

FILED
SUPREME COURT
STATE OF WASHINGTON
2/18/2025 11:18 AM
BY SARAH R. PENDLETON
CLERK

NO. 1032528

SUPREME COURT OF THE STATE OF WASHINGTON

IN RE DETENTION OF M.E.,

Petitioner.

ANSWER TO MOTION FOR DISCRETIONARY REVIEW
AND GROUNDS FOR DIRECT REVIEW

LEESA MANION (she/her)
King County Prosecuting Attorney

Anne E. Mizuta
Andrea R. Vitalich
Senior Deputy Prosecuting Attorneys
Attorneys for Respondent

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TABLE OF CONTENTS

	Page
A. <u>IDENTITY OF ANSWERING PARTY</u>	1
B. <u>TRIAL COURT DECISION DPD ASKS THIS COURT TO REVIEW</u>	1
C. <u>STATEMENT OF THE CASE</u>	2
D. <u>ARGUMENT WHY REVIEW SHOULD BE DENIED</u>	2
E. <u>CONCLUSION</u>	10

TABLE OF AUTHORITIES

Page

Table of Cases

Federal Cases:

Addington v. Texas,

441 U.S. 418, 425, 99 S. Ct. 1804,
60 L. Ed. 2d 323 (1979).....8

United States v. Budell,

187 F.3d 1137, 1141-43 (9th Cir. 1999).....8

Washington State:

City of Burlington v. Washington State Liquor Control Bd.,

187 Wn. App. 853, 351 P.3d 875, review denied sub
nom City of Burlington v. Singh, 184 Wn.2d 1014
(2015).....4

Diversified Indus. Dev. Corp. v. Ripley et al.,

82 Wn.2d 811, 514 P.2d 137 (1973).....7

Eyman v. Ferguson,

7 Wn. App. 2d 312, 433 P.3d 863 (2019).....2

In re Det. of L.H.,

18 Wn. App. 2d 516, 492 P.3d 192, review denied,
198 Wn.2d 1031 (2021).....8

<u>In re Det. of T.A.H.,</u> 123 Wn. App. 172, 97 P.3d 767 (2004).....	9
<u>John Doe v. Puget Sound Blood Ctr.,</u> 117 Wn.2d 772, 819 P.2d 370 (1991).....	8
<u>State v. Beaver,</u> 184 Wn.2d 321, 358 P.3d 385 (2015).....	2
<u>Stevens County v. Stevens County Sheriff's Dept.,</u> 20 Wn. App. 2d 34, 499 P.3d 917 (2021), <u>review</u> <u>denied</u> , 100 Wn.2d 1008 (2022)	6
<u>To-Ro Trade Shows v. Collins,</u> 144 Wn.2d 403, 27 P.3d 1149 (2001).....	7
<u>Washington Fed'n of State Employees v. State,</u> 2 Wn.3d 1, 534 P.3d 320 (2023).....	3

Rules and Regulations

Washington State:

RAP 10.10(f).....	2
RAP 13.4(7).....	2

A IDENTITY OF ANSWERING PARTY

The King County Prosecuting Attorney's Office (KCPAO), which represents the petitioning health care facility below, files the following answer to the motion for discretionary review and grounds for direct review filed by the King County Department of Public Defense (DPD).

B. TRIAL COURT DECISION DPD ASKS THIS COURT TO REVIEW

The trial court decision at issue is the Amended Order Requiring DPD to Appoint Counsel, Dated July 9, 2024, in In re Detention of M.E., King County cause no. 24-6-2709-7. See Petitioner's Appendix ("Pet. App."), at 5-10. The order directs DPD to appoint counsel for M.E. to represent him in this Involuntary Treatment Act (ITA) case.

C. STATEMENT OF THE CASE

The relevant facts for the KCPAO's answer to DPD's motion for discretionary review and grounds for direct review are set forth in the Declaration of Anne Mizuta ("Mizuta dec."). See Appendix ("App.") at 1-5.

D. ARGUMENT WHY REVIEW SHOULD BE DENIED

This Court should deny discretionary and direct review for multiple reasons.

