid;

(4) If you notify the undersigned on behalf of Hideaway Community, LLC, in writing within thirty (30) days that the debt, or any portion thereof, is disputed, the undersigned on behalf of Hideaway Community, LLC, will obtain verification of the debt or a copy of a judgment against you and a copy of such verification or judgment will be mailed to you; and

1319 W. DEAN AVENUE
SPOKANE, WA 99201
(509) 325-8777 • FAX (509) 444-1111

SUPERIOR COURT, STATE OF WASHI

[redacted]
Washington Limite (509) 444-1111 (fax)
Company,

COURT DATE: If you respond to this Summons, you will be notified of your hearing date in a document called an "Order to Show Cause." This is usually mailed to you. If you get notice of a hearing, **you must go to the hearing**. If you do not show up, your landlord can evict you. Your landlord might also charge you more money. If you move before the court date, you must tell your landlord or the landlord's attorney.

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(509) 444-1111 Fax

EVICTION SUMMONS - page 3 of 4

[redacted]

respond by the deadline above, you wi right to defend yourself or be represented by a lawyer if you cannot afford one in court and could be evicted. The court may be able to appoint a lawyer to represent you without cost to you if you are low-income and are unable to afford a lawyer. If

SUPERIOR COURT, STATE OF WASHINGTON, COUNTY OF SPOKANE

[redacted] a Washington Limited Liability Company,

Plaintiff,

vs

[redacted] a single person, [redacted] a single person, and all other subtenants,

Defendants.

N[redacted]

COMPLAINT FOR UNLAWFUL DETAINER AND DAMAGES (RCW 59.20 et seq. and/or RCW 59.18 et seq as Applicable)

COMES NOW the Plaintiff, [redacted] by and through its attorney of record, [redacted] and for cause(s) of action against the Defendants alleges as follows:

I. PARTIES AND JURISDICTION

1.1 Plaintiff, [redacted] is now and was at all times material hereto a duly licensed Washington Limited Liability Company doing business in Spokane County, Washington. Plaintiff is the owner of real property and mobile home lot commonly known as the [redacted] Plaintiff is

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Between 8 - 150 pages

PC: 2

MAY 01 2026

Timothy W. Fitzgerald
SPOKANE COUNTY CLERK

SUPERIOR COURT, STATE OF WASHINGTON, COUNTY OF SPOKANE

[redacted] a Washington Limited Liability Company,

Plaintiff,

vs

[redacted]

and all other subtenants,

Defendants.

No [redacted]

ORDER TO SHOW CAUSE WHY WRIT OF RESTITUTION SHOULD NOT BE ISSUED

☒ Clerk's Action Required

I. BASIS

Plaintiff moved the Court for an order to show cause why a Writ of Restitution should not be issued restoring Plaintiff to possession of the property described in Plaintiff's complaint.

II. FINDINGS

After reviewing the case records to date and the basis for the motion, the court finds that Good cause exists to grant the motion in that: Defendants are allegedly delinquent in rent payments; and Defendants have allegedly failed to pay the total amount of rent

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due or vacate after service of Notice to Pay Rent or Vacate.

III. ORDER

Now, therefore, it is hereby ordered, adjudged, and decreed that Defendants, [redacted] and all other subtenants, appear at courtroom 400 for Unlawful Detainer Docket (or as otherwise directed by the Court) of the Spokane County Superior Court, W. 1116 Broadway, Spokane, Washington, on May 27, 2026, at 9:00 A.M., and show cause, if any, why a Writ of Restitution should not be entered restoring Plaintiff to possession of the property named in Plaintiff's complaint.

If you fail to appear and show cause at the time and place specified by this order, the Court may order the Sheriff to restore possession of the property to the Plaintiff and may grant such other relief as may be prayed for in the Complaint and provided for in RCW 59.20, et seq, including Judgment against you.

DONE IN OPEN COURT this 1 day of ~~April,~~ May 2026.

JUDGE/~~COURT COMMISSIONER~~

CANDIE M. DIBBLE

Presented by:

[redacted]

Attorney for Plaintiff

EMS/ts

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Default or Denied

Response	Defaulted	Denied
Tenant responded by text message timely before response deadline	X	
Tenant responded and appeared for the hearing, but was 30 minutes late to court because their bus had been late on the route	X	
Tenant failed to respond but landlord failed to show adequate proof of service	X	X
Tenant responded but did not appear on their hearing date. In their written response they said they were elderly in a wheelchair with no ride to court	X	
Elderly tenant's son appeared in court for them, advising the tenant was in the hospital with pneumonia	X	

Enforcement:

- Service of Writ by Sheriff → 3-5 court days
- Factors affecting enforcement timeline
- Accidents?

