NO. 90282-8

SUPREME COURT OF THE STATE OF WASHINGTON

MICHAEL FARROW and LIDIA FARROW,

Respondents,

v.

FLOWSERVE US INC.,
solely as successor to EDWARD VALVES, INC.,

Petitioner.

Court of Appeals No. 69917-2-I

RESPONDENTS' ANSWER TO PETITION FOR REVIEW

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I. INTRODUCTION

Flowserve's petition does not challenge the Court of Appeal holding on primary legal issue before it. The Court of Appeals correctly held that:

> Extensive, uniform federal authority interpreting ER 804(b)(1) exists without conflicting precedent in any federal or Washington appellate court. Recognizing that this persuasive authority is extensive and uniform and exists without conflicting precedent in Washington, we adhere to the federal court interpretation of the predecessor in interest language of ER 804(b)(1).

Slip Op., p. 13.

The portions of the Court of Appeals' opinion and Order On Reconsideration that Flowserve does challenge relate to specific facts in the record and legal authority, almost none of which are discussed by Flowserve in its petition. Plaintiffs' Response To Respondents' Motion For Reconsideration at pages 1-15 ("Response To Reconsideration"),[1] extensively discusses both the factual record and legal authority establishing the foundation for Mr. Wortman's testimony.. Pages 15-18 of that same response explain why RAP 9.12 also procedurally bars Flowserve's argument challenging the same foundation for Mr. Wortman's testimony. Flowserve's petition ignores that issue. Pages 11-

[1] A copy is attached to this Response as Appendix A.

14 of the Reply Brief of Plaintiff[2] as well as pages 13-15 of the Slip Opinion explain why certain defendants in the Wortman deposition in *Nelson* "had an opportunity and similar motive to Flowserve to develop Wortman's deposition testimony." Slip Op., p. 15. Finally, both pages 18-20 of Plaintiffs' Response to Reconsideration and pages 15-17 of the Slip Opinion explain why Wortman's deposition testimony, considered together with Mr. Tucker's and Mr. Farrow's testimony, creates "genuine issues of material facts." *Id.* at 15.

Far from being inconsistent with *Braaten v. Saberhagen Holdings*, 165 Wn.2d 373, 198 P.3d 493 (2008) and *Simonetta v. Viad Corp.*, 165 Wn.2d 341, 197 P.3d 127 (2008) as defendant argues, here the Court of Appeals opinion first correctly resolved evidentiary issues not even mentioned in those two opinions. The Court of Appeals then (in a portion of the opinion, it did not consider precedential), properly applied those two cases and other Washington cases[3] to the facts of this case. In short, defendant's emphasis on *Simonetta* and *Braaten*, does not impact the analysis the Court of Appeals applied to this case.

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[2] A copy is attached to this Response as Appendix B.

[3] *Lockwood v. AC&S*, 109 Wn.2d. 235, 744 P.2d 605 (1987); *Allen v. Asbestos Corp., Ltd.*, 138 Wn. App. 564, 157 P.3d 406 (2007); *Berry v. Crown Cork & Seal Co., Inc.*, 103 Wn. App. 312, 14 P.3d 789 (2000); *Morgan v. Aurora Pump Co.*, 159 Wn. App. 724, 248 P.3d 1052 (2011); and *Montaney v. J-M Mfg. Co.*, Inc., 314 P.3d 1144 (2013).

II. RESPONDENTS' STATEMENT OF ISSUES PRESENTED FOR REVIEW

Flowserve's "Issues Presented For Review" in its Petition are extraordinarily one-sided. A fairer statement of issues is as follows:

1. Under ER 602 and 701 and the facts of this case, did Mr. Wortman have foundation to testify about Puget Sound Naval Shipyard's ("PSNS") "standard operating procedure" for acquiring replacement parts for valves and pumps being repaired at PSNS between the mid- to late-1960s and the mid-1970s?

2. Did the Court of Appeals err under the facts of this case by concluding that Mr. Wortman had sufficient foundation concerning matters about which he actually testified?

3. Did the Court of Appeals err under the facts of this case in holding that Mr. Wortman's deposition testimony did not constitute hearsay pursuant to the predecessor-in-interest exception of ER 804(b)(1).

4. Did the Court of Appeal's resolution of evidentiary issues and reversal of summary judgment based on same conflict with the holdings in *Braaten* and *Simonetta*?

