

No. 46126-9-II Consolidated

COURT OF APPEALS, DIVISION II
OF THE STATE OF WASHINGTON

In Re the Dependency of

L.C.B.-S. and L.P.B.-S.,

Minor Children,

R.B. (father)

Appellant.

Clark Cause Nos. 13-7-00704-7 and 13-7-00705-5

The Honorable Commissioner Carin Schienberg

**Appellant's Motion for Accelerated
Review and Opening Brief**

Jodi R. Backlund
Manek R. Mistry
Skylar T. Brett
Attorneys for Appellant

BACKLUND & MISTRY
P.O. Box 6490
Olympia, WA 98507
(360) 339-4870
Email: backlundmistry@gmail.com

TABLE OF CONTENTS

TABLE OF CONTENTS i

TABLE OF AUTHORITIES iii

ISSUES AND ASSIGNMENTS OF ERROR..... 1

STATEMENT OF FACTS AND PRIOR PROCEEDINGS..... 3

ARGUMENT..... 6

I. The court should have given R.B. the opportunity to establish *de facto* parentage..... 6

A. Standard of Review..... 6

B. The court erred by failing to hold an evidentiary hearing to permit R.B. to establish *de facto* parentage. 6

II. The court erred by declining to permit concurrent jurisdiction so R.B. could establish *de facto* parentage in family court..... 11

A. Standard of Review..... 11

B. If the juvenile court was unwilling to adjudicate R.B.'s claim for *de facto* parentage, it should have granted concurrent jurisdiction to permit a hearing on the issue in family court..... 11

III. The court erred by denying R.B.'s motion to intervene. 13

A. Standard of Review..... 13

B. R.B. has a right to intervene in this dependency action, because he has an interest that will be affected by the court's decision, and his interest is not represented by the existing parties. 13

CONCLUSION 14

TABLE OF AUTHORITIES

WASHINGTON STATE CASES

<i>Alonso v. Qwest Commc'ns Co., LLC</i> , 178 Wn. App. 734, 315 P.3d 610 (2013).....	9, 10
<i>Brunson v. Pierce Cnty.</i> , 149 Wn. App. 855, 205 P.3d 963 (2009)....	11, 13
<i>Doe v. Puget Sound Blood Ctr.</i> , 117 Wn.2d 772, 819 P.2d 370 (1991) ...	12
<i>Ferencak v. Dep't of Labor & Indus.</i> , 142 Wn. App. 713, 175 P.3d 1109 (2008).....	13
<i>Fowler v. Johnson</i> , 167 Wn. App. 596, 273 P.3d 1042 (2012)	9
<i>In re Adoption of S.H.</i> , 169 Wn. App. 85, 279 P.3d 474 (2012).....	9
<i>In re Custody of A.F.J.</i> , 179 Wn.2d 179, 314 P.3d 373 (2013)	6, 7, 9
<i>In re Custody of B.M.H.</i> , 179 Wn.2d 224, 315 P.3d 470 (2013)	8
<i>In re Custody of M.J.M.</i> , 173 Wn. App. 227, 294 P.3d 746 (2013).....	8
<i>In re Dependency of E.H.</i> , 158 Wn. App. 757, 243 P.3d 160 (2010).....	11
<i>In re Dependency of J.W.H.</i> , 147 Wn.2d 687, 57 P.3d 266 (2002)	14
<i>In re Dependency of M.R.</i> , 78 Wn. App. 799, 899 P.2d 1286 (1995).....	7
<i>In re Estate of Henington</i> , 44246-9-II, 2014 WL 3611288, --- Wn. App. ---, --- P.3d --- (July 22, 2014).....	6
<i>In re Marriage of Kim</i> , 179 Wn. App. 232, 317 P.3d 555 (2014) <i>review denied</i> , 180 Wn.2d 1012, 325 P.3d 914 (2014)	11
<i>In re Parentage of J.A.B.</i> , 146 Wn. App. 417, 191 P.3d 71 (2008).....	8
<i>In re Parentage of L.B.</i> , 155 Wn.2d 679, 122 P.3d 161 (2005)6, 7, 8, 9, 10, 12	

