No. 1012861

IN THE SUPREME COURT OF THE

STATE OF WASHINGTON

AMELIA BESOLA,

Appellant,

v.

BRANDON GUNWALL,

Respondent.

BRANDON GUNWALL'S ANSWER TO AMELIA BESOLA'S PETITION FOR REVIEW

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I. INTRODUCTION

The Respondent, Brandon Gunwall ("Gunwall") opposes the Petitioner's, Amelia Besola ("Amy")[1] Petition for Review. Amy seeks review of an unpublished 25-page opinion by the Court of Appeals affirming the trial court's decision in favor of Gunwall, of a highly unusual TEDRA matter with facts that are very unique to the parties involved. The Court of Appeals also DENIED Amy's subsequent motion for reconsideration and her request to publish its decision, specifically rejecting one of the arguments she now makes to this Court – that this private matter is somehow a matter of substantial public interest. A brief procedural history of this matter is necessary given the irregularities that are also unique to this case. In recognition that this is unique, and in an effort not to

[1] Amy and the Decedent have the same last name, so to prevent confusion throughout the duration of this matter, the Petitioner has been referred to by "Amy" or "Amelia" while the Decedent has been referred to as "Mark." No disrespect is intended.

inundate this Court with a request for permission to file a large appendix of documents, the following information is provided simply to help the Court understand the background of this matter in light of Amy's improper co-mingling of numerous matters into this appeal.

A. Two Lawsuits.

Amy commenced two TEDRA actions against Gunwall (among others).

1. TEDRA Action No. 1. The first TEDRA petition Amy filed, which is the subject of this appeal, alleged that Gunwall, the named beneficiary of some of the Decedent's, Mark Besola's ("Mark")[2], non-probate financial accounts with Fidelity ("Fidelity Accounts"), only became a beneficiary because either (1) Gunwall unduly influenced Mark to change the beneficiary

[2] As set forth above, Amy and Mark have the same last name, so they are identified herein by their respective first names. No disrespect is intended.

designations, or (2) Mark was a vulnerable adult whom Gunwall financially exploited (prior to Mark's death) which should therefore render him unable to inherit from Mark despite being the designated beneficiary of the Fidelity Accounts. Those were the only two claims raised in Amy's TEDRA petition for the matter which is the subject of this appeal. For the first time, in response to Gunwall's motion to dismiss Amy's claims on summary judgment at the trial court level, she asserted that Gunwall must have made the beneficiary designation changes himself which was, of course, contradictory to her claim of undue influence which would have required Mark to make the changes. Amy argued this theory again on appeal. There was, and remains to this day, no evidence to support Amy's ever-changing theories of the case against Gunwall, whether undue influence, financial exploitation, or fraud in changing Mark's beneficiary designation on the Fidelity Accounts, and the trial court

granted Gunwall's motion for summary judgment on November 6, 2020.

2. TEDRA Action No. 2. Amy also filed a second TEDRA Petition – a Will Contest – including claims and allegations that (1) Mark lacked testamentary capacity; (2) Mark's will was the product of undue influence; (3) Mark's will was the product of insane delusion(s); (4) Mark's will was the product of fraudulent inducement; (5) Mark's will was not technically signed correctly; and (6) the beneficiaries of Mark's will should be disinherited for financial exploitation of a vulnerable adult. Amy named Gunwall as a respondent in this second action, along with five other parties. Gunwall brought a motion for summary judgment to dismiss any and all claims against him in the Will Contest as well, again based upon Amy's failure to produce any evidence to support the allegations she levied against him. The trial court granted Gunwall's motion for

summary judgment on December 11, 2020, dismissing any and all claims made against him in the Will Contest.

3. Consolidation and CR 54(b). The two TEDRA actions initiated by Amy were consolidated at Gunwall's request for the sake of judicial economy and efficiency. Amy and her numerous attorneys from multiple law firms were engaged in what was later discovered to be a deliberately concocted scorched-earth litigation scheme designed to bury Gunwall's counsel in busy work such that they could not work for their other clients. With respect to the first TEDRA action against Gunwall, the Court also ordered entry of final judgment under CR 54(b). Gunwall was also awarded costs and fees against Amy in the amount of $154,986.34 (at 12% per annum), under RCW 11.96A.150.

