No. 1028342
Court of Appeals No. 84922-1-I

THE SUPREME COURT
OF THE STATE OF WASHINGTON

HAI EN MAI and JULIANNE STUTZMAN-MAI,

Plaintiffs / Appellants,

vs.

PHILLIPS LAW FIRM, PLLC, RALPH GLENN PHILLIPS and KATHRYN MOORE PHILLIPS,

Defendants / Respondents.

RESPONDENTS' ANSWER TO APPELLANTS' PETITION FOR REVIEW

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TABLE OF CONTENTS

Page

TABLE OF AUTHORITIES

Page(s)

Cases

Rules

Statute

I. IDENTITY OF PETITIONER

Respondents Phillips Law Firm, PLLC, and Ralph Glenn Phillips (collectively "PLF") answer and oppose the February 23, 2024 Petition for Review (the "Petition") of Plaintiffs / Appellants Hai En Mai and Julianne Stutzman-Mai (collectively "the Mais").

II. CITATION TO COURT OF APPEALS DECISION

The Court of Appeals affirmed the trial court's dismissal of the Mais' Consumer Protection Act claim against PLF in an unpublished opinion in *Hai En Mai and Julianne Stutzman-Mai v. Phillips Law Firm, PLLC*, No. 84922-1-I (Wash. Ct. App. December 18, 2023) (unpublished), attached to the Mais' Petition for Review at Appendix A.

The Court of Appeals held that the trial court did not err by granting PLF's CR 12(c) motion dismissing the Mais' CPA claim for failure to show that PLF's alleged deceptive acts caused injury to the Mais' business or property. *Id.* at 1. The Court of Appeals reasoned that (1) the Mais cited no legal authority

supporting their contention that the inability to use property they *expected* to acquire (personal injury damages) is an injury under the CPA; (2) the trial court's award of $1,248 to the prevailing party for attorney fees against the Mais, which PLF paid on their behalf, was not a "judgment" against Hai En Mai, and the Mais suffered no economic injury; (3) PLF's alleged deceptive acts did not cause Hai En Mai to miss work to attend arbitration because his personal injury claim was subject to mandatory arbitration under the King County local rules; (4) the Mais were not entitled to treble damages and attorney fees under the CPA because they had failed to show injury to their "business or property"; and (5) the Mais were not entitled to an injunction preventing PLF from deceptive advertising because the CPA does not authorize injunctive relief for claimants who fail to show injury to their business or property. *Id.* at 7-9.

III. COUNTER-STATEMENT OF ISSUES

1. Should this Court accept review under RAP 13.4(b) of any of the Mais' assignments of error where they are all raised for the first time on appeal? **No.**

2. Should this Court accept review under RAP 13.4(b) of any of the Mais' assignments of error where the Court of Appeals affirmed the trial court on grounds established by the pleadings and supported by the record? **No.**

3. Should this Court accept review under RAP 13.4(b) where the Court of Appeals correctly decided that the Mais had failed to show injury to their business or property and affirmed dismissal of their CPA claim? **No.**

4. Should this Court accept review under RAP 13.4(b) where the Court of Appeals correctly decided that the trial court's award of $1,248 to the prevailing party for attorney fees against the Mais, which PLF paid on their behalf, was not a "judgment" against Hai En Mai, and the Mais suffered no economic injury? **No.**

IV. COUNTER-STATEMENT OF THE CASE

A. Mr. Mai's Motor Vehicle Accident

On October 4, 2017, Appellant Hai En Mai ("Mr. Mai") was involved in a minor vehicular accident with Hope Campbell ("Ms. Campbell"). Clerk's Papers (CP) 3. Mr. Mai sought chiropractic care, massage therapy, and acupuncture for his injuries and incurred $5,659.43 in total medical specials. CP 255.