III. ARGUMENT

A. Mr. Wortman's Testimony Satisfied The Requirements of ER 602 and 701

The record in this appeal plainly demonstrates that Mr. Wortman had personal knowledge sufficient to support his testimony. Defendant's statement of facts about this issue is woefully inadequate. Further, defendant's argument to the contrary -- at pages 14-16 of its Petition -- is mistaken. This Court has held that, under ER 602, "testimony should be excluded only if, as a matter of law, no trier of fact could reasonably find that the witness had firsthand knowledge." *State v. Vaughn*, 101 Wn.2d 604, 611-12, 682 P.2d 878 (1984), *citing* 5 Karl Tegland, Wash. Prac. § 219 (2d ed. 1982) (emphasis added). *See also Herring v. DSHS*, 81 Wn. App. 1, 22, 914 P.2d 67 (1996). The foundation for Mr. Wortman's testimony easily satisfies this minimal threshold.

Via two fundamental ways, Mr. Wortman's declaration and deposition demonstrate facts from which a trier of fact could reasonably find that Mr. Wortman had firsthand knowledge in support of his testimony. The first way is triggered through his direct visual observations. For example, Mr. Wortman explained that his testimony was "based on my observations of the replacement parts we received when we were doing work on equipment as part of an overhaul, conversion or a modernization of a ship." CP 600. Similarly, in deposition, Mr. Wortman

testified that he toured the machine shop every day and that he frequently observed packaging from the original manufacturers in connection with replacement parts. CP 222. Such testimony satisfies the "garden variety" definition of personal observations.

Secondly, Mr. Wortman's testimony was also properly based on what he observed and learned from his firsthand experience at PSNS – experience that spanned more than 35 years of employment at PSNS. For example, during the period at issue, the late 1960's through the mid-1970s, Mr. Wortman was the head of the machine shop at PSNS. As the head of the machine shop, he was in charge of repairs on all machinery brought into the shop for ships worked on at PSNS. Part of his supervisory role at the shipyard was to ensure the timely installation of replacement parts for valves and other equipment at PSNS. This supervisory roles is significant: Mr. Wortman utilized his personal experience and responsibilities at PSNS as part of his foundation for testifying, *e.g.,* Mr. Wortman testified that replacement parts for such shipboard equipment were ordered from the original manufacturer because "[e]xperience had proved that obtaining the parts from the original manufacturer had the best chance of good quality and timeliness in providing the parts." CP 215-216. A trier of fact could reasonably find that Mr. Wortman had "firsthand knowledge" that the

replacement parts obtained 'from the original manufactures had the best chance' ... timeliness in providing the parts." *Id.*[4]

Mr. Wortman not only worked with and supervised various types of workers at PSNS, but testified that he worked closely with the supervisor of the pipefitter shop (Shop 56) where Mr. Farrow and his co-workers were employed. CP 450. As a supervisor, Mr. Wortman was also personally familiar with and responsible for effectuating the following changes in approach:

> Q. So by the time you became a superintendent, where was the Navy in that process of revamping quality control as a result of the loss of the submarines?
>
> ....
>
> THE WITNESS: The Navy and we at Puget were – by the time I became superintendent were deeply involved in increasing our quality control.....
>
> Q. And did that quality control initiative have any effect on how machinery was repaired in the machine shop?
>
> A. Yes.
>
> ....
>
> Q. Okay. And did that – did that have any effect on the ordering of replacement parts?

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[4] Mr. Wortman's testimony is analogous to the testimony of witnesses whose admissibility was affirmed by the Court of Appeals in *Herring*. In *Herring*, 81 Wn. App. at 21-22, the court rejected arguments that people who worked with Mr. Herring or "were dependent upon Herring for information" were not sufficiently familiar with his work to testify about his work from personal knowledge. Here, part of Mr. Wortman's job involved making sure that the proper replacement parts were delivered in a timely manner. As such, Mr. Wortman's testimony involved comparing the timing of the delivery of replacement parts obtained from the equipment manufactures with the timing of delivery of replacement parts obtained from other sources and that he made those comparisons. He was in a position to make those comparisons and determinations in much the same way as were the witnesses in *Herring*.

....

A. As I believe I stated before, the increased quality control measures required the Navy to be more careful in purchasing the repair parts, and that at that time there was a great increase in going to the original vendor for repair parts.

....

Q. How did that – how did that relate to quality control?

....

THE WITNESS: By experience, we in the shop and in the planning end found that if the items were purchased from the original manufacturer, in general, the quality met the specs and the timeliness of delivery improved.