<i>In re Parentage of M.F.</i> , 168 Wn.2d 528, 228 P.3d 1270 (2010).....	8
<i>Kustura v. Dep't of Labor & Indus.</i> , 169 Wn.2d 81, 233 P.3d 853 (2010).....	13
<i>State v. Williams</i> , 176 Wn. App. 138, 307 P.3d 819 (2013).....	13

CONSTITUTIONAL PROVISIONS

Wash. Const. art. I, § 10.....	12
Wash. Const. art. IV, § 6.....	11

WASHINGTON STATUTES

RCW 13.04.011	7
RCW 13.04.030	11
RCW 13.34.030	12
RCW 13.34.155	12
RCW 26.12.010	11
Wash. Legis. Serv. Ch. 520 (2009).....	12
Wash. Legis. Serv. Ch. 526 (2009).....	12

OTHER AUTHORITIES

CR 24	14
-------------	----

ISSUES AND ASSIGNMENTS OF ERROR

1. The court erred by refusing to hold an evidentiary hearing on R.B.'s claim for *de facto* parentage.
2. The court erred by entering findings regarding contested facts without holding an evidentiary hearing.
3. The juvenile court erred by entering finding 2.
4. The juvenile court erred by entering finding 3.
5. The juvenile court erred by entering finding 6.
6. The juvenile court erred by entering finding 7.
7. The juvenile court erred by entering finding 9.
8. The superior court erred by entering finding 1.4.
9. The superior court erred by entering finding 1.5.
10. The superior court erred by entering finding 1.6.

ISSUE 1: Upon a *prima facie* showing that a person qualifies as a *de facto* parent a court must hold an evidentiary hearing on the matter. Here, R.B. presented *prima facie* evidence that he had met the onerous requirements for *de facto* parentage but the juvenile court refused to consider the matter. Did the court err by denying R.B. an evidentiary hearing on his *de facto* parentage claim?

11. The court erred by refusing to grant concurrent jurisdiction with the family court to consider R.B.'s claim for *de facto* parentage.
12. The juvenile court erred by entering finding 10.
13. The superior court erred by entering order 2.1.
14. The superior court erred by denying the motion for revision.

ISSUE 2: A juvenile court may waive its exclusive jurisdiction over cases concerning dependent children, and grant the family court concurrent jurisdiction to adjudicate custody issues. Here, the juvenile court declined to hold a hearing on R.B.'s claim of *de facto* parentage but also refused to grant concurrent jurisdiction to permit him to pursue the matter in family court. Did the court err by denying R.B.'s motion for concurrent jurisdiction?

15. The court erred by denying R.B.'s motion to intervene.
16. The juvenile court erred by entering finding 8.
17. The superior court erred by entering finding 1.7.
18. The superior court erred by entering order 2.2.

ISSUE 3: A person has a right to intervene in a dependency case in which s/he has a legitimate interest that is not represented by the extant parties. Here, R.B. produced *prima facie* evidence that he is a *de facto* parent whose interest was not being represented by the parties to the dependency action. Did the court err by denying R.B.'s motion to intervene?

STATEMENT OF FACTS AND PRIOR PROCEEDINGS

R.B. parented twin girls L.C.B.-S. and L.P.B.-S. from their birth in February 2012. CP 131.¹ He believed he was their biological father. CP 131. R.B. cared for the mother in the hospital after the twins' birth. RP 1-2. The girls have R.B.'s last name. *See e.g.* CP 1.

R.B., the twins, and the mother lived together for approximately eight months. CP 131. R.B. bathed, fed, and cared for the girls. CP 131. He put them to bed. CP 131. He took them to medical and WIC appointments. CP 131. He supported them financially. CP 131.