B. PLF's Representation of Mr. Mai

On May 7, 2018, Mr. Mai retained PLF to file a lawsuit against Ms. Campbell for personal injuries and vehicle damage stemming from the accident. CP 3. PLF filed suit against Ms. Campbell on September 17, 2020, prior to the expiration of the statute of limitations. *Id.*

Mr. Mai's case was transferred to mandatory arbitration and was arbitrated on November 17, 2021. CP 4. The arbitrator found for Ms. Campbell after her requests for admission were deemed admitted due to PLF's failure to respond. CP 256. After the arbitration, PLF requested a trial de novo. *Id.* Ms. Campbell opposed PLF's request because it was made after the twenty-day deadline and because PLF had failed to secure Mr. Mai's signature on the form. *Id.* PLF's request was ultimately denied, and Ms. Campbell was awarded attorneys' fees in the amount of $1,248 (which PLF paid). *Id*; CP 551.

C. The Mais' Lawsuit Against PLF

The Mais filed this lawsuit on August 10, 2022, alleging

in relevant part that PLF's actions not only constituted legal malpractice, but also a violation of the Consumer Protection Act. CP 4-5. On October 7, 2022, PLF filed a Motion to Dismiss, which argued that the Mais' CPA claim should be dismissed because they cannot prove that they have suffered any damage to their "business or property," which is a necessary element of a valid CPA claim. *See generally* CP 468-78.

PLF's Motion argued that the Mais' stated damages – the personal injury damages they would have recovered in their underlying lawsuit against Ms. Campbell had PLF not been negligent – did not qualify as injury to their "business or property." CP 472-75. The trial court agreed and dismissed the Mais' CPA cause of action. CP 617-21.

On appeal, the Mais' arguments remained substantially the same, arguing that they had alleged sufficient injury to their "business or property" to satisfy this required element under the CPA. The Court of Appeals held that the trial court did not err in granting PLF's CR 12(c) motion dismissing the Mais' CPA

claim because the Mais had failed to show that PLF's alleged deceptive acts caused injury to their business or property. *Mai*, No. 84922-1-I at 1, 7-9.

The Mais then brought a motion for reconsideration before the Court of Appeals, arguing for the first time that (1) Mr. Mai's personal injury cause of action against Ms. Campbell was itself "property" under the CPA and (2) the trial court's order awarding attorneys' fees to Ms. Campbell in the amount of $1,248 was a "final judgment" against the Mais. *Appellants' Motion for Reconsideration dated January 4, 2024 at 1*. The Court of Appeals denied the Mais' motion for reconsideration. *Order Denying Motion for Reconsideration dated January 25, 2024*. The Mais' Petition to this Court followed.

V. ARGUMENT

A. Considerations Governing Acceptance of Review

RAP 13.4(b) provides a petition for review will be accepted by the Supreme Court only if:

> (1) The decision of the Court of Appeals is in conflict with a decision of the Supreme Court;

(2) The decision of the Court of Appeals is in conflict with another decision of the Court of Appeals;

(3) A significant question of law under the Constitution of the State of Washington or of the United States is involved; or

(4) The petition involves an issue of substantial public interest that should be determined by the Supreme Court.

The Mais proceed under RAP 13.4(b)(1) and (4). Because the Court of Appeals decision is consistent with decisions of this Court and does not involve an issue of substantial public interest, this Court should deny the Petition.

B. This Court Does Not Review Issues Raised for First Time on Appeal

As an initial matter, this Court should deny the Mais' Petition because neither of the issues raised in the Petition were before the trial court. Generally, appellate courts do not consider issues raised for the first time on appeal. *Kut Suen Lui v. Essex Ins. Co.*, 185 Wn.2d 703, 719, 375 P.3d 596 (2016); RAP 2.5(a)).

Here, both issues raised in the Mais' Petition were raised for the first time in the Mais' Motion for Reconsideration of the

Court of Appeals December 18, 2023 opinion. At no point prior to their Motion for Reconsideration did the Mais raise or brief these issues. Accordingly, this Court should decline to grant review of either of these issues.