CP 221-222 (emphasis added).

Plaintiff points out that, importantly, defendant not only fails to discuss most of this evidence, but also has no response to plaintiffs' discussion at pages 9-11 of the Response to Reconsideration, which cites numerous cases, including *Agfa-Gevaert, A.G. v. A.B. Dick Co.*, 879 F.2d 1518 (7th Cir. 1989), *Navel Orange Administrative Committee v. Exeter Orange Co., Inc.*, 722 F.2d 449 (9th Cir. 1983), and *Stuart v. UNUM Life Ins. Co. of America*, 217 F.3d 1145 (9th Cir. 2000), supporting plaintiffs' position on this issue.

Pursuant to ER 602 and 701, a witness such as Mr. Wortman may also properly testify to inferences and opinions rationally based on perception and helpful to a determination of a fact in dispute. *In Re Estate of Black,* 153 Wn.2d 152, 167, 102 P.3d 796 (2004). In *State v. Smith*, 87

Wn. App. 345, 351, 941 P.2d 725 (1997), the Court of Appeals explained ER 602 by holding that:

> Stated negatively, the rule bars testimony purportedly relating facts, when they are based only on the reports of others. (Emphasis added; footnote omitted.)

The Court of Appeals went on to hold that:

> When the witness testifies to facts that he knows partly at first hand and partly from reports, the judge, it seems, should admit or exclude according to the reasonable reliability of the evidence.

Id. at 351-52 (footnotes omitted).

In *Smith*, the Court of Appeals rejected the evidence under this standard because the "only basis from which we can infer that he knew the distance was a report from someone else." *Id.* at 352 (emphasis added). The limited factual record of foundational basis for testimony in *Smith* falls far short of the foundation basis for testimony here; they are nowhere near each other. Moreover, the trial judge in this case --at RP July 27, 2012, p. 46 found Mr. Wortman to have had sufficient personal knowledge for purposes of ER 602. Other trial courts have done the same. For example, the trial court in *Morgan v. Aurora Pump Co.*, 159 Wn. App. 724, 736, 248 P.3d 1052 (2011), also admitted this very evidence from Mr. Wortman.

Defendant further argues that whether Mr. Wortman worked for the Navy supply system is of some consequence. Defendant's argument follows that

> [W]hile Mr. Wortman said that 'it was the Navy's standard operating procedure to procure the gaskets and packing from the equipment manufacturers via the Navy' supply system; CP 600-601, the record shows that Mr. Wortman had no personal knowledge of that system.

Pet., pp. 5, 14-15. Defendant's argument misses the mark in two respects. First, defendant ignores all of the evidence discussed above. Second, defendant's argument proffers a barrier to testimony that does not exist: under defendant's argument a witness would be prohibited from testifying about what packages he or she received from a package delivery company unless he had worked for the package delivery company even though he or she testifies to commonly receiving and observing packages that identified the sender and the package delivery company. Simply put, there is no support for Defendant's argument.

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B. The Court of Appeals Correctly Concluded That Certain Defendants Present At Wortman's Deposition Had An Opportunity And A Similar Motive To Flowserve To Develop Wortman's Deposition Testimony

1. Defendant Never Properly Explained To The Trial Court Why Its Motives To Examine Mr. Wortman Were Different Than Those Of Crane Co. And The Other Defendants Present At The Wortman Deposition In *Nelson*

The Court of Appeals (at page 13 of its Slip Opinion) adopted the rulings of several federal appeals courts, all of which have established what a party seeking to oppose the admission of evidence pursuant to Section 804(b)(1), must do to inform the court about how its claimed predecessor's motives differed from the party's motives:

> When opposing admission of evidence pursuant to ER 804(b)(1), must "explain as clearly as possible ... why the motive and opportunity of the defendants in the first case was not adequate to develop the cross-examination which the instant defendant would have presented to the witness." *Dykes v. Raymark Indus., Inc.*, 801 F.2d 810, 817 (6th Cir. 1986); *O'Banion*, 968 F.2d at 1015 n.4. In *United States v. DiNapoli*, 8 F.3d 909 (2d Cir. 1993), the court was not persuaded "by the Government's contention that the absence of similar motive is conclusively demonstrated by the availability at the grand jury of some cross-examination opportunities that were forgone." *DiNapoli*, 8 F.3d at 914. In explaining why it was not persuaded, the court noted that, "[i]n virtually all subsequent proceedings, examiners will be able to suggest lines of questioning that were not pursued at a prior proceeding." *DiNapoli*, 8 F.3d at 914. (Emphasis added.) [5]

[5] The Fourth Circuit adopted this requirement as well in *Horne v. Owens-Corning Fiberglas Corp.*, 4 F.3d 276 (4th Cir. 1993) *and Supermarket of Marlinton, Inc. v. Meadow Gold Dairies, Inc.*, 71 F.3d 119 (4th Cir. 1995).

