IN THE SUPREME COURT
OF THE STATE OF WASHINGTON

Supreme Court No. 90113-9

(Court of Appeals No. 70758-2-I)

FILO FOODS, LLC, BF FOODS, LLC, ALASKA AIRLINES, INC., and WASHINGTON RESTAURANT ASSOCIATION,

Petitioners/Plaintiffs,

v.

CITY OF SEATAC,

Respondent/Defendant,

v.

SEATAC COMMITTEE FOR GOOD JOBS,

Respondent/Intervenor.

PLAINTIFFS' REPLY IN SUPPORT OF MOTION FOR CONSOLIDATION

Harry J. F. Korrell, WSBA #23173
Roger A. Leishman, WSBA #19971
Davis Wright Tremaine LLP
1201 Third Avenue, Suite 2200
Seattle, WA 98101-3045
(206) 622-3150 Phone
(206) 757-7700 Fax

Cecilia Cordova, WSBA # 30095
Pacific Alliance Law, PLLC
601 Union St. Suite 4200
Seattle, WA 98101
(206) 652-3592 Phone
(206) 652-3205 Fax

I. INTRODUCTION

Every issue raised by the parties regarding the validity of the SeaTac Ordinance is ***already before this Court*** in the Summary Judgment Appeal, Case No. 89723-9. Piecemeal appeals are strongly disfavored because they do not promote the orderly administration of justice. *See, e.g., Fox v. Sunmaster Prods., Inc.*, 115 Wn.2d 498, 503-04, 798 P.2d 808 (1990). Cases should be resolved consistently and on their merits. *See* RAP 1.2. The Court should therefore consolidate this appeal with the Summary Judgment Appeal, and maintain the agreed briefing schedule and oral argument date set in its April 2, 2014 Order in Case No. 89723-9.

II. REPLY ARGUMENT FOR CONSOLIDATION[1]

These two appeals involve the same action and the same municipal Ordinance. Plaintiffs/Petitioners Filo Foods, LLC, BF Foods, LLC, Alaska Airlines, Inc., and Washington Restaurant Association successfully challenged the application of the Ordinance to employers at Sea-Tac International Airport, and unsuccessfully challenged its application to employers elsewhere in the City of SeaTac. Because the parties have appealed from both rulings in the Summary Judgment Appeal, which is

[1] No party opposed Plaintiffs' motion for accelerated review, and the motion is now moot in light of the fact that the Court has already scheduled consideration of both the Motion for Consolidation and the Petition for Review on April 29, 2012.

before this Court on direct review in an appeal from a final judgment, ***all*** issues regarding the sufficiency of the petition signatures are already before the Court. Formal consolidation will therefore promote the orderly administration of justice, efficiency, and consistency.

1. Each party's contentions regarding the sufficiency of the petition signatures are already within the scope of the Summary Judgment Appeal. The superior court ruled that the Ordinance does not apply to employers at the Airport, and that portions of the Ordinance are preempted by federal labor law. Plaintiffs argue that these rulings may be upheld on numerous alternative grounds, including the lack of sufficient valid signatures. *See* Respondents' Brief at 25-31. Plaintiffs are entitled to argue for affirmance on any ground supported by the record. *Washburn v. City of Federal Way*, 178 Wn.2d 732, 753 n.9, 310 P.3d 1275 (2013). *See also* City Ans. to Consolid. Mot. at 1 ("Plaintiffs' [sic] have argued the same issues likely to be raised in this appeal under cause No. 89723-9"). And because the Summary Judgment Appeal is before this Court on direct review in an appeal as of right, rather than in the discretionary review of a prior appellate opinion, the Court's consideration is not limited to specific issues. *Contrast* RAP 2.4 and RAP 13.6; *see also* RAP 2.5(c)(2) (Court of Appeals' interlocutory ruling does not limit this Court's ability to consider any issue).