C. The Court of Appeals Properly Affirmed the Trial Court on Grounds Established by the Pleadings and Supported by the Record

The Mais contend that the Court of Appeals erred by "affirm[ing] the Superior Court's ruling on two grounds that were not at issue and therefore not briefed: (1) whether a cause of action is "property", and (2) whether the Superior Court's final ruling in the underlying personal injury case was a 'final judgment' for purposes of appeal." Petition at 8-9. This contention is incorrect and is not a reason for this Court to accept review of the Court of Appeals decision for two reasons.

First, the Court of Appeals did not affirm the trial court's ruling for either of the reasons the Mais cite. The Court of Appeals actually held that (1) the Mais cited no legal authority supporting their contention that the inability to use property they

expected to acquire (personal injury damages) is an injury under the CPA; (2) the trial court's award of $1,248 to the prevailing party for attorney fees against the Mais, which PLF paid on their behalf, was not a "judgment" against Hai En Mai, and the Mais suffered no economic injury; (3) PLF's alleged deceptive acts did not cause Hai En Mai to miss work to attend arbitration because his personal injury claim was subject to mandatory arbitration under the King County local rules; (4) the Mais were not entitled to treble damages and attorney fees under the CPA because they had failed to show injury to their "business or property"; and (5) the Mais were not entitled to an injunction preventing PLF from deceptive advertising because the CPA does not authorize injunctive relief for claimants who fail to show injury to their business or property. *Mai*, No. 84922-1-I at 7-9. The Mais' Petition mischaracterizes the basis for the Court of Appeals opinion in order to manufacture reasons for this Court to accept review. This Court should decline to do so.

Second, the appellate court "may affirm the trial court on

any grounds established by the pleadings and supported by the record." *Truck Ins. Exch. v. VanPort Homes*, 147 Wn.2d 751, 766, 58 P.3d 276 (2002). The Court of Appeals' holdings above were based upon the facts of the case as applied to the Mais' CPA claim. The Mais do not allege that the Court of Appeals relied on facts not in the record or mistook the facts in the record to dismiss their CPA claim. Accordingly, the Court of Appeals properly affirmed the trial court's decision on grounds established by the pleadings and supported by the record, and this Court should decline to grant review of either of these issues.

D. The Mais' Petition Does Not Involve an Issue of Substantial Public Interest that Should be Determined by this Court under RAP 13.4(b)(4)

Under RAP 13.4(b)(4), a petition for review will be accepted by the Supreme Court only if the petition involves an issue of substantial public interest that should be determined by the Supreme Court. The Mais argue that this Court should accept review of this matter because lawyer advertising has increased "the prospect of CPA violations in the entrepreneurial aspects of

law" and that this Court must resolve the question of "whether CPA liability is a potential remedy where a party's lawsuit (property) is damaged or destroyed as a result of the entrepreneurial actions of a lawyer." Petition at 9. This is an incorrect reading of the issues in this case.

PLF does not dispute that plaintiffs may bring CPA claims against their lawyers related to the entrepreneurial aspects of the practice of law, including lawyer advertising. The true issue in this case is whether the Mais alleged the right kind of damages to sustain a CPA claim – injury to their business or property. *Hangman Ridge Training Stables, Inc. v. Safeco Title Ins. Co.*, 105 Wn.2d 788, 780, 719 P.2d 531 (1986). They have not.

As discussed in detail below, injury to property under the CPA occurs when one's "right to possess, use, or enjoy a *determinate* thing has been affected in the slightest degree." *Handlin v. On-Site Manager Inc.*, 187 Wn. App. 841, 849, 351 P.3d 226 (2015) (*citing Ambach v. French*, 167 Wn.2d 167, 172, 216 P.3d 405 (2009)) (emphasis added). Here, Mr. Mai's

personal injury cause of action had no *determinate* value as required by the CPA beyond any damages award that he may have eventually recovered. The Mais' cite no authority establishing that the impact of legal malpractice on an unresolved personal injury action constitutes an injury to business or property under the CPA. *See* Petition at 10-18.