REMEDIES

- Motion to Stay Enforcement
- Motion to Vacate Default Judgment/Quash Writ
- Reinstatement of Tenancy RCW 59.18.410

Default Eviction Research

Findings from University of Washington Evans School of Public Policy and Governance

Default Eviction Rates by County

- Evictions by Default Judgment in Washington State
  - July 9. 2024
  - Will von Geldern, MPA
  - Karin Martin, Ph.D.
  - Rachel Fyall, Ph.D.
- Snapshot data looking at cases filed in January and February 2024 across six counties in Washington

Default Eviction Rates by County: Key Findings

- Default judgment rates varied significantly by county, from 20.9% in Clark County to 48% in Snohomish County
- Cases in which eviction summonses were served prior to cases being filed in court lead to disproportionate share of *ex parte* defaults
- Evidence suggests that formal policies and informal practices influence the prevalence and type of default judgments

Default Rates and Types by County

County	Total UD Filings	Ex Parte Defaults	Hearing Defaults	Total Defaults
Clark	374	2 (0.5%)	76 (27.2%)	**78 (20.9%)**
Kitsap	83	30 (36.1%)	6 (15.8%)	36 (43.4%)
Pierce	566	135 (23.9%)	88 (23%)	223 (39.4%)
Skagit	59	0 (0%)	16 (30.8%)	**16 (27.1%)**
Snohomish	370	135 (36.5%)	48 (29.3%)	178 (48%)
Spokane	418	83 (19.9%)	82 (29.1%)	165 (39.5%)
TOTAL	1,870	385 (20.6%)	316 (26.4%)	701 (37.5%)

Why do tenants default?

- No Right to Counsel: Evictions, Administrative Burden, and Access to Civil Justice
  - Stanford Law & Policy Review (2025)
  - Will von Geldern
  - Dr. Karin D. Martin
- Analysis of court records and interviews with 23 tenants in Pierce County who had defaulted

Administrative Burdens

- “Evictions disproportionately impose learning, compliance, and psychological costs…on the people least equipped to navigate consequential legal proceedings on their own, and these sources of burden are insurmountable for many tenants despite the hypothetical availability of legal aid”

Administrative Burdens – Examples of Each Type

Learning Costs

- Understanding and interpreting complex legal jargon, rules, and deadlines

Compliance Costs

- Time off work, transportation, childcare, etc. to attend court hearings

Psychological Costs

- Internalized and societal stigma related to poverty, eviction, and the potential consequences for remaining housed

Barriers to Accessing Civil Court Processes

- “Although personal circumstances varied, a significant majority of study participants described challenges which would exacerbate the difficulties of overcoming administrative burdens for anyone.”

Tenant perspective: Domestic Violence

- “I was going through a domestic violence situation, so I wasn't home a lot because I didn't want to be home. My ex was kicking my door in and doing all kinds of crazy stuff, messing up my car, and I was stuck because my car broke down because he had sabotaged it. So I didn't get the notices, I didn't know. And he was checking my mail, taking my mail out of the mailbox. He took the notices off the door.”

Tenant perspective: Technological Barriers

- “I went to the court date. I was on time, everything, but they had me waiting in the queue, and I was there literally for hours. And the judge ended up granting them the eviction because of a no-show, but literally something told me to screenshot every few minutes that I was in queue, just for evidence that I was there. And I did that. And I ended up needing it ... I was there, I was just waiting. I just wasn't granted access into the court.”

Tenant perspective: Health-Related Job Loss

- “I think that just the shamefulness of all of it . .. I've never been evicted before. Up until I got sick, I had a perfect rental history. I paid on time. I even did things to beautify the apartment that I had at my cost. And when I got sick, it affected . . .my memory and it affected my whole life in general. And so I became very avoidant to everything in my life . .. they had to go through the process because I wasn't communicating.”

The Human Impact of Eviction in Washington State

Eviction as a housing-stability, health, financial, and community issue.



My story and why this matters to me and why it should matter to you…

Some statistics

- Between 2013 and 2017, 1 in 55 Washingtonian adults had an eviction (130,203 adults which equals 1.8% of the State's adult population) 1 In 2026, that number has risen to 1 in 45. [3]
- 46% of renters in Washington State are rent-burdened. [3]
- **324,572 eviction filings** in the 12 months ending July 2026. July 2026 was the highest monthly filing count on record.