4. Appeal of Summary Judgment in TEDRA Action No. 1.

The Court of Appeals, properly limiting their review to the evidence and information before the trial court at the time of summary judgment, affirmed the trial court's decision, despite Amy's repeated violations of court rules, decisions, and orders directing her to cease her improper filings. Amy's subsequent motion for reconsideration and request that the Court of Appeals publish its decision were both denied. Amy then filed her petition for review to this Court.

5. TEDRA Action No. 2 - After Dismissal of Claims Against Gunwall.

Amy proceeded with her claims against the other respondents in the Will Contest after the trial court dismissed all claims against Gunwall on summary judgment. The then-administrator of the estate, as well as another individual respondent, also brought motions for summary judgment seeking to have Amy's claims dismissed for lack of evidence. As Amy had no evidence

to support her claims against the other individual respondent, the trial court granted that motion, dismissing any and all claims against them and also awarding them costs and fees against Amy. The trial court granted the administrator's motion for summary judgment on all claims except two – namely, the claim that Mark's will was not technically signed correctly, and a contradictory new claim, again raised in response to the motion for summary judgment, that the will itself was actually a product of fraud – a forgery, having not been signed by Mark at all.[3]

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[3]All of Amy's claims in the Will Contest revolved around theories that Mark did in fact sign his will but did so for some improper reason. In defense to the administrator's motion for summary judgment, Amy raised a new claim that the signature on the will was actually a forgery. Noting that this claim was wholly inconsistent with her prior claims, the trial court allowed her to proceed with this new claim, but dismissed all others that would have included Mark actually signing his will.

The Will Contest proceeded to trial on this new theory, without Gunwall's involvement as a party (although he was called as a witness by Amy), and the administrator successfully defended the Will after a 4-day trial, in February of 2021. The trial court considered the testimony of many fact witnesses (including Gunwall), as well as dualling expert witnesses regarding the signature on the will document that had been filed with the court. After the trial ended but before the corresponding findings of fact and conclusions of law were signed, Amy obtained private documents from a non-party tech company that are protected by federal privacy statutes, without the consent of the party holding said rights. The result was, apparently, evidence sufficient to support the trial court's granting of Amy's motion to reopen the trial on the Will Contest.[4]

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[4] Gunwall is not privy to the evidence produced, as the trial court ordered that information sealed. This is, as

The re-opened trial on the Will Contest resulted in the trial court deciding, in November of 2021, that the will that had been admitted to probate was actually created after Mark's death and could therefore not be valid. At no time after Amy raised her new claim of fraud, nor even after she discovered this new information regarding the timing of the creation of the will document, did she seek to amend her Will Contest to include Gunwall as a potentially responsible party with respect to the new forgery claim, despite his dismissal from the case having come on an interlocutory order. Claims related to the fraudulent creation and execution of Mark's will were tried, but Gunwall was no longer a party so had no opportunity to defend any claims that may have been made against him. Notably, Amy also failed to appeal the order on summary judgment dismissing any and all claims

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Amy so eagerly advises this Court, subject to yet another of her appeals.

against Gunwall, even after the trial concluded and final judgment was entered. Thus, all claims that were made, or that could have been made, against Gunwall in the Will Contest, including claims of forgery, fraud, or conspiracy to commit fraud, are now barred as to Gunwall.[5] Knowing that she missed her opportunity to make these claims against Gunwall in the Will Contest, Amy now seeks to interject them here on appeal.