Sometimes the mother would disappear for up to a week at a time due to drug abuse. CP 131. During those times, R.B. cared for the twins by himself. CP 131. At other times, the mother left for multiple days, taking the girls with her. CP 131. During those times, R.B. searched for them. CP 131. Sometimes the mother was in jail. CP 16. R.B. cared for the twins on his own during those periods. CP 16.

At some point, the mother took the twins to stay in a known drug house. CP 2. She sometimes left the girls unsupervised while she used methamphetamine. Other times, she smoked meth while the twins were

¹ Each of the citations to the clerk's papers are from the court file in L.C.B.-S's case. L.P.B.-S.'s clerk's papers contain identical facts.

present. CP 2. The house had no food in it. CP 2. R.B. tried to locate the mother and twins throughout this period. CP 131.

Eventually, the mother was arrested at the drug house. The twins were sixteen months old at the time. They were taken into protective custody. CP 1-2. The mother later agreed to a dependency order. CP 67-76. She never engaged in regular visitation with the girls. Permanency Planning Order (5/13/14), Supp CP.

As soon as R.B. found out that the twins were in state custody, he came forward and told DSHS that he was the girls' father. CP 41. R.B. began regular visitation with the girls. CP 99. The twins immediately recognized R.B. and demonstrated a bond with him. RP 13. At the first visit, the girls searched for R.B. and called him "dada." RP 13-14. The girls looked to R.B. for comfort and to meet their needs. RP 13.

After several months of visits, a DNA test established that R.B. was not the twins' biological father.² CP 99. The state moved to dismiss R.B. as a party to the dependency case. CP 166-70. R.B. opposed the motion. CP 131-39. He moved to the court to permit him to establish that he is a *de facto* parent to the twins. CP 131-39. In the alternative, he asked the court to: (a) waive its exclusive jurisdiction over the case to

² There were two other alleged fathers listed on the twins' dependency petitions. CP 1. The twins were found dependent as to both of those alleged fathers by default. CP 54-63, 84-92. Neither of them has come forward to engage in the dependency process. CP 123.

permit him to establish *de facto* parenthood in family court; or (b) to allow him to intervene in the dependency case. CP 131-39.

The mother submitted a declaration contesting R.B.'s factual allegations regarding his status as a *de facto* parent. CP153-55. The juvenile court did not hold an evidentiary hearing. CP 191. The commissioner denied R.B.'s motions and dismissed him as a party to the dependency action. CP 181-83, 171. The commissioner stated that the court was "not willing to use the dependency process to establish *de facto* parentage." CP 82. Even though the court did not hold an evidentiary hearing, the commissioner adopted many of the mother's factual allegations and incorporated them into findings of fact. CP 81-82.

R.B. moved for revision of the commissioner's ruling in superior court. CP 185-89. He argued that the commissioner should have taken testimony before entering findings regarding contested facts. RP 2. He stated that he would have been able to demonstrate that he had been actively involved in the twins' lives since birth. RP 2.

The twins' court-appointed special advocate (CASA) presented argument at the revision hearing. RP 13-16. She confirmed that R.B.'s role in the girls' lives was "parental in nature" and that he was bonded with them before the dependency action began. RP 13.

The court denied R.B.’s motion for revision. CP 193-94. The superior court judge did not take testimony. Like the commissioner, the judge adopted some of the mother’s version of the contested facts. CP 194.

This timely appeal follows. CP 198.

ARGUMENT

I. THE COURT SHOULD HAVE GIVEN R.B. THE OPPORTUNITY TO ESTABLISH *DE FACTO* PARENTAGE.

A. Standard of Review.

Issues of law are reviewed *de novo*. *In re Estate of Henington*, 44246-9-II, 2014 WL 3611288, --- Wn. App. ---, --- P.3d --- (July 22, 2014).