1 Thomas, Timothy A., et al. *The State of Evictions: Results from the University of Washington Evictions Project*. University of Washington, 6 Jan. 2020, https://evictionresearch.net/washington/report/State_of_Evictions_2020/.
2 https://uarizona.neotalogic.com/a/costofevictioncalculator
3 https://evictionresearch.net/washington/

Financial impact on households

- UW found that the overwhelming majority of formal evictions in its historical Washington data were associated with falling behind on rent.
- More than one-third of defendants in the study were spending over **80% of income on rent**.

This illustrates how little financial capacity many households have to absorb an income or expense shock.



Mental and physical health

- Washington's appointed-counsel evaluation documents tenants reporting significant stress and anxiety associated with eviction proceedings.
- Interview participants described eviction occurring alongside disability, illness, family health crises, employment problems, and other hardships.



The UW evaluation includes qualitative evidence of tenants experiencing severe psychological distress during eviction cases.

Employment and daily-life disruption

- Tenants facing eviction frequently experience employment and financial difficulties simultaneously.
- Lack of reliable transportation, internet, or phone access can make responding to an eviction case more difficult.
- For families with children this can disrupt schooling, caregiving, services, medical care and other community connections

Eviction can therefore compound existing instability rather than occur as an isolated event

Housing instability and homelessness

- UW research concludes that evictions contribute to homelessness in the context of rising rents, inadequate affordable housing, and rent burden.
- Washington lost substantial numbers of affordable rental units during the period studied.
- Housing instability is therefore part of a broader affordability problem—not simply an individual tenant failure.

Eviction can turn a short-term crisis into prolonged homelessness

26%
of unhoused Seattle respondents reported being evicted from their last residence. CSDE

16%
of people exiting King County/Seattle federal housing assistance experienced homelessness within one year. Taylor & Francis Online

41 months
average duration of the current homelessness episode among a Seattle sample of adults experiencing homelessness. PubMed Central (PMC)

22.9 months
additional homelessness associated with legal-fine debt in that Seattle study—not eviction itself.

Spokane County Default Eviction Research Lab

Why?

Scope?

How?