B. Improper Expansion of the Record on Review.

Amy's pleadings to the Court of Appeals are replete with improper allegations and unsubstantiated "facts"

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[5] Barred by red judicata, collateral estoppel, and applicable statute of limitations. "When res judicata is used to mean claim preclusion, it encompasses the idea that when the parties to two successive proceedings are the same, and the prior proceeding culminated in a final judgment, a matter may not be relitigated, or even litigated for the first time, if it could have been raised, and in the exercise of reasonable diligence should have been raised, in the prior proceeding." *Kelly-Hansen v. Kelly-Hansen,* 87 Wn. App. 320, 328-29, 941 P.2d 1108 (1997) (footnotes omitted).

completely outside the record upon which review is required. Amy also misuses the "Introduction" section of her petition here to make these allegations because the court rules require no citation to the record. Her insertion of these allegations in this section is a deliberate attempt to get her unsubstantiated claims before this Court, because she can cite to no evidence in the record before the trial court on summary judgment.

The decision at issue here, and affirmed by the Court of Appeals, was a dismissal of *all* claims against Gunwall in TEDRA Action No. 1, on summary judgment, because Amy failed to submit evidence sufficient to support her undue influence, exploitation, and fraud claims. In her petition here, Amy improperly interjects allegations, not facts, and argument related to what occurred in TEDRA Action No. 2, ***after*** the claims against Gunwall were also dismissed therein. Amy ignores the record upon which the trial court's summary judgment

dismissing claims against him was based, and instead interjects improper and unfounded allegations of fraud and conspiracy. This, in spite of the trial court's dismissal of claims against Gunwall in TEDRA Action No. 2, wherein all such claims of fraud and conspiracy were tried, and from which no appeal of his dismissal was taken. The decision was proper, and Amy has identified no legal basis for this Court's review of that decision herein.

II. ISSUES PRESENTED FOR REVIEW

RAP 13.4(b) sets forth four reasons for which this Court will accept review of a case. Amy presents no asserted facts or argument that the decision of the Court of Appeals is in conflict with a published decision of the Court of Appeals, nor that there is a significant question of law under the Constitution of the State of Washington or the United States. There remains then, only two issues presented for review:

1. Whether the Supreme Court should accept review of a decision of the Court of Appeals that is not in conflict with any Supreme Court decision? No.

2. Whether the Supreme Court should accept review of an unpublished decision of the Court of Appeals (motion for reconsideration and to publish denied) affirming the trial court's summary dismissal of claims against Gunwall following almost two years of uniquely fact-based litigation involving private parties that does not involve an issue of substantial public interest? No.

III. COUNTERSTATEMENT OF THE CASE

It is telling that 15 of the 22 pages of Amy's petition before this Court focus on facts that she alleges the trial court got wrong in this case and about evidence from the Will Contest, rather than discussing the elements of RAP 13.4(b).[6] Amy now claims that the evidence the

[6] In contrast, the new evidence Amy attempts to introduce from the Will Contest relates to the fraudulent

trial court considered, and sealed, in the *other* lawsuit – the Will Contest – roughly one year after any and all claims against Gunwall were dismissed therein resulting in his dismissal as a party to the lawsuit, and some two years after Amy began making her allegations about Gunwall public, should be considered by this Court as a basis to justify review of this case.[7]

The actual and relevant background and facts are well described in the Court of Appeals' opinion, at pages 3-11 (the "FACTS" section), which Gunwall hereby adopts as his statement of the case.

IV. LEGAL ARGUMENT

A. Amy's Petition Includes Improper Appendices.

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creation of a Will ***after*** Mark's death not while he was still alive (some eight months prior to his death when the beneficiary designations changes took place).

[7]Amy's Appendix improperly contains the Findings of Fact and Conclusions of law from the Will Contest.

RAP 9.1 restricts the record on review to the report of proceedings, clerk's papers, and exhibits. RAP 9.12 further limits the evidence and issues considered to those called to the attention of the trial court before the order on summary judgment was entered. RAP 10.3(a)(8) states that an appendix may not include materials not contained in the record on review without permission of the court. Finally, RAP 13.4(c)(9) states that an appendix shall contain a copy of the Court of Appeals Decision, any order granting or denying a motion for reconsideration of the decision, and copies of statutes and constitutional provisions relevant to the issues presented for review.