Contrary to the Mais' claims, the issue of whether the Mais have demonstrated an injury to their business or property sufficient to sustain a CPA claim is specific to the facts of the Mais' case and does not involve an issue of substantial public interest. Accordingly, this Court should deny review under RAP 13.4(b)(4).

E. The Mais have Failed to Show that an Indeterminate, Unquantifiable Impact on Their Personal Injury Cause of Action is an Injury to Business or Property under the CPA

The Mais's Petition goes to great lengths attempting to establish that their personal injury cause of action against Ms. Campbell was itself "property" for purposes of the CPA. Petition at 10-19. They appear to allege that if the cause of action itself

was indeed property, then they have established the injury to business or property prong of a CPA claim. *See Id.* But the Mais are incorrect because they have still not established a measurable *injury* to their property as required by the CPA.

To prove their cause of action under the CPA, the Mais must establish each of the following elements: (1) that the defendant engaged in an unfair or deceptive act or practice; (2) that the act occurred in trade or commerce; (3) that the act impacts the public interest; (4) that the plaintiff suffered injury to his or her business or property; and (5) that the injury was causally related to the unfair or deceptive act. *Hangman Ridge Training Stables, Inc. v. Safeco Title Ins. Co.*, 105 Wn.2d 788, 780, 719 P.2d 531 (1986). A failure to meet any one of these elements is fatal to their claim. *Id.* at 793.

Injury to property under the CPA occurs when one's "right to possess, use, or enjoy a *determinate* thing has been affected in the slightest degree." *Handlin v. On-Site Manager Inc.*, 187 Wn. App. 841, 849, 351 P.3d 226 (2015) (*citing Ambach v. French*,

167 Wn.2d 167, 172, 216 P.3d 405 (2009)) (emphasis added).

The loss of property, however, "presupposes an interest in the property that a plaintiff claims to have been unable to enjoy." *Hartman v. Nationwide Mut. Ins. Co.*, 156 Wn. App. 1006, 3 (2010) (unpublished).[1] In *Hartman*, the plaintiff, Hartman, applied for and obtained a "Guaranteed Renewable Disability Income Policy" from Nationwide. *Id.* at 1. Under the policy, if Hartman became disabled, he would receive a maximum monthly payment of $5,000 for up to five years. *Id.*

Four years later, Hartman requested the cancellation of his policy. *Id.* In response, Assurity (who had assumed responsibility for administering Hartman's policy from Nationwide), sent Hartman a "conservation letter" which misstated his maximum monthly benefit as being $10,000. *Id.* After receiving the letter, Hartman changed his mind and decided

[1]Under GR 14.1(a), unpublished opinions of the Court of Appeals filed on or after March 1, 2013, may be cited as nonbinding authorities.

not to cancel his policy. *Id.* He paid the outstanding premium balance, and the policy remained in force. *Id.*

Two months later, Hartman became disabled. *Id.* at 2. He filed a claim with Assurity for benefits under his policy. *Id.* Instead of paying him $10,000 per month, however, Assurity only paid him $5,000. *Id.* Hartman filed a lawsuit against Assurity which alleged that it had violated the CPA by misrepresenting his disability benefits in the conservation letter. *Id.* He requested the unpaid / underpaid disability benefits, treble damages, and attorney fees. *Id.*

Assurity filed a motion for summary judgment seeking dismissal of Hartman's CPA claim, which the trial court granted. *Id.* The Court of Appeals affirmed the trial court's decision, explaining that Assurity's alleged "underpayment" of Hartman's benefits did not constitute an injury to his "business or property" because he never had a property interest in the additional $5,000 per month. *Id.* The Court explained that the only loss of "property" suffered by Hartman was for the premium payments

that he made after deciding to retain his policy (which he did not claim as an injury). *Id.* at 4. Because he only had a property interest in $5,000 per month, his claim of unpaid / underpaid benefits "amount[ed] to a claim to monies that he had no right to receive." *Id.*