The City and Committee have the opportunity to rebut each of Plaintiffs' arguments in their reply briefs on the merits, due May 2, 2014. Potential amici likewise are well aware of the range of issues presented by this case, and will have the opportunity to timely move for leave to submit briefs pursuant to RAP 10.6. Each interested party or amicus can argue that even without striking signatures from individuals who signed more than once pursuant to RCW 35A.01.040(7), the petitions actually contained more than the minimum required. The parties themselves made such arguments in each of the lower courts. *See, e.g.,* Committee's 8/14/2013 Opp'n to Mot. for Writs at 6-10; Committee's 8/29/13 Emergency Mot. for Discretionary Rev. at 5-13.

Each of the signature sufficiency issues identified by the City and the Committee regarding the role of the King County Auditor and the conduct of the SeaTac Petition Review Board thus ***already*** is properly before the Court for determination in the pending appeal. There is no reason to carve out these issues for renewed consideration and repeated briefing in separate redundant appellate proceedings between the same parties. To the contrary, formal consolidation at this time would promote administrative efficiency and consistency, and avoid any uncertainty regarding the finality of the appeal.

2. This interlocutory appeal should be considered together with the pending appeal from the final judgment entered in the same case. The City and the Committee also argue that this case should be treated as involving two separate and unrelated "phases" of the case, and that the lower courts' rulings can only be reviewed in separate appeals. Committee's Answer to Motion for Consolidation at 2. According to the Committee, Case No. 89723-9 is merely the "Declaratory Judgment Appeal," and is limited to issues briefed by the parties in connection with the December 2013 superior court hearing before Judge Darvas. *Id.* at 8. Both the Committee and the City now suggest that the court did not resolve the parties' claims on summary judgment. *Id.* at 6 n.3; City Ans. to Pet. for Rev. at 2. But it is undisputed that the superior court considered the parties' motions as a matter of summary judgment pursuant to CR 56, and that its December 27, 2013 order was a final judgment disposing of all claims in the case. *See, e.g.,* Ex. A (10/31/13 email from counsel for City regarding application of CR 56); Ex. B (1/14/14 letter from Clerk regarding finality of judgment). Although the Committee initiated this Court's review by filing a notice for discretionary review, after receiving comments from all parties, the Court determined that the December 27, 2013 decision was a final appealable order resolving the remaining claims in the case. *See* Ex. B at 1-2. The parties' notices of appeal from this final

judgment therefore brought up for review all of the lower court's rulings. RAP 2.4(b).

The Committee also argues that the Court should deny consolidation on the grounds that any challenge to the sufficiency of initiative petitions after an election is "moot." Committee Ans. at 13 (citing *Sequim v. Malkasian*, 157 Wn.2d 251, 138 P.3d 943 (2006)). But as in *Sequim*, Plaintiffs did not bring this "action solely to prevent an election." 157 Wn.2d at 259. Even after an election, parties may challenge the validity of legislation on the grounds that the initiative was not properly presented to the voters. *Id.*; *see also Washington Ass'n for Substance Abuse and Violence Prevention v. State*, 174 Wn.2d 642, 278 P.3d 632 (2012).[2] This Court has recognized the prudence of generally deferring judicial consideration of initiatives until after an election. *See, e.g., Futurewise v. Reed*, 161 Wn.2d 407, 411, 166 P.3d 708 (2007). Indeed, in this case the Court declined to review the Court of Appeal's

[2] The Committee cites to cases from other jurisdictions that limit the scope of post-election initiative challenges. *See, e.g.*, Committee Ans. at 17 (citing *Montanans for Equal Application of Initiative Laws v. State ex rel. Johnson*, 336 Mont. 450, 154 P.3d 1202 (2007)). But the Montana Constitution specifically provides that "The sufficiency of the initiative petition *shall not be questioned* after the election is held." 154 P.3d at 1207 (emphasis in original) (citing Mont. Const. Art. III, Sect. 4(3)). No such provision appears in the Washington Constitution. If the Committee believes Washington should adopt such a limitation, it may make that argument in their appeal brief.

summary reversal of Judge Darvas's signature sufficiency ruling without prejudice to subsequent review on the merits. Consolidation now is consistent with the courts' longstanding prudential approach to judicial review of challenged initiatives and referenda.