Amy submitted, as Appendix B, the *Petitioner's Motion for Reconsideration and Publication*, and as Appendix D, the *Findings of Fact and Conclusions of Law* from the Will Contest. Both appendices contain inadmissible materials submitted to this Court in violation

of the rules of appellate procedure which should not be considered.

B. Amy Cannot Establish any Reason for the Supreme Court to Grant Review.

In spite of Amy's improper inclusion and reliance on improper materials, she has failed to establish that the Court of Appeals decision is in conflict with a decision of this Court or that this matter involves an issue of substantial public interest that should be determined by this Court.

1. The decision of the Court of Appeals is not in conflict with any Supreme Court opinion, including *Keck v. Collins*.

Amy relies solely on *Keck v. Collins, 184 Wn.2d 358, 362, 357 P.3d 1080 (2015)* as the "only case remotely close to this matter."[8] That this case is the only case, by Amy's own admission (or assertion), that is remotely close to her argument, is telling with respect to RAP 13.4(b)(1).

[8] *Petition* at Page 15.

Keck v. Collins involved a complicated procedural history that saw the plaintiff's expert in a medical malpractice case filing successive affidavits in opposition to a summary judgment motion. *Id.* at 364-366. The trial court struck the third affidavit as untimely, but this Court determined that the affidavit should have been admitted and found that it sufficed to defeat the motion for summary judgment. *Id.* at 367. This Court further held that a trial court must apply the factors from *Burnet v. Spokane Ambulance*, 131 Wn.2d 484, 933 P.2d 1036 (1997), when ruling on a motion to exclude ***untimely evidence*** submitted in response to a summary judgment motion. *Id. at 362.*

In spite of Amy's assertions to the contrary, *Keck v. Collins* has absolutely nothing to do with the case at bar. In *Keck v. Collins,* the party opposing summary judgment submitted an affidavit in opposition to the summary judgment motion that the trial court refused to consider.

The affidavit was not "sealed", it was simply excluded from consideration as untimely. In this case, Amy simply failed to submit any evidence whatsoever, or at least admissible and relevant evidence, sufficient to move forward on her claims. There was no evidence, timely or untimely, submitted at the summary judgment hearing to create a genuine issue of material fact regarding whether Gunwall had committed any act that would disqualify him from receiving the Fidelity account as the named beneficiary. There was certainly no evidence that was improperly excluded from consideration that would have changed the outcome of the hearing. The sealed documents in the separate Will Contest trial conducted years later have no bearing on this matter, and even if they did, they were not before the trial court at the time of the hearing on summary judgment which is the subject of this appeal.

2. The petition does not involve an issue of substantial public interest that should be determined by the Supreme Court.

a. The test for substantial public interest.

To determine whether a case presents an issue of continuing and substantial public interest, three factors must be considered: (1) the public or private nature of the question presented, (2) the desirability of an authoritative determination for the future guidance of public officers, and (3) the likelihood of future recurrence of the question. *State v. Beaver*, 184 Wn.2d 321, 330-31, 358 P.3d 385, 390 (2015). Continuing and substantial public interest has generally been shown in cases dealing with constitutional interpretation, the validity of statutes or regulations, and matters that are sufficiently important to the appellate court. *Id.* It is not used in cases that are limited to their specific facts. *Id.* None of the three factors is present in this case and it is notable that Amy fails to

discuss *any* legal authority surrounding what constitutes continuing and substantial public interest.

This complicated and very fact-specific case involves hotly disputed claims related to the larger Besola family – Amy, Mark, and others. Overwhelming evidence was submitted at summary judgment regarding Mark's communications expressing his hatred of his sisters, Amy specifically, and his desire to ensure that she did not inherit from him. The circumstances regarding Mark's health, drug abuse, and living arrangements were extremely unique set of facts arising out of the private life of the decedent. The case involves no constitutional questions, nor does it involve the interpretation of any statutes. A decision here will not affect or provide any guidance whatsoever for public officers.

b. Amy incorrectly states the burden of proof on Summary Judgment and mischaracterizes the facts of the case in an attempt create an issue of public interest.