First, this case is moot because M.E.'s ITA case was dismissed on July 16, 2024. See App. at 6-9.

A case is moot if the court can no longer provide effective relief. State v. Beaver, 184 Wn.2d 321, 330, 358 P.3d 385 (2015). Courts do not generally consider moot cases that "present only abstract questions." Id. Put another way, a case is moot when "substantial questions in the trial court no longer exist[.]" Eyman v. Ferguson, 7 Wn. App. 2d 312, 320, 433 P.3d 863 (2019).

As stated above, this case is moot because it was dismissed on July 16th; indeed, it was dismissed before DPD filed its motion for discretionary review on July 25th. Moreover, although the trial court's order that DPD asks this Court to review concerns a purported shortage of attorneys to take ITA cases, M.E. was represented by counsel as reflected in the dismissal order. App. at 7. Review should be denied on this basis alone.

Second, DPD lacks standing because DPD is not a party in an ITA case.

"Standing" means a party's right to bring a legal claim. Washington Fed'n of State Employees v. State, 2 Wn.3d 1, 14, 534 P.3d 320 (2023). While standing "is not intended to be a high bar," it prevents a party "from raising another person's legal right." Id. at 15. Standing in Washington requires an "injury in fact," meaning a specific and perceptible harm rather than a conjectural or hypothetical one. City of Burlington v. Washington State

Liquor Control Bd., 187 Wn. App. 853, 869-70, 351 P.3d 875, review denied sub nom City of Burlington v. Singh, 184 Wn.2d 1014 (2015). Where a party alleges a threatened injury rather than a presently existing one, the threatened injury must be “immediate, concrete, and specific.” Id. at 869. Standing is reviewed *de novo* on appeal. Id. at 861.

The parties to an ITA case in King County are the petitioning health care facility or individual (represented by the KCPAO), and the patient the health care facility or individual seeks to have involuntarily committed. See Mizuta Dec., ¶ 3. In this case, which has been dismissed, no claims have been raised on behalf of M.E. himself; specifically, no one claims that M.E. was denied the right to counsel, that he received ineffective assistance of counsel, or that he was deprived of due process.

The “injury” alleged—the potential for exceeding advisory caseload standards—is speculative, not

concrete, and it is a generalized grievance rather than a particular and individualized harm. Moreover, the party or parties who might actually have standing in a case like this—*i.e.*, ITA patients who are wrongfully denied counsel and thus deprived of due process—do not (yet) exist. DPD also raised the issue of its labor contracts with its attorneys as a reason the trial court could not assign counsel to ITA patients; however, those attorneys may address such claims, via their union representatives in an interactive process. Standing is lacking on these grounds as well.

But perhaps most importantly, DPD's assertions create a legal canard: the harm alleged is the potential exceeding of advisory caseload standards, but the remedy requested would create an even greater harm, *i.e.*, ITA respondents detained in hospitals without representation. In other words, DPD asks this Court to accept direct and discretionary review to consider

whether persons *with* standing—*i.e.*, ITA patients—should be denied the right to counsel, thus creating obvious appellate issues in those cases.

Third, this case does not present a justiciable controversy.

It is well-settled in Washington that there are four requirements for a justiciable controversy: (1) an actual and existing dispute, not a possible or speculative disagreement; (2) parties with genuine and opposing interests; (3) parties with substantial and direct interests, not potential, theoretical, or abstract ones; and (4) an actual dispute where a judicial determination will be final and conclusive. Stevens County v. Stevens County Sheriff's Dept., 20 Wn. App. 2d 34, 41, 499 P.3d 917 (2021), review denied, 100 Wn.2d 1008 (2022). “Where the four justiciability factors are not met, ‘the court steps into the prohibited area of advisory opinions.’” To-Ro Trade Shows v. Collins, 144 Wn.2d 403, 416, 27 P.3d

1149 (2001) (quoting Diversified Indus. Dev. Corp. v. Ripley et al., 82 Wn.2d 811, 815, 514 P.2d 137 (1973)).

Advisory opinions are “*rare*” and occur only where the public interest in resolution of an issue is “*overwhelming*.”