4. Consolidation is the appropriate procedural mechanism for efficient and consistent judicial resolution of these related issues. The Port of Seattle also opposes consolidation, and suggests that the Court instead treat the two appeals as companion cases to be heard on the same day. Port Ans. at 2. Contrary to the Port's suggestion, however, this appeal does ***not*** involve "legal issues that are separate and distinct from those present in Case No. 98732-9." *Id.* at 1. *See* discussion *supra.*

The Port also contends that that consolidation is unwarranted because of the "multiplicity of legal issues." Port. Ans. at 1. As with any complex case, however, counsel and the Court will necessarily focus their colloquy at oral argument, rather than attempting to cover all issues addressed in the briefs. The parties have already requested that the Court allow 30 minutes of argument for each side, and counsel will endeavor to respond cogently to the justices' questions in that time.

Finally, the Port's suggestion of treating the two appeals as "companion cases" is impractical. The accelerated review of the Ordinance's validity sought by the parties and allowed by the Court would

not allow time for the preparation, submission, and review of a separate round of supplemental briefs redundantly discussing the same signature sufficiency issues that will already be fully addressed by the parties' briefing in the Summary Judgment Appeal.

III. CONCLUSION

Plaintiffs request that the Court grant review, consolidate this appeal with the Summary Judgment Appeal, and maintain the briefing schedule and oral argument date set in its April 2, 2014 Order.

RESPECTFULLY SUBMITTED this 24th day of April, 2014.

Attorneys for Alaska Airlines, Inc. and Washington Restaurant Association

By s/Roger A. Leishman
Harry J. F. Korrell, WSBA #23173
Roger A. Leishman, WSBA #19971
Davis Wright Tremaine LLP
1201 Third Avenue, Suite 2200
Seattle, WA 98101-3045
(206) 622-3150 Phone
(206) 757-7700 Fax

Attorney for Filo Foods, LLC and BF Foods, LLC

By s/Cecilia Cordova
Cecilia Cordova, WSBA # 30095
Pacific Alliance Law, PLLC
601 Union St. Suite 4200
Seattle, WA 98101
(206) 652-3592 Phone
(206) 652-3207 Fax

CERTIFICATE OF SERVICE

The undersigned declares under the penalty of perjury under the laws of the State of Washington that I am now and at all times herein mentioned a citizen of the United States, a resident of the state of Washington, over the age of eighteen years, not a party to or interested in the above-entitled action, and competent to be a witness herein.

On this date I caused to be served in the manner noted below a copy of the foregoing document.

Via E-Mail and U.S. Mail:

Dmitri L. Iglitzin
Laura Ewan
Jennifer L. Robbins
Schwerin Campbell Barnard Iglitzin & Lavitt LLP
18 W. Mercer Street, Suite 400
Seattle, WA 98119-3971
iglitzin@workerlaw.com
ewan@workerlaw.com
robbins@workerlaw.com

Via E-Mail and U.S. Mail:

Wayne Douglas Tanaka
Ogden Murphy Wallace
901 5th Avenue, Suite 3500
Seattle, WA 98164-2008
wtanaka@omwlaw.com

Via E-Mail and U.S. Mail:

Mary E. Mirante Bartolo
Mark Sterling Johnsen
City of SeaTac
4800 S. 188th Street
SeaTac, WA 98188-8605
mmbartolo@ci.seatac.wa.us
mjohnsen@ci.seatac.wa.us

Via E-Mail and U.S. Mail:

Timothy George Leyh
Shane P. Cramer
Calfo Harrigan Leyh & Eakes LLP
999 3rd Avenue, Suite 4400
Seattle, WA 98104-4017
timl@calfoharrigan.com
shanec@calfoharrigan.com

Via E-Mail and U.S. Mail

Frank J. Chmelik
Seth Woolson
Chmelik Sitkin & Davis, P.S.
1500 Railroad Avenue
Bellingham, WA 98225
fchmelik@chmelik.com