Amy incorrectly and improperly states that Gunwall, a respondent at the trial court level, who she alleged to have engaged in some wronging that caused him to be named as the beneficiary of Mark's Fidelity accounts, had the burden of proving the details and authenticity of his designation as beneficiary. This is not the law. Often the beneficiary may not even know that he has been so named until after the death of the account holder.

There is simply no legal basis or authority for the position taken by Amy that she does not bear the burden of proving her claims but that, instead, it is somehow Gunwall's burden to prove that his designation as beneficiary, as shown in the records of the company holding the account, was properly made. The law is, in fact, the opposite, and even more so on summary judgment. When a party claims undue influence, as Amy did here, the evidentiary standard for the accuser is

exceedingly high and must prove their claim by clear, cogent, and convincing evidence. *In re Estate of Lint*, 135 Wn.2d 518, 535 (1998); *In re Estate of Mumby*, 97 Wn.App. 385, 391 (1999). The court is to consider the claims on summary judgment through this lens. *Anderson v. Liberty Lobby, Inc.*, 477, U.S. 242, 254, 106 S. Ct. 2505, 91 L.Ed.2d 202 (1986). Finally, when evaluating these claims, a party is entitled to judgment as a matter of law if the higher standard is not met. *Kitsap Bank v. Denley,* 177 Wn. App. 559, 569, (2013); *Woody v. Stapp,* 146 Wn. App. 16, 22 (2008); *accord Anderson,* 477 U.S. at 252.

A party may move for summary judgment by (1) setting out its own version of the facts and alleging that there is no genuine issue as to the facts set forth, or (2) by pointing out that the nonmoving party lacks sufficient evidence to support its case. *Pac. Nw. Shooting Park Ass'n v. City of Sequim,* 158 Wn.2d 342, 350 (2006); *Guile v. Ballard Cmty. Hosp.,* 70 Wn. App. 18, 21 (1993). In a

summary judgment motion, the moving party has the initial burden of showing the absence of an issue of material fact. This burden can be met by showing that there is an absence of evidence supporting the nonmoving party's case. *Celotex Corp. v. Catrett*, 477 U.S. 317, 325, 91 L. Ed. 2d 265, 106 S. Ct. 2548 (1986); *Young v. Key Pharmaceuticals, Inc.*, 112 Wn.2d 216, 225-26, 770 P.2d 182 (1989). In this situation, the moving party is not required to support the motion by affidavits or other materials negating the opponent's claim. *Celotex*, 477 U.S. at 322-23; *Young*, 112 Wn.2d at 225-26. Complete failure of proof concerning an essential element of the nonmoving party's case necessarily ***renders all other facts immaterial.*** *Young*, 112 Wn.2d at 225 (quoting *Celotex Corp.*, 477 U.S. at 322-23) and *Weatherbee v. Gustafson*, 64 Wn. App. 128, 132, 822 P.2d 1257, 1259 (1992) (Emphasis added).

Once the moving party satisfies its burden, the nonmoving party must present evidence demonstrating that a material fact remains in dispute. *Vallandigham v. Clover Park Sch. Dist. No. 400,* 154 Wn.2d 16, 26 (2005). "'A material fact is one upon which the outcome of the litigation depends, in whole or in part.'" *Hisle v. Todd Pac. Shipyards Corp.,* 151 Wn.2d 853, 861 (2004) (quoting *Barrie v. Hosts of Am., Inc.,* 94 Wn.2d 640, 642 (1980)). The nonmoving party may not rest on mere allegations or denials from the pleadings. CR 56(e). The response must set forth ***specific admissible facts*** that reveal a genuine issue for trial. *Grimwood v. Univ: of Puget Sound, Inc.,* 110 Wn.2d 355, 359 (1988) (emphasis added). Inadmissible evidence is irrelevant to summary judgment proceedings. *Lynn v. Labor Ready, Inc.*, 136 Wn. App. 295, 306, 151 P. 3d 201 (2006). Conclusions and speculation are insufficient. *Grimwood, supra,* at 360. A fact is "what took place, an act, an incident, a reality as