To-Ro Trade Shows, 144 Wn.2d at 416 (emphasis added).

In this matter, DPD is asking for an advisory opinion on whether the trial court may order it to exceed advisory caseload standards at some point in the future in ITA cases other than this one. This is plainly not a justiciable controversy. Moreover, given the procedural infirmities discussed above, this matter does not meet the stringent criteria for issuance of an advisory opinion.

Fourth, this issue does not merit review by this Court.

It should go without saying that the judicial branch has a duty to ensure due process for all litigants in any type of case. See John Doe v. Puget Sound Blood Ctr.,

117 Wn.2d 772, 780, 819 P.2d 370 (1991). Yet DPD asks this Court to divest the trial court of its ability to fulfill that duty based on advisory case load standards.

In its trial court pleadings in this matter, DPD consistently referred to the right to counsel in ITA cases as merely “statutory.” Although the right to counsel under the Fifth and Sixth Amendments do not apply in civil commitment cases, the right to counsel is a due process protection in civil commitment cases, not a purely statutory one. See United States v. Budell, 187 F.3d 1137, 1141-43 (9th Cir. 1999); see *also* In re Det. of L.H., 18 Wn. App. 2d 516, 524, 492 P.3d 192, review denied, 198 Wn.2d 1031 (2021). It is well-settled that involuntary civil commitment is a significant deprivation of liberty. Addington v. Texas, 441 U.S. 418, 425, 99 S. Ct. 1804, 60 L. Ed. 2d 323 (1979). As such, due process requires effective assistance of counsel in civil commitment

proceedings. In re Det. of T.A.H., 123 Wn. App. 172, 178-79, 97 P.3d 767 (2004).

Here, there is no allegation that M.E.—or any other ITA patient—has received ineffective assistance of counsel. Indeed, the evidence is to the contrary. See Mizuta Dec., ¶¶ 10-14. Moreover, the notion that advisory caseload standards preclude the judicial branch from fulfilling its duty to ensure due process and legal representation for involuntarily detained ITA patients is absurd. The advisory caseload standards simply cannot be elevated above due process. Particularly in light of the procedural infirmities discussed above, this case does not merit review by this Court.

Lastly, because of the procedural infirmities and lack of merit in this case, this Court should deny discretionary review outright rather than ruling only on the grounds for direct review and remanding consideration of DPD's motion to the Court of Appeals.

E. CONCLUSION

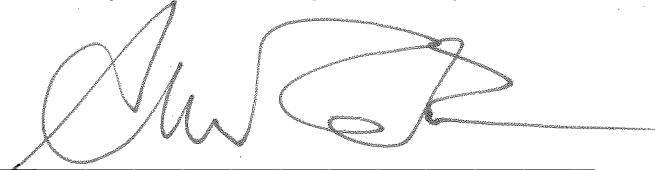
The KCPAO respectfully requests that the Motion for Discretionary Review and Grounds for Direct Review be denied.

I certify in accordance with the Rules of Appellate Procedure that this document contains 1343 words.

DATED this 11th day of September, 2024.

Respectfully submitted,

LEESA MANION (she/her)
King County Prosecuting Attorney

By: 

ANNE E. MIZUTA, WSBA #31589

ANDREA R. VITALICH, WSBA #25535

Senior Deputy Prosecuting Attorneys

APPENDIX TABLE OF CONTENTS

Declaration of Anne Mizuta.....	1-5
Order for Voluntary Dismissal (redacted).....	6-10

SUPERIOR COURT OF WASHINGTON FOR KING COUNTY

IN RE THE DETENTION OF

AA; NA; FA; BB; DB; AC; AD; SH; MH; AH; SJ;
JK; DK; NL; CL; CL; JM; EM; CM; JM; LM;
CM; WN; LO; SP; JP; KR; RS-C; DS; SS; MS;
KT; CU-F; LV; HW; JW; LX; KA; SG; AG; SJ;
RL; TS,

Respondents.

Nos.