B. The court erred by failing to hold an evidentiary hearing to permit R.B. to establish *de facto* parentage.

Washington law “recognizes that a parental bond with a child may be formed in many ways.” *In re Custody of A.F.J.*, 179 Wn.2d 179, 182, 314 P.3d 373 (2013). Thus, Washington courts recognize *de facto* parentage for people who have formed a bonded parental relationship with a child, encouraged by the child’s biological parent. *In re Parentage of L.B.*, 155 Wn.2d 679, 708, 122 P.3d 161 (2005). A *de facto* parent “stands in legal parity with an otherwise legal parent, whether biological,

adoptive, or otherwise.” *A.F.J.*, 179 Wn.2d at 182 (internal quotation omitted).³

It is “unsurprising” that “statutes often fail to contemplate all potential scenarios which may arise in the ever changing and evolving notion of familial relations.” *L.B.*, 155 Wn.2d at 706. But the legislature’s failure to include every familial situation in a statutory scheme does not preclude redress under the doctrine of *de facto* parentage. *Id.* at 707. Instead, the doctrine serves to “fill the interstices” in current statutes. *Id.*

Because *de facto* parents stand in legal parity with biological and adoptive parents. *A.F.J.*, 179 Wn.2d at 182.⁴ Accordingly, a *de facto* parent would have the same role in a dependency case as any other parent.⁵

A de facto parent must demonstrate that:

³ The *A.F.J.* court recognized *de facto* parent status for the long-term caregiver of a dependent child. *A.F.J.*, 179 Wn.2d 179. The court did not clarify, however, whether the *de facto* parent would thereby be considered a “parent” under the definition at RCW 13.04.011(5).

⁴ In 1995, Division I held that “psychological parents” do not qualify as parents for purposes of dependency proceedings. *In re Dependency of M.R.*, 78 Wn. App. 799, 801, 899 P.2d 1286, 1288 (1995). *M.R.* was decided long before the supreme court recognized *de facto* parentage and held that *de facto* parents stand in legal parity to biological and adoptive parents. *L.B.*, 155 Wn.2d at 708. *M.R.* no longer controls.

⁵ RCW 13.04.011(5) defines the term “parent” for purposes of RCW chapter 13.34 to include “the biological or adoptive parents of a child unless the legal rights of that person have been terminated by judicial proceedings.” RCW 13.04.011(5).

1) the natural or legal parent consented to and fostered the parent-like relationship, (2) the petitioner and the child lived together in the same household, (3) the petitioner assumed obligations of parenthood without expectation of financial compensation, and (4) the petitioner has been in a parental role for a length of time sufficient to have established with the child a bonded, dependent relationship, parental in nature

L.B., 155 Wn.2d at 708. The *de facto* parent must also prove that s/he has “fully and completely undertaken a permanent, unequivocal, committed, and responsible parental role in the child's life.” *Id.*

Element (4) does not preclude a finding of *de facto* parentage for very young children. *See e.g. In re Custody of M.J.M.*, 173 Wn. App. 227, 294 P.3d 746 (2013). The *de facto* parent in *M.J.M.* was able to establish his status by demonstrating the he lived with the young child for fourteen months. *Id.* at 236.

Once a person has made a *prima facie* showing of *de facto* parentage, the court must hold an evidentiary hearing to determine whether the elements have been met. *See e.g. In re Custody of B.M.H.*, 179 Wn.2d 224, 232, 315 P.3d 470 (2013) (finding that petitioner had established *prima facie* case for *de facto* parentage); *In re Parentage of M.F.*, 168 Wn.2d 528, 530, 228 P.3d 1270 (2010) (referring to the trial court’s ruling that the alleged *de facto* parent had presented a *prima facie* case); *In re Parentage of J.A.B.*, 146 Wn. App. 417, 421, 191 P.3d 71(2008) (referring to a trial on the issue if *de facto* parentage); *M.J.M.*,

173 Wn. App. at 233 (detailing that a commissioner had entered an order of adequate cause to proceed to trial on the issue if *de facto* parentage).