distinguished from supposition or opinion." *Grimwood v. Univ. of Puget Sound, Inc.*, 110 Wn.2d 355, 359, 753 P.2d 517 (1988). The "facts" required by CR 56(e) to defeat a summary judgment motion are evidentiary in nature. *Grimwood*, 110 Wn.2d at 359. Finally, questions of fact may be determined on summary judgment as a matter of law where reasonable minds could reach but one conclusion." *Smith v. Safeco Ins. Co.*, 150 Wn.2d 478, 485, 78 P.3d 1274 (2003).

In *Denley*, there was a challenge by an Estate claiming that the beneficiary of a bank account payable on death was not entitled to the funds in the account because the designation was the result of undue influence. There, the beneficiary moved for summary judgment to dismiss the claim. The Court recognized that in order to defeat a summary judgment to dismiss a claim of undue influence, the party bearing the burden to prove the undue influence claim at trial must present sufficient evidence to make it

highly probable that the undue influence claim will prevail at trial. *Denley* at 569-570. A trial court may grant a summary judgment motion to dismiss if no rational trier of fact, viewing the evidence in the light most favorable to the nonmoving party, could find clear, cogent, and convincing evidence ***on each element***. *Id.* (emphasis added).

In spite of Amy's unfounded allegations, suspicions, and defamatory accusations there is no evidence in the record (nor does she even attempt to cite to any) to substantiate her claims. Her petition is completely void of citations to the record to support her claims that Gunwall took any action, electronic or otherwise, to access or change the beneficiary of the Fidelity Accounts. After almost two years of discovery, and without any evidence whatsoever to prove any wrongdoing by Gunwall, the trial court properly dismissed the claims as a matter of law based upon the above cited

authorities, and the Court of Appeals properly upheld the trial court's decision.

Amy goes further and relies upon these unfounded allegations regarding the use of a "cell phone app" to argue that there is substantial public interest in regulating how beneficiary designations are effectuated. Not only is there no evidence of failed security, or authentication in using them, such regulation of the financial, investment, and life insurance companies is a legislative matter, not a judicial one, especially when there are absolutely no facts to support such intervention. Here, Amy simply fabricates evidence to claim there is a public interest in this case. There is not.

V. CONCLUSION

The petition fails to set forth any justification under RAP 13.4 for Supreme Court review. The decision of the Court of Appeals to affirm the trial court's dismissal of claims on summary judgment because there was

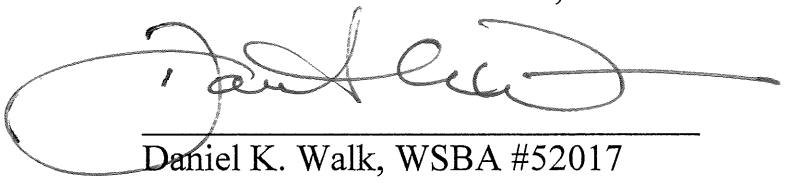
insufficient evidence to support them is not at odds with any Supreme Court decision and it presents no issue of continuing substantial public interest. It is a standard summary judgment case arising out of a unique set of facts arising out of the administration of a decedent's estate. As such, the petition for review should be denied.

CERTIFICATE OF COMPLIANCE

The undersigned certifies that the foregoing answer is typed in Times New Roman, 14 point, and contains 4,587 words, pursuant to RAP 18.17.

DATED this 14th day of October, 2022.

MORTON McGOLDRICK, PLLC



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CERTIFICATE OF SERVICE

I, Susan Toma, declare under the penalty of perjury of the laws of the State of Washington that on October 14, 2022, I caused a copy of BRANDON GUNWALL'S ANSWER TO AMELIA BESOLA'S PETITION FOR REVIEW to be served, as follows:

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Dated this 14th day of October, 2022 at Tacoma, Washington.

Susan K. Toma

MORTON MCGOLDRICK

October 14, 2022 - 11:48 AM

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