Via E-Mail and U.S. Mail

Christopher Howard
Averil Rothrock
Virginia Nicholson
Schwabe Williamson & Wyatt
1420 5th Avenue, Suite 3400
Seattle, WA 98101-4010
choward@schwabe.com

Via E-Mail:

Cecilia Cordova, WSBA # 30095
Pacific Alliance Law, PLLC
601 Union St. Suite 4200
Seattle, WA 98101
cecilia@cordovalawfirm.com

Via E-Mail:

Herman L. Wacker
Alaska Airlines
P.O. Box 68900
Seattle, WA 98168-0900
Herman.Wacker@alaskaair.com

Dated this 24th day of April, 2014.

Crystal Moore

EXHIBIT A

From: Wayne D. Tanaka <wtanaka@omwlaw.com>
Sent: Thursday, October 31, 2013 2:23 PM
To: 'Dmitri Iglitzin'; Meissner, Rebecca; mmbartolo@ci.seatac.wa.us; Mark Johnsen (mjohnsen@ci.seatac.wa.us); watson.c@portseattle.org
Cc: Korrell, Harry; cecilia@cordovalawfirm.com; Ball, Taylor; Laura Ewan; Jennifer Robbins; Jennifer Woodward; Jennifer Schnarr
Subject: RE: Filo Foods vs. City of SeaTac; Case No. 13-2-25352

I believe I've confirmed that plaintiff intends to bring motions for summary judgment on their declaratory judgment/injunction claim and that the hearing on December 13 is not the trial on Part 2. I say this because I want the protection of CR 56(f) and the burdens/presumptions involved in a motion for summary judgment. I am assuming that many, if not all the issues do not involve contested facts, but if additional discovery is needed once the declarations are submitted, I do not consent to the December 13 date.

That said, and since Judge Darvis has indicated that she would accept reply briefs at least 3 days before the hearing, I would propose the following:
Initial motion November 15, responses December 4, reply December 10. The defendants get a little extra time to digest plaintiffs arguments before they respond and cast additional candle light on the issues, but otherwise no one is shorted on time.

Wayne D. Tanaka

Ogden Murphy Wallace P.L.L.C.
901 Fifth Avenue, Suite 3500
Seattle, WA 98164
phone: 206.447.7000 | fax: 206.447.0215

From: Dmitri Iglitzin [mailto:iglitzin@workerlaw.com]
Sent: Thursday, October 31, 2013 11:05 AM
To: Meissner, Rebecca; mmbartolo@ci.seatac.wa.us; Mark Johnsen (mjohnsen@ci.seatac.wa.us); Wayne D. Tanaka; watson.c@portseattle.org
Cc: Korrell, Harry; cecilia@cordovalawfirm.com; Ball, Taylor; Laura Ewan; Jennifer Robbins; Jennifer Woodward; Jennifer Schnarr
Subject: RE: Filo Foods vs. City of SeaTac; Case No. 13-2-25352

I agree that we should generally try to follow a CR 56 briefing schedule, but for the same of family harmony (mine, especially), I don't want any brief due the first working day after the Thanksgiving vacation. I therefore propose we move everything up a few workdays, so the schedule would be:

> Motions filed by Tuesday, November 12
> Oppositions filed by Wednesday, November 27
> Replies filed by Wednesday, December 4
> Hearing on Friday, December 13 @ 2:30 p.m.

Thoughts on that? It is designed to acknowledge that other people have families, too; thus, under this plan, the reply brief will ALSO not be due the first day after Thanksgiving.