KING COUNTY BAR ASSOCIATION

HOUSING JUSTICE PROJECT

Jan – Dec 2025 Findings

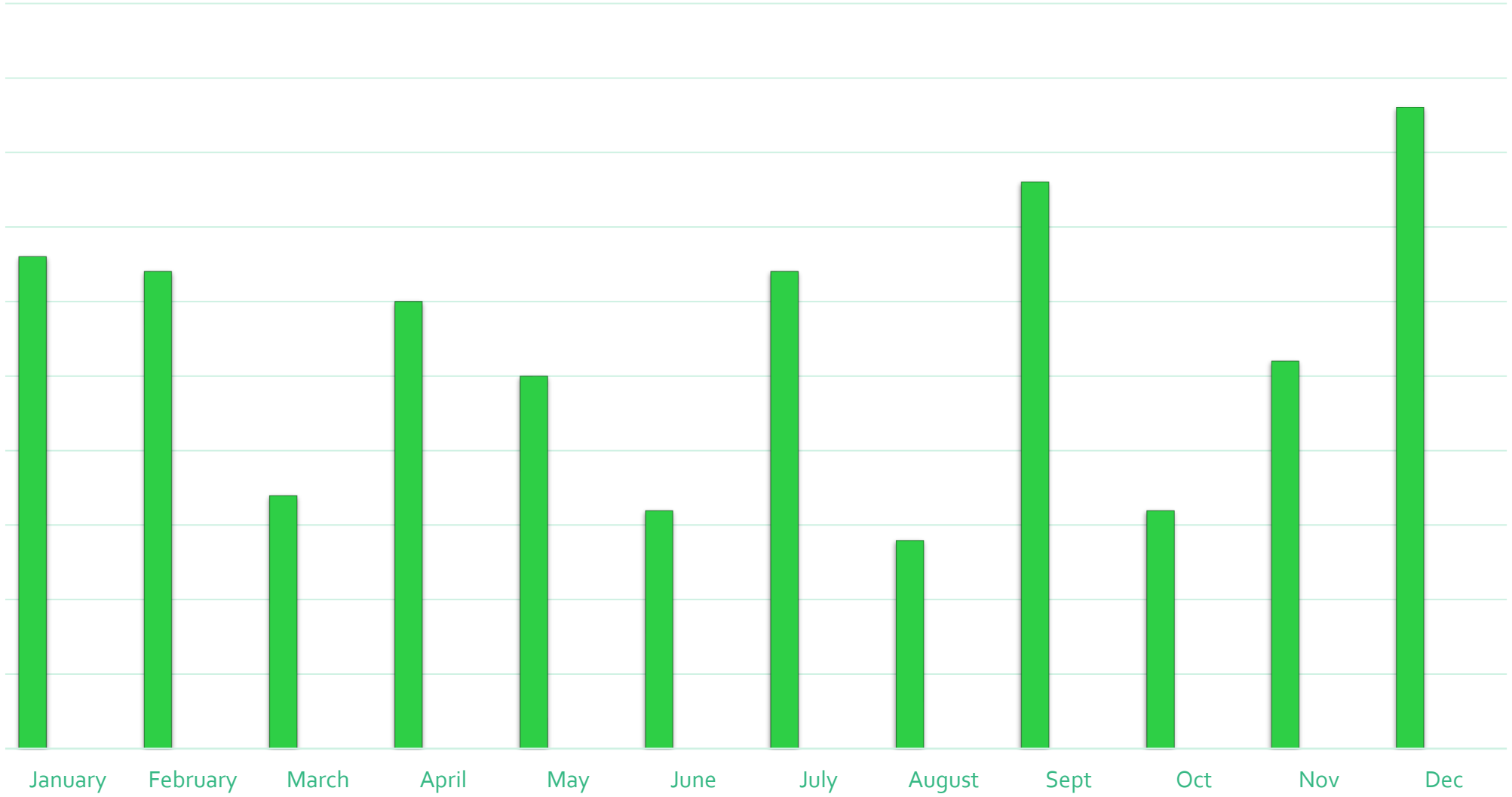
How / How Many 1,794 cases filed

- 21% of households are defaulted at any given hearing date
- Up to 25% of households are defaulted by *ex parte* in any given month

Who

- 72% of default evictions were from **subsidized units**
- 68% of tenants seeking post-default relief were **disabled**

Jan – Dec 2025 Findings - By Month



Jan – Dec 2025 Findings – Outcomes

Outcomes of those defaulted*

Without legal aid intervention

- 70% face direct homelessness
- 15% find temporary/informal housing
- 15% unknown

With legal aid representation (of those represented)

- 30% stayed in home/reinstated tenancies
- 45% negotiated/granted stay (10-30 days)
- 10% case dismissed
- 15% counsel/advice

Deep Dive in Subsidized Facility Evictions

Why?

How?

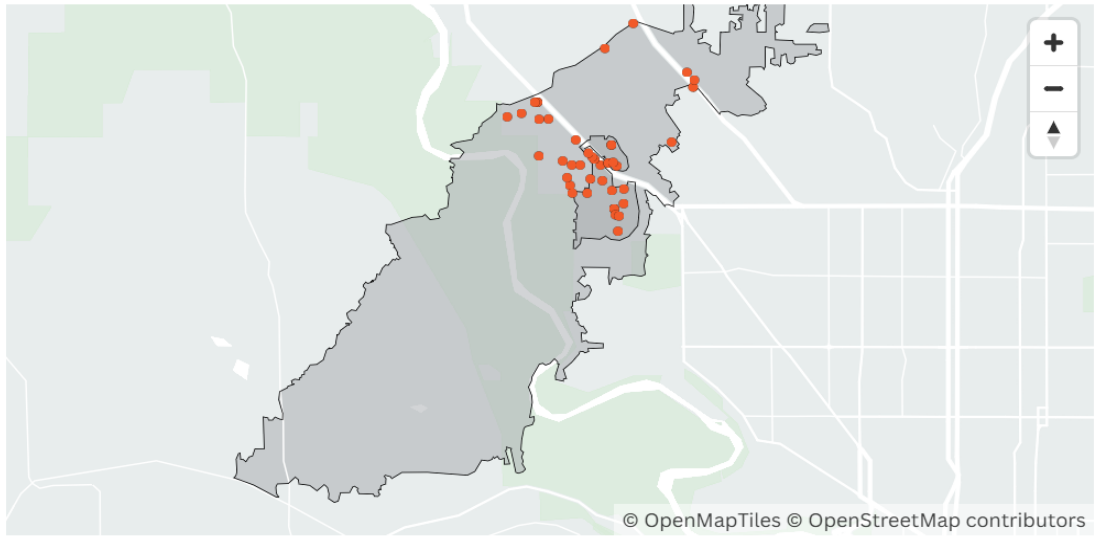
How can we meet our clients where they are at?

Spokane Complex Fire – Default Evictions

The loss of more than 800 homes in the blaze collided with Spokane's already-stressed housing market. The city administration says that at least 11 rental properties have been confirmed as damaged or destroyed, and estimates the full total of rental units impacted could be nearly 90. A RANGE analysis found 43 units listed on the city's long-term rental registry fell within the burn area.

The Spokane Complex fires burn area contained 43 rental units

Each orange circle represents a unit located in the area damaged by the Old Trails fire.