The *prima facie* standard generally requires a court to consider the evidence in the light most favorable to the petitioning party. *See e.g.* *Alonso v. Qwest Commc'ns Co., LLC*, 178 Wn. App. 734, 743, 315 P.3d 610 (2013); *In re Adoption of S.H.*, 169 Wn. App. 85, 87, 279 P.3d 474 (2012); *Fowler v. Johnson*, 167 Wn. App. 596, 601 n. 4, 273 P.3d 1042 (2012).

If the court had permitted R.B. to establish his *de facto* parentage of the twins, he would have gained the right to stand in parity with their mother in the dependency action. *A.F.J.*, 179 Wn.2d at 182. Despite the father's *prima facie* evidence, the dependency court refused to entertain his claim. CP 82.

R.B. presented a *prima facie* case sufficient for an evidentiary hearing to determine whether he qualifies as a *de facto* parent. *L.B.*, 155 Wn.2d at 708. R.B. demonstrated that the twins' mother consented to and fostered his parent-like relationship with the girls: she gave them his last name, moved in with him, permitted him to care for them, and left them alone with him for up to a week at a time. CP 1, 131-32. It was uncontested that R.B. and the twins lived together for a significant period of time. CP 131-32, 153-55. The mother did not claim that R.B. assumed

the obligation of caring for the twins with an expectation of financial compensation. CP 153-55. R.B. showed that he had been in a parental role long enough to establish a parent-like relationship. He demonstrated that the twins were bonded with him, called him “dada,” and relied on him for their care during visits. RP 13-14. Viewing the evidence in the light most favorable to R.B., he made a *prima facie* showing of *de facto* parenthood sufficient to entitle him to an evidentiary hearing on his claim. *L.B.*, 155 Wn.2d at 708.

Instead of taking testimony, however, the juvenile court adopted the mother’s version of some contested facts and then declined to consider R.B.’s claim at all. CP 81-82. The court erred by failing to consider the evidence in the light most favorable to R.B. and by refusing to hold an evidentiary hearing. *Alonso*, 178 Wn. App. at 743. The lower court’s order must be reversed and this case remanded for a hearing on the issue of whether R.B. has established *de facto* parentage. *L.B.*, 155 Wn.2d at 708.

II. THE COURT ERRED BY DECLINING TO PERMIT CONCURRENT JURISDICTION SO R.B. COULD ESTABLISH *DE FACTO* PARENTAGE IN FAMILY COURT.

A. Standard of Review.

A court's "best interests" determination is reviewed for abuse of discretion. *See e.g. In re Marriage of Kim*, 179 Wn. App. 232, 240, 317 P.3d 555 (2014) *review denied*, 180 Wn.2d 1012, 325 P.3d 914 (2014). Failure to exercise discretion is, itself, an abuse of discretion. *Brunson v. Pierce Cnty.*, 149 Wn. App. 855, 861, 205 P.3d 963 (2009).

B. If the juvenile court was unwilling to adjudicate R.B.'s claim for *de facto* parentage, it should have granted concurrent jurisdiction to permit a hearing on the issue in family court.

The legislature has granted juvenile courts exclusive original jurisdiction over dependent children.⁶ RCW 13.04.030(1)(b). But the juvenile courts exercise concurrent jurisdiction with family courts⁷ when

⁶ Superior courts have original jurisdiction over "all cases and ... proceedings in which jurisdiction shall not have been by law vested exclusively in some other court." Wash. Const. art. IV, § 6; *In re Dependency of E.H.*, 158 Wn. App. 757, 764, 243 P.3d 160 (2010). The legislature created juvenile courts by statute. *Id.* at 765. But the creation of juvenile courts postdates the adoption of article IV and does not subtract from the superior court's jurisdiction. *Id.* Juvenile courts are not separate courts, but simply divisions of the superior court. *Id.* at 766. By creating juvenile courts, the legislature simply distributed the work of the courts and described the procedure by which the superior court would deal with matters related to juveniles. *Id.* at 765. Thus, the superior court retains the possibility of concurrent jurisdiction over any matter considered by a juvenile or family court. *Id.*