Thanks

DI

Dmitri Iglitzin | Schwerin Campbell Barnard Iglitzin & Lavitt, LLP | 206.257-6003 | www.workerlaw.com

Union Representation - Strategic Organizing - Campaign Finance

From: Meissner, Rebecca [mailto:RebeccaMeissner@dwt.com]
Sent: Thursday, October 31, 2013 10:46 AM
To: Laura Ewan; Dmitri Iglitzin; mmbartolo@ci.seatac.wa.us; Mark Johnsen (mjohnsen@ci.seatac.wa.us); wtanaka@omwlaw.com; watson.c@portseattle.org
Cc: Korrell, Harry; cecilia@cordovalawfirm.com; Ball, Taylor
Subject: RE: Filo Foods vs. City of SeaTac; Case No. 13-2-25352

Based on the Court's communication setting a hearing date of December 13, Plaintiffs propose a briefing schedule per Civil Rule 56. The schedule would be as follows:

Motions filed by Friday, November 15
Oppositions filed by Monday, December 2
Replies filed by Monday, December 9
Hearing on Friday, December 13 @ 2:30 p.m.

Please let me know if the City and Committee agree with this proposed schedule.

Regards,
Rebecca

Rebecca Meissner | Davis Wright Tremaine LLP
1201 Third Avenue, Suite 2200 | Seattle, WA 98101
Tel: (206) 757-8195 | Fax: (206) 757-7195
Email: rebeccameissner@dwt.com | Website: www.dwt.com

Anchorage | Bellevue | Los Angeles | New York | Portland | San Francisco | Seattle | Shanghai | Washington, D.C.

From: Court, Darvas [mailto:Darvas.Court@kingcounty.gov]
Sent: Wednesday, October 30, 2013 9:24 AM
To: Meissner, Rebecca
Cc: Korrell, Harry; Laura Ewan (ewan@workerlaw.com); Dmitri Iglitzin (iglitzin@workerlaw.com) (iglitzin@workerlaw.com); cecilia@cordovalawfirm.com; mmbartolo@ci.seatac.wa.us; Mark Johnsen (mjohnsen@ci.seatac.wa.us); wtanaka@omwlaw.com; watson.c@portseattle.org
Subject: RE: Filo Foods vs. City of SeaTac; Case No. 13-2-25352

Good morning,

Plaintiff's Motion for Declaratory Judgment will be scheduled for Friday, December 13 at 2:30. Parties can work out a briefing schedule so rely briefs are in at least 3 court days before the hearing date. If parties are unable to come to an agreement, Judge Darvas will set one. The Court has no objection to two separate motions, one on the state law claims and one on the federal law claims, but each should comply with the brief page limits.

Respectfully,

Jacqueline A. Ware, bailiff for
Judge Andrea Darvas, 4H
206-477-1465
Darvas.Court@kingcounty.gov
Check civil case standby status:
www.kingcounty.gov/courts/superior court/calendars

From: Meissner, Rebecca [mailto:RebeccaMeissner@dwt.com]
Sent: Tuesday, October 29, 2013 12:41 PM
To: Court, Darvas
Cc: Korrell, Harry; Laura Ewan (ewan@workerlaw.com); Dmitri Iglitzin (iglitzin@workerlaw.com) (iglitzin@workerlaw.com); cecilia@cordovalawfirm.com; mmbartolo@ci.seatac.wa.us; Mark Johnsen (mjohnsen@ci.seatac.wa.us); wtanaka@omwlaw.com; watson.c@portseattle.org
Subject: Filo Foods vs. City of SeaTac; Case No. 13-2-25352

Ms. Ware,

Following up on our telephone call today inquiring about a status conference, on behalf of the Plaintiffs in the above-referenced matter, we expect to file a motion for declaratory judgment as articulated in our Amended Complaint *if* the SeaTac ordinance passes. Because of the nature and complexity of this case, and the short time between the election and the effective date of the proposed ordinance, we are seeking guidance from the Court on the following items:

- We would like to reserve a hearing date that will provide Judge Darvas sufficient time to consider the issues but also rule before the measure's January 1, 2014 effective date. We respectfully request a hearing date in mid-December. If a hearing date is set in December, would Judge Darvas like to set a briefing schedule that differs from CR 56 to allow for more time to consider the papers after briefing is concluded?