Source: Wildland Fire Interagency Geospatial Services, Spokane City Council Longterm Rental Registry • Graphic by Yong-Yu Huang
Note: Shows rental registry addresses within the mapped Old Trails, Autumn Lane, and Fairview fire perimeters (WFIGS). Intersection does not imply structural damage.

Range Media
The Other Way People Are Losing Their Homes in The Fires

Strategies for Reducing Default Judgments through Community Engagement & Local Advocacy

Local Advocacy Prevents Defaults



Skagit County Local Rule 8: Key Protections

Before Filing

Notify legal aid and provide tenant contact information

Court Notices

Provide legal aid, interpreter, and remote hearing information

Default Judgments

No default or writ of restitution before a hearing

Access to Counsel

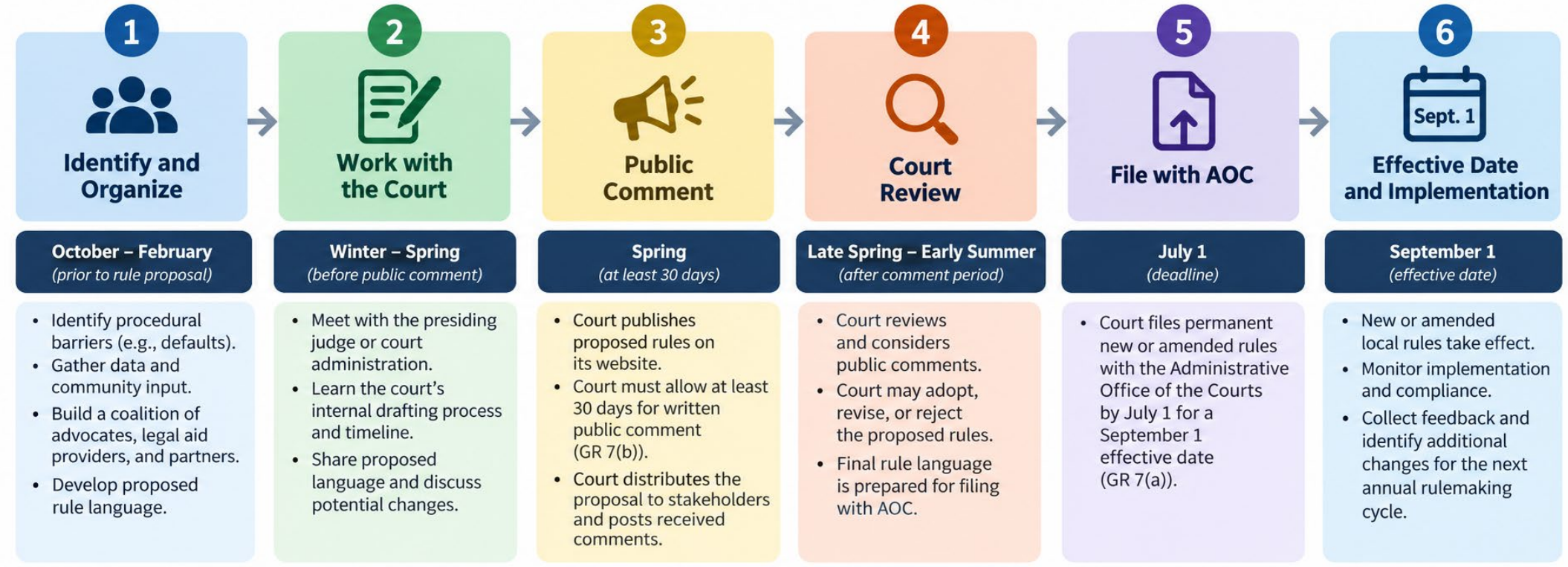
Legal aid announcements and continuances to consult counsel

Community Engagement Drives Better Court Rules

1. Find the existing rules and identify what needs to change.
2. Engage the Court before the formal comment period
3. Develop a concrete proposal informed by community input
4. Participate in the required comment process.
5. Track adoption, implementation, and future revisions

Washington Local Court Rulemaking Timeline

Key steps for adopting or amending local court rules (GR 7)



The policy takeaway

Preventing an eviction can be an opportunity to prevent entry into a potentially long period of homelessness. Once homelessness occurs, financial and legal barriers can make returning to stable housing substantially more difficult.

Legislation and helpful policies

Housing funding-

Fund affordable Housing.

Preservation of affordable housing

Funds to repair aging buildings

Tenant protections like right to counsel.

Just cause eviction.

Tenant funding:

Centralized Permanent Rental Assistance fund.

Housing WA. ANNUAL CONFERENCE

Thank you!

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