⁷ "Family court" is the name under which superior courts operate when conducting business under RCW chapter 26. RCW 26.12.010. Family courts have concurrent jurisdiction with juvenile courts in matters related to dependent children. RCW 26.12.010(2).

doing so is in the child's best interest or is necessary to achieve permanency. *See* RCW 13.34.030(3); RCW 13.34.155 (as amended by 2009 c 520); RCW 13.34.155(2)(g) (as amended by 2009 c 526).⁸

When an issue relating to the establishment of a parenting plan for a dependent child arises, the dependency court may either hear the matter itself or transfer it to family court.⁹ RCW 13.34.155 (as amended by 2009 c 526). The court may grant a motion for transfer to family court upon a finding that it would be in the child's best interest. RCW 13.34.155(2)(g) (as amended by 2009 c 526).

R.B.'s status as a *de facto* parent would have entitled him to petition for residential time with the twins pursuant to a parenting plan. *L.B.*, 155 Wn.2d at 708. It could also have created permanency for the twins. The girls' CASA argued in support of R.B.'s motion to establish *de facto* parentage. RP 13-16. Still, the court did not enter a finding regarding whether concurrent jurisdiction with family court was in the children's best interest. CP 82, 193-94. The court abused its discretion by

⁸ RCW 13.34.155 was amended twice in 2009 by different bills. *See* 2009 Wash. Legis. Serv. Ch. 520 (S.S.H.B. 2106); 2009 Wash. Legis. Serv. Ch. 526 (S.H.B. 1239). Accordingly, there are currently two parallel versions of the statute dealing with related issues.

⁹ A dependency court's failure to either hear such an issue itself or transfer the matter to superior court would leave colorable claims without any forum for redress. Such a situation would raise questions about access to courts. Wash. Const. art. I, § 10; *Doe v. Puget Sound Blood Ctr.*, 117 Wn.2d 772, 780-81, 819 P.2d 370 (1991).

failing to determine whether a waiver of exclusive jurisdiction would have been in the twins' best interest. *Brunson*, 149 Wn. App. at 861.

If the juvenile court was unwilling to adjudicate R.B.'s claim for *de facto* parentage, the court should have waived exclusive jurisdiction to allow the claim to be heard in family court. This case must be remanded with an order granting the family court concurrent jurisdiction to determine R.B.'s motion to establish *de facto* parentage.

III. THE COURT ERRED BY DENYING R.B.'S MOTION TO INTERVENE.

A. Standard of Review.

A court's decision on a motion to intervene is reviewed for abuse of discretion. *Ferencak v. Dep't of Labor & Indus.*, 142 Wn. App. 713, 720, 175 P.3d 1109 (2008) *aff'd on other grounds sub nom. Kustura v. Dep't of Labor & Indus.*, 169 Wn.2d 81, 233 P.3d 853 (2010). A court abuses its discretion if its decision is manifestly unreasonable, based on untenable grounds, or made for untenable reasons. *State v. Williams*, 176 Wn. App. 138, 141, 307 P.3d 819 (2013).

B. R.B. has a right to intervene in this dependency action, because he has an interest that will be affected by the court's decision, and his interest is not represented by the existing parties.

A new party has a right to intervene in an action when, *inter alia*:

the applicant claims an interest relating to the property or transaction which is the subject of the action and he is so situated that the disposition of the action may as a practical matter impair or impede his ability to protect that interest, unless the applicant's interest is adequately represented by existing parties.

CR 24(a)(2).