24-6-02228-1; 24-6-02221-4;
24-6-02202-8; 24-6-02016-5;
24-6-02231-1; 24-6-02226-5;
24-6-02225-7; 24-6-02222-2;
24-6-02205-2; 24-6-02213-3;
24-6-02230-3; 24-6-02208-7;
24-6-02196-0; 24-6-02233-8;
24-6-01887-0; 24-6-02209-5;
24-6-02199-4; 24-6-00443-7;
24-6-02086-6; 24-6-02224-9;
24-6-02197-8; 24-6-02211-7;
24-6-02210-9; 24-6-02204-4;
24-6-02223-1; 24-6-02216-8;
23-6-05895-4; 24-6-02203-6;
24-6-02219-2; 24-6-02206-1;
24-6-02229-0; 24-6-02243-5;
24-6-02234-6; 24-6-02195-1;
24-6-02218-4; 24-6-02207-9;
24-6-01965-5; 24-6-02246-0;
24-6-02247-8; 24-6-02254-1;
24-6-02256-7; 24-6-02062-9;
24-6-02249-4

DECLARATION OF ANNE MIZUTA

1 I, Anne Mizuta, hereby declare as follows:

- 2 1. I am over the age of 18. I have personal knowledge of the matters addressed in
3 this declaration and am competent to testify.
- 4 2. I am a King County Senior Deputy Prosecuting Attorney and have been the Chair
5 of the Involuntary Treatment Act (ITA) Unit in the King County Prosecutor's
6 Office (PAO) since 2011.
- 7 3. By statute, the PAO represents the individuals and agencies that petition for adult
8 and juvenile commitment in King County. See RCW 71.05.130 and RCW
9 71.34.740.
- 10 4. Currently, the PAO has 8 full time trial deputies in the ITA Unit whom I
11 supervise.
- 12 5. The PAO does not make the filing decisions for ITA cases and has no control of
13 the size of the daily ITA Superior Court docket.
- 14 6. The PAO attempts to assign new ITA cases evenly to each trial DPA each judicial
15 day. For efficiency and continuity, trial DPAs who previously handled an ITA
16 case with a respondent are assigned to additional petitions and cause numbers for
17 that respondent. The total number of cases assigned to each DPA can fluctuate
18 depending on the number of cases that previously have been continued.
- 19 7. The PAO trial deputies are responsible for advising the King County Designated
20 Crisis Responders, King County Evaluation and Treatment Facilities, the King
21 County Secure Withdrawal Management and Stabilization Facility, and all King
22 County Single Bed Certification hospitals and emergency departments.
- 23 8. Individual trial DPAs are responsible for interviewing and securing witnesses for
24 each of their cases, working with the expert witnesses regarding testimony and
case strategy, negotiating with defense counsel, responding to any motion to
dismiss (which is typically required within 2 hours of service of motion per Local
Mental Proceeding Rule 1.9), litigating the full evidentiary hearings, submitting
orders for all of their assigned cases, and responding to any revision or appeal
filed on the ITA case.
9. In addition to the daily docket of ITA hearings, the PAO currently is handling 26
active appeals that were filed by the Department of Public Defense (DPD).
10. DPD assigned counsel only represent the respondents in ITA proceedings.