Flowserve does not dispute that the Court of Appeals correctly stated the law.

Ample sound and established authority from the Ninth and D.C. Circuits[6] also upheld plaintiffs' position that a motive to discredit a witness testifying about a crucial part of the witness's testimony properly serves as a "similar motive." *See* Opening Brief, pp. 24-25 arguing that both Flowserve's goals and the defendants in *Nelson* goals would have been the same – to discredit Mr. Wortman's testimony regarding obtaining replacement parts from the original manufacturers. Petitioner Flowserve also does not dispute the proper application of these cases here, nor does Flowserve even contend that those cases are distinguishable from the matter here.

2. The Court Of Appeals Correctly Applied That Law To The Facts Of Record

The Court of Appeals explained at Slip Op., page 14:

> During the *second* summary judgment hearing, attorney Aliment asserted that he would not have asked additional product identification questions, but that competent counsel should have asked additional questions about Wortman's testimony related to obtaining replacement parts from the original manufacturers. (Emphasis added.)

The Court of Appeals then rejected defendant's arguments, stating:

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[6] *United States v. McFall, 558 F.3d 951 (9th Cir. 2009)* and *United States v. Miller*, 904 F.2d 65 (D.C. Cir. 1990).

> All of the manufacturers were interested in discrediting Wortman's testimony, which supported Farrow's position that if he worked with or around valves at PSNS that were being repaired or replaced during a period of years in the 1960s and 1970s, he would likely have been exposed to new and replacement asbestos-containing insulation, gaskets, and packing supplies to the PSNS by the manufacturers during that time period. Furthermore, although each manufacturer may have hoped to spread liability to as many parties as possible if their respective defenses failed, that fact would not extinguish the shared motive of discrediting Wortman's testimony so that no manufacturer would be held liable.

Id. (emphasis added).

Defendant's attempt to argue against this analysis ignores the record and misstates or misunderstands the import of Mr. Wortman's testimony. The record already establishes that Mr. Wortman was not familiar with "Edward Valves." CP 205. As such, unless the question somehow were to jog Mr. Wortman's memory, any specific question about Edward Valves was likely to be met with a similar answer of lack of familiarity. Flowserve also flatly asserted that their counsel "would not have asked additional product identification questions" for fear of jogging Mr. Wortman's memory. RP January 7, 2013 (transcript pages 4-9). Since no questions specific to Edward Valves would have been asked, the only relevant issue involving similarity of motive would have been to "Wortman's testimony relating to obtaining replacement parts from the original manufacturers." Slip Op., p. 14.

That portion of Wortman's testimony was not product specific. Rather, it and the extensive corresponding cross-examination, turned on such matters as Mr. Wortman's recollection of observing that the packaging of replacement parts was from the original manufacturer and the Navy and PSNS's new policy of obtaining such replacement parts, including gaskets and packing, from the original manufacturer of the valves.[7] Flowserve has mischaracterized Mr. Wortman's testimony as being "that the Navy purchased replacement parts from some equipment manufacturer" (Pet., p. 18), but Mr. Wortman's actual testimony stands as follows: "it was the standard operating procedure to purchase the gaskets and packing from the equipment manufacturer via the Navy supply system." CP 599-600. A "standard operating procedure" is "established or prescribed method to be followed routinely for the performance of designated operation or in designated situations. – called also *standing operating procedure*" (emphasis added), and, thus, is a method that "is applied routinely." *See* discussion, *infra*, citing WEBSTER'S NEW TWENTIETH DICTIONARY (2d Ed), page 1149. The standard operating procedure issues the issues about which Flowserve's counsel said that competent counsel should have further inquired about, and which are

[7] Mr. Wortman's testimony appears in several pages in the Clerk's Papers. CP 202-225 includes more than 70 deposition pages. CP 393-423 contains some partially overlapping pages as do CP 440-485.

precisely the issues where the Court of Appeals correctly found that Flowserve had similarity of motive. That Flowserve chose not to ask further questions, whether for strategic reasons or otherwise, does not change the fact that they had the motive and opportunity to do so, but passed. Regardless, there is no such that as an ineffective assistance of counsel argument in civil litigation.