- As you will see from the Amended Complaint, there are a number of state and federal law claims. If the state law claims are resolved in Plaintiffs' favor, the Court may not need to reach the federal law claims. Given the timing constraints, filing a motion limited to the state law claims first (and then filing a motion on federal claims if necessary later) is not viable option. We would like the Court's direction on whether it is acceptable for Plaintiffs to file two motions for declaratory judgment: one on the state law claims and another on the federal law claims or would the Court prefer that Plaintiffs combine all the issues in a single motion (in that event, Plaintiffs would seek leave to file an over-length brief, given the number and complexity of the issues).

We are happy to participate in a status conference with the judge and parties (copied here) to discuss these issues. Thank you.

Regards,

Rebecca Meissner | Davis Wright Tremaine LLP
1201 Third Avenue, Suite 2200 | Seattle, WA 98101
Tel: (206) 757-8195 | Fax: (206) 757-7195
Email: rebeccameissner@dwt.com | Website: www.dwt.com

Anchorage | Bellevue | Los Angeles | New York | Portland | San Francisco | Seattle | Shanghai | Washington, D.C.

EXHIBIT B

RONALD R. CARPENTER
SUPREME COURT CLERK

SUSAN L. CARLSON
DEPUTY CLERK / CHIEF STAFF ATTORNEY

THE SUPREME COURT
STATE OF WASHINGTON

TEMPLE OF JUSTICE
P.O. BOX 40929
OLYMPIA, WA 98504-0929

(360) 357-2077
e-mail: supreme@courts.wa.gov
www.courts.wa.gov

January 2, 2014

LETTER SENT BY E-MAIL

Dmitri L. Iglitzin
Jennifer L. Robbins
Schwerin Campbell Barnard Iglitzin & Lavitt LLP
18 W. Mercer Street, Suite 400
Seattle, WA 98119-3971

Wayne Douglas Tanaka
Ogden Murphy Wallace
901 5th Avenue, Suite 3500
Seattle, WA 98164-2008

Mary E. Mirante Bartolo
Mark Sterling Johnsen
City of SeaTac
4800 S. 188th Street
SeaTac, WA 98188-8605

Timothy George Leyh
Shane P. Cramer
Calfo Harrigan Leyh & Eakes LLP
999 3rd Avenue, Suite 4400
Seattle, WA 98104-4017

Cecilia Ann Cordova
Pacific Alliance Law, PLLC
601 Union Street, Suite 4200
Seattle, WA 98101-4036

Harry J.F. Korrell, III
Rebecca Olson Meissner
Taylor S. Ball
Davis Wright Tremaine LLP
1201 3rd Avenue, Suite 2200
Seattle, WA 98101-3045

Herman L. Wacker
Alaska Airlines
P.O. Box 68900
Seattle, WA 98168-0900

Hon. Barbara Miner, Clerk **(sent by U.S. mail only)**
Maleng Justice Center
401 4th Avenue N, Room 2C
Kent, WA 98032

Re: Supreme Court No. 89723-9 - Filo Foods, et al. v. City of SeaTac, et al.
King County Superior Court No. 13-2-25352-6 KNT

Clerk and Counsel:

A copy of the Defendants' "NOTICE OF APPEAL/DISCRETIONARY REVIEW TO THE WASHINGTON STATE SUPREME COURT" was forwarded to this Court by the superior court clerk and received on January 13, 2014. The filing will be treated as a cross review pursuant to RAP 5.1(d). As such, no filing fee is required. The Defendants may contact the King County Clerk's Office for refund of the filing fee. See RAP 5.1(b).

Comments on the issue whether this matter should be designated as a notice of appeal were received from the Plaintiffs, the Intervenor, and the Defendants. Counsel's comments were

very helpful in understanding the status of the case. It appears from my review that the superior court's order resolved the remaining claims in the case. Therefore, this matter has been designated as a notice of appeal. (Accordingly, the Defendants notice has been treated as a notice of appeal.)

Because the first notice was filed by the Intervenor, the Intervenor will be considered the "Appellant" in this case. The Defendants will be considered the Respondents.