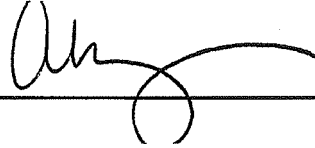
11. To date, according to the ITA group email lists: itateam@kingcounty.gov and acaia2@kingcounty.gov, DPD has 18 total attorneys assigned full time to ITA. Of those 18 attorneys, two are supervisors.
12. Conflict counsel and privately retained counsel also represent ITA respondents.
13. DPD attorneys do not handle their own appeals.
14. I have been involved in all the King County ITA appeals litigated since 2007 and am not aware of any case dismissal due to ineffective assistance of counsel.
15. In my extensive experience with ITA proceedings in King County, DPD attorneys provide competent and zealous representation for their ITA clients, regardless of the size of their caseloads at any given time.
16. King County Superior Court operates at least two full time court rooms designated for ITA cases each judicial day.
17. ITA cases follow very strict timelines established in RCW 71.05 and RCW 71.34. When a patient is detained by a designated crisis responder for 120 hours, the respondent has a right to a full evidentiary hearing within 120 hours if a petition for an additional 14 Day Commitment is filed. Similarly, when a petition for revocation of a less restrictive order is served, a respondent has a right to a full evidentiary hearing within 5 judicial days.
18. The volume of ITA cases on any given day is based on the number of patients in need of involuntary behavioral health treatment and the statutory timelines regarding the detentions.
19. Per the ITA Operational Protocols – Approved and Effective 12/18/23, ITA Court holds a trial call (a/k/a “readiness hearing”) at 8:45 a.m. and 1:15 daily. During trial call, the PAO confirms readiness and the anticipated witnesses for each matter. DPD attorneys confirm readiness and often will note if they have not had contact with anticipated witnesses. Despite not having contact, it is routine for DPD attorneys to note they only need a couple of minutes to talk to a witness and will be ready. It is not common practice for DPD attorneys to request a delay of the hearing for lengthy witness interviews. The fact that DPD attorneys only need a couple of minutes to talk to a witness does not mean they are ineffective as these attorneys still provide zealous representation and thorough cross-examination during hearings.
20. Most ITA cases resolve without hearing. I am included on email correspondence between the assigned the PAO trial deputy and respondent’s counsel on every ITA case. Each case is thoroughly negotiated between parties. Resolutions typically include agreed continuance orders and less restrictive treatment orders.

- 1 21. At any time during the commitment process, the petitioning facility must release
2 the respondent if the treatment providers determine the respondent no longer
3 meets ITA criteria. See RCW 71.05.260 and RCW 71.34.770. This frequently
4 resolves ITA matters in King County.
- 5 22. Per review of the King County May 2024 ITA Data, there were 1,321 matters on
6 the ITA docket for the entirety of May 2024. Of those matters, respondent set
7 only 393 cases for hearing. Of the 393 requested hearings, only 100 cases went to
8 hearing.
- 9 23. In my experience, typical ITA hearings last between 2-4 hours.
- 10 24. DPD ITA attorneys routinely file motions to dismiss ITA petitions when there is
11 an alleged violation of statutory timelines regarding the detention process or
12 hearing schedule or a violation of the respondent's rights. DPD ITA attorneys
13 vehemently argue that the ITA statutes should be strictly construed, including the
14 right to counsel, and that the respondents' due process rights cannot be violated.
- 15 25. DPD Deputy Director Gordon Hill and DPD Direct Anita Khandelwal emailed
16 ITA King County Superior Court parties, including me, numerous times in April
17 2024 that DPD was "nearing capacity" in their ability to assign counsel to ITA
18 matters until May 1, 2024.
- 19 26. Despite my email request on April 30, 2024, to DPD for explanation about ITA
20 cases on the May 1, 2024, docket, DPD failed to respond and on May 1, 2024,
21 DPD failed to assign counsel to 12 of the 58 cases on the ITA calendar.
- 22 27. Mr. Hill appeared on the ITA record and expressed surprise that King County
23 Superior Court had not yet provided orders for DPD to assign counsel. He
24 expressed that DPD anticipated this is what the court's remedy would be for this
situation and said DPD would assign counsel pursuant to such orders.
- 25 28. Mr. Hill also appeared on behalf of DPD on May 1, 2024, when In re the
26 Detention of M.W. 24-6-01774-1 was called on the record. DPD failed to assign
27 counsel, even though it was May 1, 2024. DPD had not provided notice that they
28 were unable to assign counsel in May. Commissioner Holman signed an order
29 directing DPD to assign counsel.
- 30 29. Mr. Hill sent repeated emails to ITA King County Superior Court parties,
31 including me, numerous times at the end of May 2024. He indicated that DPD
32 was "at capacity" in their ability to assign counsel to ITA matters and would
begin assigning new cases only again on Monday 6/3.

Under penalty of perjury under the laws of the State of Washington, I certify that the foregoing is true and correct to the best of my knowledge and belief.