C. The Court of Appeals' Decision Is Completely Consistent With *Braaten* and *Simonetta*.

Defendant acknowledges that this Court's decisions in *Braaten* and *Simonetta* hold that liability for product-related injuries can properly be assigned to entities that sell or market the product.[8] Evidence that would allow a trier of fact to infer that Flowserve sold asbestos-containing

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[8] Defendant's Petition at pages 11-12 states:

> As explained in *Braaten* and *Simonetta*, the public policies underlying product liability law do not justify shifting the costs of accidental injury onto these parties. A seller:
>
> > by marketing his product for use and consumption, has undertaken and assumed a special responsibility toward any member of the consuming public who may be injured by it; that the public has the right to and does expect, in the case of products which it needs and for which it is forced to rely upon the seller, that reputable sellers will stand behind their goods; that public policy demands that the burden of accidentally injuries caused by products intended for consumption be placed upon those who market them, and be treated as a cost of production against which liability insurance can be obtained; and that the consumer of such products is entitled to the maximum of protection at the hands of someone, and the proper persons to afford it are those who market the products. *Simonetta*, 165 Wn.2d 341, 363 n. 8 (citing Restatement (Second) of Torts § 401A cmt. c). ... While consumers are entitled to protection from unsafe products, they have no right to demand that the cost of that protection be shifted to anyone other than those who placed the products into commerce. (Emphasis added.)

products to which Mr. Farrow was exposed is thus completely consistent with *Braaten* and *Simonetta.* Nothing in *Braaten* and *Simonetta* even addressed t evidentiary principles applied by multiple federal court cases in asbestos as well as other cases, or came close to suggesting that such principles should not be used in cases like this one.

Defendant argues that Mr. Wortman's testimony would not suffice under *Braaten* and *Simonetta* because plaintiff:

> [M]ust show that Edward, specifically, supplied asbestos-containing replacement parts to the Navy and Mr. Farrow was exposed to those parts. *Braaten*, 165 Wn.2d at 396, 198 P.3d 493 ("the plaintiff must identify the particular manufacturer of the product that caused the injury"). Mr. Wortman admitted that had never heard of Edward. CP 205. It follows that he cannot possibly know whether Edward sold gaskets, packing, or anything else to the Navy. *See, e.g., Overton v. Consolidated Ins. Co.*, 145 Wn.2d 417, 430, 38 P.3d 322 (2002).

Pet., pp. 16-17. Those arguments ignore the definition of "standard operating procedure," and ignore the law concerning circumstantial evidence.[9] WEBSTER'S NEW TWENTIETH DICTIONARY (2d Ed), page 1149 defines:

> "Standard operating procedure" as "established or prescribed method to be followed routinely for the performance of designated operation or in designated situations – called also *standing operating procedure.*" (Emphasis added.)

[9] *Overton v. Consolidated Ins. Co.*, 145 Wn.2d 417, 430, 38 P.3d 322 (2002) is inapplicable to this case because neither the facts nor the opinion dealt with a "standard operating procedure."

The trier of fact can properly use circumstantial evidence which, as stated at WPI 1.03, refers:

> [T]o evidence from which, based on your common sense and experience, you may reasonably infer something that is at issue in this case.
>
> The law does not distinguish between direct and circumstantial evidence in terms of their weight or value in finding the facts in this case. One is not necessarily more or less valuable than the other.

It is reasonable to infer that an organization's standard operating procedure was utilized by that organization in an individual instance even in the absence of direct evidence that it was utilized on any specific or particular occasion. Such is the very nature of circumstantial evidence. For example in *International Broth. of Teamsters v. United States,* 431 U.S. 324, 336, 97 S.Ct. 1843 (1977), the United States Supreme Court equated a pattern or practice with a "standard operating procedure", *i.e.*, to show a pattern or practice the plaintiff had to show "that racial discrimination was the company's standard operating procedure the regular rather than the unusual practice." While that inference may be rebutted, it nevertheless remains as evidence. *See Teamsters* at 361, where the court states:

> If an employer fails to rebut the inference that arises from the Government's prima facie case, a trial court may then conclude that a violation has occurred and determine the appropriate remedy. Without any further evidence from the Government, a court's finding of a pattern or practice justifies an award of prospective relief.