The following schedule sets forth the time requirements for completing the record on review and the filing of briefs pursuant to the Rules of Appellate Procedure (RAP):

1. STATEMENT OF GROUNDS FOR DIRECT REVIEW:
Within 15 days after filing the notice of appeal, the Appellant must serve on all other parties and file with the Clerk of this Court a statement of grounds for direct review. A Respondent may file an answer to the statement of grounds for direct review, which must be filed with the Clerk of this Court within 14 days of service of the statement on the Respondent. RAP 4.2.

2. DESIGNATION OF CLERK'S PAPERS:
Within 30 days after the date of this letter, the Appellant must serve on all other parties and file with the trial court clerk and with the Clerk of this Court a designation of those Clerk's papers and exhibits the party wants the trial clerk to transmit to this Court. Any party may supplement the designation of clerk's papers and exhibits prior to or with the filing of the party's last brief. RAP 9.6.

3. STATEMENT OF ARRANGEMENTS FOR VERBATIM REPORT OF PROCEEDINGS:
If the Appellant intends to provide a verbatim report of the proceedings, then within 30 days after the date of this letter, the Appellant must serve and file with the Clerk of this Court a statement that arrangements have been made for the transcription of the report. The Appellant must indicate the date the transcription was ordered and the financial arrangements that have been made for payment of transcription costs. RAP 9.2. If the Appellant arranges for only a partial report of proceedings, then the Appellant must comply with the additional requirements of RAP 9.2(c). If the Appellant does not intend to provide a verbatim report of proceedings, a statement to that effect should be served and filed in lieu of a statement of arrangements within 30 days after the date of this letter. See RAP 9.2(a).

4. APPELLANT'S BRIEF (if no report of proceedings filed):
NOTE: IF THE RECORD OF REVIEW DOES NOT INCLUDE A REPORT OF PROCEEDINGS (as defined by RAP 9.2, RAP 9.3 and RAP 9.4), then the Appellant shall file an opening brief with the Clerk of this Court within 45 days after filing the designation of Clerk's papers and exhibits. At the same time the

Appellant shall serve one copy of the brief on every other party and on any amicus curiae and file with the Clerk of this Court proof of service. RAP 10.2.

5. FILING OF REPORT OF PROCEEDINGS:
Any report of proceedings must be filed with the clerk of the trial court within 60 days after the statement of arrangements is filed. RAP 9.5(a). At the same time the Appellant must serve notice of the filing of the report of proceedings and file proof of the service on all parties. RAP 9.5(a). As to when, where and how a party may serve and file objection to, and proposed amendments to, a narrative report of proceedings or a verbatim report of proceeding, see RAP 9.5(c).

6. APPELLANT'S BRIEF (if a report of proceedings is filed):
Within 45 days after the report of proceedings is filed, the Appellant shall file an opening brief with the Clerk of this Court. At the same time the Appellant shall serve one copy of the brief on every other party and on any amicus curiae, and file with this Court proof of service. RAP 10.2.

7. RESPONDENT/CROSS APPELLANTS' BRIEF:
Within 30 days after service of Appellant's brief, the Respondents shall file a response brief with the Clerk of this Court. The brief should include any assignments of error and issues raised on cross-appeal and include argument as to the same, see RAP 10.3(b). At the same time the Respondents shall serve one copy of the brief on every other party and on any amicus curiae, and file with this Court proof of service. RAP 10.2.

8. APPELLANT'S REPLY BRIEF:
Appellant's reply brief shall be filed with the Clerk of this Court within 30 days after service of the brief of the Respondent. At the same time the Appellant shall serve one copy of the brief on every other party and on any amicus curiae, and file with the Clerk of this Court proof of service. RAP 10.2.

9. RESPONDENTS' (CROSS APPELLANTS') REPLY BRIEF:
Respondents' reply brief as permitted by RAP 10.1(c) and RAP 10.1(f) shall be filed with the Clerk of this Court within 30 days after service of Appellant's reply brief. At the same time the Respondents shall serve one copy of the brief on every other party and on any amicus curiae, and file with the Clerk of this Court proof of service. RAP 10.2.