The Mais, like the plaintiff in *Hartman*, have no property interest in Mr. Mai's personal injury award. Mr. Mai's personal injury cause of action has no *determinate* value as required by the CPA beyond any damages award that he may have eventually recovered. Although PLF admits that, but for its negligence, it is *likely* that Mr. Mai would have recovered from Ms. Campbell at the conclusion of his lawsuit against her, there was never any guarantee of recovery, let alone recovery of a determinate amount. Even if PLF had answered Ms. Campbell's requests for admission, the arbitrator's award to Mr. Mai was discretionary. While it is undisputed that Ms. Campbell was at fault, the arbitrator could have determined that Mr. Mai did not suffer any compensable injuries. Accordingly, Mr. Mai's unresolved

personal injury cause of action had no determinate value and the dismissal of the action does not amount to an injury to the Mais' "business or property" that is compensable under the CPA.

Nowhere in the Mais' extensive discussion of state and federal law[2] do they cite any authority establishing that the impact of legal malpractice on an unresolved cause of action for personal injury constitutes an injury to business or property under the Washington State CPA. *See* Petition at 10-18. Neither do they cite any authority establishing that an indeterminate, unquantifiable injury to a cause of action can be the basis of a

[2]The Mais' Petition contains a large section devoted to the argument that the Court of Appeal's decision is in conflict with federal law establishing that a cause of action is property. *See* Petition at 13-17. However, the Mais do not allege that this Court should grant review because "a significant question of law under the Constitution of . . . the United States is involved." RAP 13.4(b)(3). Nor do the Mais cite any federal case law establishing that the impact of legal malpractice on an unresolved personal injury action constitutes an injury to business or property under the Washington State CPA. Moreover, whether the Court of Appeal's decision is in conflict with federal case law is not relevant to this Court's decision whether to grant review for purposes of RAP 13.4(b)(1) or RAP 13.4(b)(4), under which the Mais make their Petition for Review.

CPA claim. *See Id.* They alleged that when Mr. Mai first met with PLF, he possessed property, the personal injury cause of action, "that had value," which PLF destroyed. Petition 18-19. However, this argument does nothing to place a determinate value on Mr. Mai's unresolved cause of action, as is required by the CPA for purposes of showing injury to property.

Accordingly, the Court of Appeals correctly held that the Mais cited no legal authority supporting their contention that the inability to use property they *expected* to acquire is an injury under the CPA. This Court should deny review under RAP 13.4(b)(1) where no decision of this Court is contrary to the Court of Appeals' holding that the Mais had failed to show injury to their business or property under the CPA.[3]

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[3]As an additional matter, the Mais devote a significant portion of their Petition characterizing PLF as a bad actor because of the way PLF advertises their services. *See* Petition at 7-8. But the content of PLF's advertising is beside the point here, because Hai En Mai admitted that he was not motivated to retain PLF by their advertising because he never saw it prior to retaining PLF. CP 576-77. As a result, the Mais cannot establish that any injury

F. The Trial Court's Award of $1,248 to Ms. Campbell for Attorney Fees, which PLF Paid, was not a Money Judgment Entered Against the Mais and Does Not Constitute an Injury to Their Business or Property

The Mais allege that the trial court's January 27, 2021 order was a "final judgment" within the meaning of RAP 2.2, CR 54, and *Denney v. City of Richland*, 195 Wn.2d 649, 462 P.3d 842 (2020). Petition at 19-23. The Mais appear to contend that because the order was a final judgment, the award of $1,248 in attorney's fees was somehow converted into a money judgment against them, establishing an injury to their business or property under the CPA. *See Id.* This is incorrect. Because the award of $1,248 was an attorney fee award to the prevailing party and not a money judgment against the Mais, it was not an injury to their business or property under the CPA and this Court should decline to grant review on this issue.

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they suffered was causally related to any alleged unfair or deceptive act, which is fatal to their CPA claim. *Hangman Ridge*, 105 Wn.2d at 780, 793. Accordingly, the Court of Appeals properly affirmed the trial court's dismissal of the Mais' CPA claim and this Court should decline to grant review.