D. This Opinion Is Consistent With *Braaten* and *Simonetta* And The Record Supports Neither Flowserve's Conspiracy Theory At Pages 12-13 Or Its Apocalyptic Predictions About The Plaintiffs' Bar Nor Its Apocalyptic Predictions At Page 20

In a further and extraordinary reach to try attempt to convince this Court that this case breaks new ground, Flowserve's first argues that this case is part of a conspiracy by the "plaintiff's bar" and points to counsel in the Garlock Sealing Technologies bankruptcy by alleging that they

> .... 'changed their story and began arguing that it was actually the metal equipment – and not the stem packing manufacturers – who supplies asbestos containing replacement parts to the Navy.'

Pet., p. 12. No CP cites support Flowserve's assertion about this case's connection to a national conspiracy. To the contrary, Flowserve "managing agent admitted at CP 151-154 that Flowserve supplied and marketed asbestos-containing replacement packing and other replacement parts.[10]

Similarly, both Flowserve's argument that "**Mr. Wortman's testimony does not support an inference that Mr. Farrow was exposed to asbestos that Edward placed in the stream of commence**" (Pet., p. 19), and its apocalyptic predictions at page 20 that Mr. Wortman's testimony will be a "universal and permanent bar against any

[10] Nor is it clear how the Garlock bankruptcy (which according to *In re Garlock Sealing Technologies, LLC,* 504 B.R. 71, 73 (Bankr. W.D.N.C. 2014) was not filed until June 2010) could have led Mr. Wortman to testify as he did in March and April 2009 unless he was part of the conspiracy and the conspirators knew the future.

manufacturers' motion for summary judgment in any asbestos lawsuit with Navy exposure," [11] are refuted by the Court of Appeals actual analysis, *e.g.*,

> As in *Montaney*, Farrow presented evidence that (1) he worked on and around Edward valves that created asbestos dust, which he breathed during the several decades in which he worked as a pipefitter and in the design shop at the PSNS; (2) he worked on or around Edward valves many times; and (3) EVI placed into the stream of commerce asbestos-containing products used at the PSNS. Although Tucker, EVI's CR 30(b)(6) witness, testified that EVI never manufactured, distributed, or sold any external insulation or flange gaskets, he admitted that EVI sold original and replacement packing. This evidence that EVI sold original and replacement packing—coupled with Farrow's testimony that he removed and replaced packing from Edward valves, and Wortman's testimony that the majority of replacement parts at the PSNS in later years were procured from the original manufacturer—could allow a trier of fact to reasonably infer that EVI placed asbestos-containing materials into the stream of commerce, which resulted in Farrow working on or around those products. This evidence is sufficient to survive summary judgment. Accordingly, the trial court erred by ruling to the contrary.

Slip Op., p. 17 (emphasis added).

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[11] It appears that Flowserve, lacking the ability to "pound" the law or facts, is attempting to "pound the table."

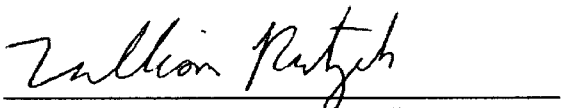
IV. CONCLUSION

For the foregoing reasons, the petition for review should be denied.

DATED at Seattle, Washington, this 16th day of June, 2014.

Respectfully Submitted,

SCHROETER, GOLDMARK & BENDER



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CERTIFICATE OF SERVICE

I hereby certify under penalty of perjury that under the laws of the State of Washington that on the 16th day of June, 2014, I caused true and correct copy of the foregoing document, Respondents' Answer to Petition for Review, to be delivered in the manner indicated below to the following counsel of record:

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DATED at Seattle, Washington this 16th day of June 2014

NONA FARLEY

OFFICE RECEPTIONIST, CLERK

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To: 'Farley, Nona'
Cc: raliment@williamskastner.com; Breen, Thomas; Jones, Rhonda; Rutzick, Bill; Houser, Kristin
Subject: RE: Farrow-Respondents' Answer to Petition for Review No. 90282-8

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Subject: Farrow-Respondents' Answer to Petition for Review No. 90282-8

Dear Clerk of Court:

Attached please find Respondents' Answer to Petition for Review for filing today.

This document is filed in:

MICHAEL FARROW and LIDIA FARROW v. FLOWSERVE US INC.
Supreme Court No. 90282-8

This document is filed by:

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