This rule can apply in dependency cases. *In re Dependency of J.W.H.*, 147 Wn.2d 687, 700, 57 P.3d 266 (2002). A person has a right to intervene if s/he has a valid interest related to a dependent child that is not adequately protected by the other parties. *Id.*

As outlined above, R.B. made a *prima facie* showing that he stood in the role of *de facto* parent to the twins. That interest was not represented by the existing parties to the dependency action: the state and the mother. Accordingly, R.B. had a right to intervene. CR 24(a)(2).

The court erred by denying R.B.'s motion to intervene in the twins' dependency case. CR 24(a)(2); *J.W.H.*, 147 Wn.2d at 700. The court's ruling must be reversed and the case remanded to permit him to intervene.

CONCLUSION

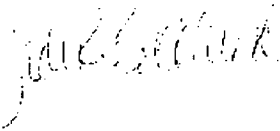
The juvenile court erred by refusing to hold an evidentiary hearing when R.B. presented *prima facie* evidence that he qualified as a *de facto* parent to the twins. In the alternative, if the juvenile court was unwilling to consider the motion, it erred by failing to grant concurrent jurisdiction

to permit the issue to be addressed in family court. This case must be remanded for an evidentiary hearing on R.B.'s motion in either juvenile or family court.

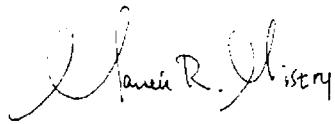
The court also erred by denying R.B.'s motion to intervene in the dependency action. R.B. had an interest in the case that would be affected by the court's decision. His interest was not represented by any of the existing parties. The case must be remanded to permit R.B. to intervene.

Respectfully submitted on August 6, 2014.

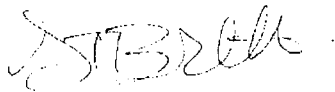
BACKLUND AND MISTRY



Jodi R. Backlund, WSBA No. 22917
Attorney for the Appellant



Manek R. Mistry, WSBA No. 22922
Attorney for the Appellant



Skylar T. Brett, WSBA No. 45475
Attorney for Appellant

CERTIFICATE OF MAILING

I certify that on today's date:

I mailed a copy of Appellant's Motion for Accelerated Review/Opening Brief, postage prepaid, to:

R.B. (father)
403 N. Morrison Road
Vancouver, WA 98664

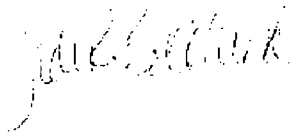
And:

Attorney General of Washington
1220 Main St Ste 510
Vancouver WA 98660

I filed the Appellant's Motion for Accelerated Review/Opening Brief electronically with the Court of Appeals, Division II, through the Court's online filing system.

I CERTIFY UNDER PENALTY OF PERJURY UNDER THE LAWS OF THE STATE OF WASHINGTON THAT THE FOREGOING IS TRUE AND CORRECT.

Signed at Olympia, Washington on August 6, 2014.



Jodi R. Backlund, WSBA No. 22917
Attorney for the Appellant

BACKLUND & MISTRY

August 06, 2014 - 2:22 PM

Transmittal Letter

Document Uploaded: 461269-Appellant's Brief.pdf

Case Name: In Re LCBS and LPBS

Court of Appeals Case Number: 46126-9

Is this a Personal Restraint Petition? Yes No

The document being Filed is:

Designation of Clerk's Papers Supplemental Designation of Clerk's Papers

Statement of Arrangements

Motion: ____

Answer/Reply to Motion: ____

Brief: Appellant's

Statement of Additional Authorities

Cost Bill

Objection to Cost Bill

Affidavit

Letter

Copy of Verbatim Report of Proceedings - No. of Volumes: ____

Hearing Date(s): _____

Personal Restraint Petition (PRP)

Response to Personal Restraint Petition

Reply to Response to Personal Restraint Petition

Petition for Review (PRV)

Other: _____

Comments:

No Comments were entered.

Sender Name: Manek R Mistry - Email: backlundmistry@gmail.com

A copy of this document has been emailed to the following addresses:

matt.etter@atg.wa.gov