It is noted that in the Rules of Appellate Procedure "should" is used when referring to an act a party or counsel is under an obligation to perform. Accordingly, the failure to comply with the above specified time requirements and/or procedures for completing the record on review and the service and filing of briefs, may subject the offending party to the sanctions pursuant to

RAP 18.9. A request for an extension of time must be made by motion pursuant to the provisions of RAP Title 17.

All briefs and other papers submitted to the Supreme Court to be filed or considered in a case should be addressed to the Clerk of the Court and should clearly show the information required by RAP 18.23 and APR 13(a).

Counsel are referred to the provisions of General Rule 31(e) in regards to the requirement to omit certain personal identifiers from all documents filed in this court. This rule provides that parties "shall not include, and if present shall redact" social security numbers, financial account numbers and driver's license numbers. As indicated in the rule, the responsibility for redacting the personal identifiers rests solely with counsel and the parties. The Clerk's Office does not review documents for compliance with the rule. Because briefs and other documents in cases that are not sealed may be made available to the public on the court's internet website, or viewed in our office, it is imperative that such personal identifiers not be included in filed documents.

Any request for reasonable attorney fees must be made pursuant to RAP 18.1.

At the appropriate time, usually sometime after the Appellant's reply brief has been filed, a decision will be made by the Court as to whether or not direct review will be accepted; see RAP 4.2.

Counsel are advised that future correspondence from this Court regarding this matter will most likely only be sent by an e-mail attachment, not by regular mail. This office uses the e-mail address that appears on the Washington State Bar Association lawyer directory. Counsel are responsible for maintaining a current business-related e-mail address in that directory.

Sincerely,

Susan L. Carlson
Supreme Court Deputy Clerk

SLC:mt

OFFICE RECEPTIONIST, CLERK

From: OFFICE RECEPTIONIST, CLERK
Sent: Thursday, April 24, 2014 3:14 PM
To: 'Moore, Crystal'
Cc: Korrell, Harry; Leishman, Roger; SEA Docket; iglitzin@workerlaw.com; ewan@workerlaw.com; robbins@workerlaw.com; wtanaka@omwlaw.com; mmbartolo@ci.seatac.wa.us; mjohnsen@ci.seatac.wa.us; timl@calfoharrigan.com; shanec@calfoharrigan.com; fchmelik@chmelik.com; choward@schwabe.com; Meissner, Rebecca; Sinnott, Margaret; Alexander, Donna; Ball, Taylor; cecilia@cordovalawfirm.com; Herman Wacker
Subject: RE: Filo Foods et al v. The City of SeaTac; SC No. 90113-9

Rec'd 4-24-14

Please note that any pleading filed as an attachment to e-mail will be treated as the original. Therefore, if a filing is by e-mail attachment, it is not necessary to mail to the court the original of the document.

From: Moore, Crystal [mailto:CrystalMoore@dwt.com]
Sent: Thursday, April 24, 2014 3:11 PM
To: OFFICE RECEPTIONIST, CLERK
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Subject: Filo Foods et al v. The City of SeaTac; SC No. 90113-9

Dear Clerk:

Attached for filing please find Plaintiffs' Reply in Support of Motion for Consolidation.

Thank you.

Sent on behalf of:
Roger Leishman, WSBA#19971
RogerLeishman@dwt.com
206-757-8083

Crystal Moore | Davis Wright Tremaine LLP
Legal Secretary to Roger Leishman, Dan Davies, and Candice Tewell
1201 Third Avenue, Suite 2200 | Seattle, WA 98101
Tel: (206) 757-8724 | Fax: (206) 757-7700
Email: crystalmoore@dwt.com | Website: www.dwt.com
Anchorage | Bellevue | Los Angeles | New York | Portland | San Francisco | Seattle | Shanghai | Washington, D.C.