1 Signed and dated by me this 21st day of June 2024, in Seattle, Washington.

2 By:

3 
4

5 Anne E. Mizuta, WSBA #31589
6 Senior Deputy Prosecuting Attorney
7 Unit Chair Involuntary Treatment Unit
8 King County Prosecuting Attorney's Office

9
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12 Seattle, WA 98104
13 Telephone: (206)296-9000
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IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON COUNTY OF KING

Case No. 24-6-02709-7 SEA

M [REDACTED] E [REDACTED]
Respondent

ORDER FOR

- ☐ DISMISSAL WITHOUT PREJUDICE
(ORDSMWO)
- ☐ DISMISSAL WITH PREJUDICE
(ORDSMWP)
- ☒ VOLUNTARY DISMISSAL
(ORDSMS)
- ☐ DISMISSAL OF PETITION FOR
_____ (OR)

Clerk's Action Required

THIS MATTER came before the Court on the petition for:

- ☒ 14 days
- ☐ 90 days
- ☐ 180 days of involuntary treatment
- ☐ Revocation of a less restrictive order / conditional release

filed in this proceeding.

- ☒ Petitioner has moved for the entry of a voluntary dismissal pursuant to CR 41(a)(1)(B).
- ☐ Respondent has moved for dismissal on the following basis: _____

The following people were present at the hearing:

- ☐ Respondent present
- ☐ Respondent present via video link
- ☐ Respondent not present
- ☒ Respondent waived presence
- ☐ Separate presence waiver has been filed.
- ☒ Respondent has orally waived his/her presence to defense counsel, and the Court accepts this waiver.
- ☐ G.A.L. present - _____
- ☐ G.A.L. waived presence - _____

- ☐ G.A.L. waived Respondent's presence - _____
- ☐ Interpreter present
- ☒ Deputy Prosecuting Attorney Levi Williams present
- ☒ Respondent's Attorney Henry Pollitt for A [REDACTED] M [REDACTED] present

II. FINDINGS

The Court makes the following findings:

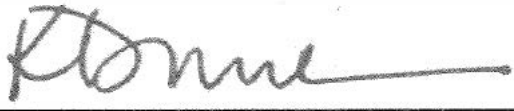
- ☒ Voluntary Dismissal. Petitioner's motion to dismiss was made before the Petitioner rested, the Respondent has not interposed a counterclaim; and the Petitioner has not previously dismissed an action based on or including the claim which is the subject of the present action.
- ☐ Involuntary Dismissal. Petitioner's petition for _____ is dismissed
- ☐ with prejudice because _____.
- ☐ without prejudice because _____.
- ☐ Other Finding: _____

III. ORDER

Based on the foregoing findings, IT IS HEREBY ORDERED that Petitioner's petition for _____ is:

- ☒ Dismissed without prejudice.
- ☐ Dismissed with prejudice.
- ☐ The Respondent is released back onto his/her Less Restrictive Order.
- ☐ Other Order: _____

Done in Open Court: July 16, 2024



Karen Donohue
Judge / Commissioner

X _____

Deputy Prosecuting Attorney, Bar # _____

- ☒ This order is digitally signed.
Levi Williams
Bar# 58586

X _____

Attorney for Respondent, Bar # _____

- ☐ This order is digitally signed.
Signature Waived
Bar # _____

X _____

Respondent

Interpreter certifies that they have reviewed this order with Respondent.

X

Interpreter

King County Superior Court
Judicial Electronic Signature Page

Case Number: 24-6-02709-7
Case Title: M [REDACTED] E [REDACTED]
Document Title: MI - Order for Dismissal (24-6-02709-7)
Signed By: Karen Donohue
Date: July 16, 2024



Judge: Karen Donohue

This document is signed in accordance with the provisions in GR 30.

Certificate Hash: 9B255DE83C7DBACA18D2FBDFEB8024E9E87AA11D
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O=KCDJA, CN="Karen Donohue: gqcCpMmN7BGVIJgr
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**KING COUNTY PROSECUTING ATTORNEYS OFFICE,
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Answer to Motion for Discretionary Review and Grounds for Direct Review

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Comments:

REDACTED Answer to Motion for Discretionary Review and Grounds for Direct Review.

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