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**IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON
IN AND FOR THE COUNTY OF CLALLAM**

In re the Estates of:

WILLIAM DENEUX TALLMAN
and BONITA JEAN TALLMAN,

Deceased.

Case No.

**JOINT PETITION FOR PROBATE,
APPOINTMENT OF PERSONAL
REPRESENTATIVE, AND ORDER
GRANTING NONINTERVENTION
POWERS (RCW 11.20.020 and
RCW11.68.011)**

1. **Decedents.** WILLIAM DENEUX TALLMAN and BONITA JEAN TALLMAN husband and wife, (the decedents) both residents of Sequim, Clallam County, Washington, died on May 18, 2016, and June 9, 2009 respectively, leaving estates subject to the jurisdiction of this court.

2. **Will/Intestate.** William Deneux Tallman left a document purporting to be his Last Will and Testaments ("the decedent's Will") which was executed on June 15, 2009, in the presence of competent witnesses. Mr. Tallman was legally competent to execute his Will. The decedent's will nominates and appoints his step-son **JOHN CLAYBORN THREADGILL** to serve as Personal Representative without bond. The original of the decedent's will is believed to be in a safety deposit box with Chase Bank, Sequim, Washington. A copy of his signed will is currently filed with an original attestation affidavit from the witnesses who watched Mr.

1 Threadgill sign his will. There is no indication that Mr. Tallman intended to revoke
2 his Will.

3 Bonita Jean Tallman died intestate. Petitioner is Mrs. Tallman's biological son.

4 3. **Petitioner.** Petitioner, John Clayborn Threadgill, is a resident of Great
5 Mills, Maryland, is the step-son of William Deneaux Tallman and the biological son
6 of Bonita Jean Tallman. He was not a creditor of either decedent at the time of their
7 deaths. He is named in William Deneaux Tallman's will as the Personal
8 Representative for that estate and he qualifies to administer his mother's estate
9 pursuant to RCW 11.28.120(2). He is qualified to act as personal representative for
10 both estates.
11

12 4. **Heirs and Distributees.** The beneficiaries of the decedent and the
13 distributees under the decedent's will whose names and addresses are known to
14 petitioner are as follows:
15

16 Estate of William Deneaux Tallman:

17 4.1 Heather Lynn Marlow
18 111 NW Cherry St.
19 White Salmon, WA 98672

20 Estate of Bonita Jean Tallman:

21 4.2 John Clayborn Threadgill, son
22 45770 Military Ln.
23 Great Mills, MD

24 4.3 Shawn Addison Threadgill, son
25 Address unknown

26 5. **Solvency of estate.** The decedents' estate is solvent, taking into
account probate and non-probate assets. Petitioner represents that decedents' estate

1 consists of real property, financial accounts, and other assets, all of which assets are
2 believed to exceed \$100,000.00 in value. The debts of the decedents' are unknown
3 but it is believed the assets substantially exceed the liabilities.

4 **6. Nonintervention powers.** Administration and settlement of both
5 decedents' estates with nonintervention powers would be in the best interests of the
6 decedent's beneficiaries and creditors.

7 **7. Administration as Single Estate.** Petitioner requests authority to
8 administer both estates as a single probate action in the interest of efficiency and
9 cost-effectiveness, and in view of the presumption that the assets of both estates are
10 community property.

11 **8. Notice of hearing on petition.** Advance notice of the hearing on this
12 petition is not required based upon petitioner being named as Personal
13 Representative in William Tallman's Will, RCW 11.68.041(1), and because there is no
14 surviving spouse. RCW 11.28.131.

15 WHEREFORE, petitioner prays for an order of this court as follows:

16 1. That the Will of William Deneaux Tallman be established as his Last Will
17 and Testament and admitted to probate;

18 2. That petitioner be appointed as Personal Representative of the
19 decedents' joint estates, to act without bond;

20 3. That petitioner be granted nonintervention powers entitling petitioner
21 to administer and close the decedents' joint estates without further court intervention
22 or supervision;

1 4. For such other and further relief as the court may deem just and
2 equitable.

3 DATED this _____ day of May, 2016.

4 BELL & DAVIS PLLC

5
6
7 By: _____
8 W. JEFF DAVIS, WSBA#12246
9 Attorney for Petitioner

10 **CERTIFICATE**

11 1. I am the petitioner in the above-entitled action. I have read the
12 foregoing JOINT PETITION FOR PROBATE, APPOINTMENT OF PERSONAL
13 REPRESENTATIVE, AND ORDER GRANTING NONINTERVENTION POWERS,
14 know the contents thereof, and believe the same to be true.

15
16 2. I certify under penalty of perjury under the laws of the state of
17 Washington that the foregoing is true and correct.

18 DATED at Sequim, Washington this _____ day of _____, 2016.

19
20
21 _____
22 JOHN CLAYBORN THREADGILL