

FILED
SUPREME COURT
STATE OF WASHINGTON
2/9/2023 11:39 AM
BY ERIN L. LENNON
CLERK

Supreme Court No. 100,992-5

Court of Appeals No. 55,915-3-II

SUPREME COURT OF THE STATE OF WASHINGTON

Gene Gonzales and Susan Gonzales, Horwath Family
Two, LLC, and the Washington Landlord Association,

Appellants

v.

Governor Jay Inslee and State of Washington,

Respondents.

Errata

STEPHENS & KLINGE LLP
Richard M. Stephens, WSBA # 21776
10900 NE 4th Street, Suite 2300
Bellevue, WA 98004
(425) 453-6206
stephens@sklegal.pro
Attorneys for Appellants

With appreciation to counsel for the City of Seattle for notifying counsel about this discrepancy, Appellants submit this Errata. Part of footnote 9 on page 29 of Appellants' Answer to Amici states:

“The constitutional requirement of just compensation derives as much content from the basic equitable principles of fairness.” *United States v. Commodities Trading Corp.*, 339 U.S. 121, 124 (1950).

That language should be replaced with:

“The constitutional requirement of just compensation derives as much content from the basic equitable principles of fairness.” *Almota Farmers Elevator & Warehouse Co. v. United States*, 409 U.S. 470, 478 (1973) (citing *United States v. Commodities Trading Corp.*, 339 U.S. 121, 124 (1950)).

The undersigned certifies that this Errata contains 108 words and that this change adds 16 words to Appellants' Answer to Amici, keeping that Answer compliant with the applicable word limits.

Respectfully submitted this 9th day of February 2023,
by

STEPHENS & KLINGE LLP

/s/ Richard M. Stephens

Richard M. Stephens, WSBA 21776

Attorneys for Petitioners and
Appellants Below

Declaration of Service

I, Richard M. Stephens, declare as follows pursuant to GR 13 and RCW 9A.72.085 that counsel for Respondents was served through the Court's electronic filing portal on February 9, 2023.

Executed this 9th day of February 2023, at Woodinville, Washington.

/s/ Richard M. Stephens
Richard M. Stephens

STEPHENS & KLINGE LLP

February 09, 2023 - 11:39 AM

Transmittal Information

Filed with Court: Supreme Court
Appellate Court Case Number: 100,992-5
Appellate Court Case Title: Gene and Susan Gonzales, et al. v. Jay Inslee and State of WA
Superior Court Case Number: 20-2-02525-6

The following documents have been uploaded:

- 1009925_Other_20230209113817SC803888_2352.pdf
This File Contains:
Other - Errata
The Original File Name was Errata.pdf

A copy of the uploaded files will be sent to:

- Jennifer.Wood@atg.wa.gov
- SGOOlyEF@atg.wa.gov
- SSpiegelman@pacificlegal.org
- brian.rowe@atg.wa.gov
- bth@pacificlegal.org
- christopher@cuttinglaw.com
- comcec@atg.wa.gov
- cristina.sepe@atg.wa.gov
- dawn.taylor@pacificlawgroup.com
- dpatterson@corrchronin.com
- edmundw@kcba.org
- eric.nygren@seattle.gov
- jacksonm@biaw.com
- jeff.weber@seattle.gov
- jeffrey.even@atg.wa.gov
- jwmaynard2003@yahoo.com
- paul.lawrence@pacificlawgroup.com
- rfried@democracyforward.org
- roger.wynne@seattle.gov
- sam.spiegelman1@gmail.com
- victoria.ainsworth@jacksonlewis.com
- yuant@kcba.org

Comments:

Sender Name: Richard Stephens - Email: stephens@sklegal.pro
Address:
10900 NE 4TH ST STE 2300
BELLEVUE, WA, 98004-5882
Phone: 425-453-6206

Note: The Filing Id is 20230209113817SC803888