Washington law makes a distinction between an award of attorney fees and a money judgment. "The general rule in Washington is that attorney fees will not be awarded for costs of litigation unless authorized by contract, statute, or recognized ground of equity." *Durland v. San Juan County*, 182 Wn.2d 55, 76, 340 P.3d 191 (2014). By contrast, monetary judgments are judgments for a legal remedy. *See Auburn Mechanical, Inc. v. Lydig Const., Inc.*, 89 Wn. App. 893, 901-02, 951 P.2d 311 (1998) (distinguishing between monetary damages, which are legal in nature, and coercive orders such as injunctions or decrees of specific performance, which are equitable in nature), *review denied*, 163 Wn.2d 1009 (1998). An attorney fee award is not a money judgment. *See Bowles v. Wash. Dep't of Ret. Sys.*, 121 Wn.2d 52, 76, 847 P.2d 440 (1993) (distinguishing an award of attorney fees from a judgment under RCW 4.56.110(3)).

Here, Ms. Campbell requested attorney fees in the amount of $1,248 under SCCAR 7.3. CP 132. SCCAR 7.3 provides that "[t]he court *shall* assess costs and reasonable attorney fees

against a party who appeals the award and fails to improve the party's position on the trial de novo." (Emphasis added). The court may only assess costs and reasonable attorney fees incurred after a request for a trial de novo is filed. *Id.* In this case, the trial court awarded Ms. Campbell her attorney fees in the amount of $1,248 under SCCAR 7.3. *See* CP 132, 135. The trial court made no findings with respect to the merits of the underlying personal injury claims and entered no money judgment for either party on that basis. CP 134-36. Moreover, PLF paid the $1,248 on the Mais' behalf. CP 551. Accordingly, the Court of Appeals did not err in holding that the award of $1,248 to the prevailing party for attorney fees, which PLF paid on the Mais' behalf, was not a "judgment" and that the Mais suffered no economic injury supporting a CPA claim as a result.

The Mais argue that the January 27, 2021 order granting Ms. Campbell her attorney fees in the amount of $1,248 was a "final judgment" against them within the meaning of RAP 2.2, CR 54, and *Denney v. City of Richland*, 195 Wn.2d 649, 462 P.3d

842 (2020). Petition at 19-23. This argument has no impact on the determination of whether the Mais' suffered an injury to their business or property under the CPA. Even if the January 27, 2021 order was a final judgment in the underlying personal injury action, the $1,248 award against the Mais was an award of attorney fees, not a money judgment. Not only was this award not a money judgment, but PLF paid the attorney fee award on the Mais' behalf.

No money judgment was ever entered against the Mais and they ultimately did not have to pay anything. Accordingly, the Court of Appeals did not err in holding that the Mais suffered no economic injury supporting a CPA claim. This Court should deny review under RAP 13.4(b)(1) where no decision of this Court is contrary to the Court of Appeals' holding that the Mais had failed to show injury to their business or property under the CPA.

VI. CONCLUSION

The Mais' Petition demonstrates that (1) review is *not*

appropriate under RAP 13.4(b)(1) because no decision of this Court is contrary to the Court of Appeals' holding that the Mais failed to show injury to their business or property under the CPA, and (2) review is *not* appropriate under RAP 13.4(b)(4) because the issue of whether the Mais have demonstrated an injury to their business or property under the CPA is specific to the facts of the Mais' case and does not involve an issue of substantial public interest. For the reasons outlined above, PLF respectfully request that this Court deny the Petition.

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RAP 18.17 CERTIFICATION

I certify that this brief contains 3,892 words (excluding words contained in appendices, title sheet, table of contents, table of authorities, certificate of compliance, certificate of service, signature blocks, and pictorial images) in compliance with RAP 18.17.

DATED this 22nd day of March, 2024.

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CERTIFICATE OF SERVICE

I certify that I initiated electronic service of the foregoing document via the Court's eFiling Application to counsel of record:

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FORSBERG & UMLAUF, P.S.

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