Supreme Court No. 91560-1
COA No. 71651-4-I

IN THE SUPREME COURT OF THE STATE OF WASHINGTON

STATE OF WASHINGTON,

Respondent,

v.

WILLIAM BENJAMIN BRATTON,

Petitioner.

PETITION FOR REVIEW

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TABLE OF CONTENTS

TABLE OF AUTHORITIES

Constitutional Provisions

Washington Cases

United States Supreme Court Cases

Other Jurisdictions

Statutes

A. IDENTITY OF PETITIONER/DECISION BELOW

William Benjamin Bratton requests this Court grant review pursuant to RAP 13.4 of the unpublished decision of the Court of Appeals in State v. Bratton, No. 71651-4-I, filed February 17, 2015. A copy of the opinion is attached as an appendix.

B. ISSUES PRESENTED FOR REVIEW

1. Before a trial court may order that a person charged with a crime be forcibly medicated in order to restore him to competency, the court must consider four factors set forth by the United States Supreme Court in Sell v. United States, 539 U.S. 166, 123 S. Ct. 2174, 156 L. Ed. 2d 197 (2003). Regarding the first Sell factor, the State must show that governmental interests at stake are sufficiently important to justify forced medication. Here, the trial court found that the State had a sufficiently important interest in forcibly medicating Mr. Bratton based solely on the crime charged without considering the individual circumstances of the case. Analysis of the Sell decision, and cases from other jurisdictions applying that case, leads to the conclusion that a trial court must consider not only the crime charged but also the facts of the individual case in deciding whether the State's interest is sufficiently important. Given the absence of case law in Washington

addressing this question, and the need for guidance from this Court, is this a significant issue of constitutional law and substantial public interest that warrants review? RAP 13.4(b)(3), (4).

2. The Court of Appeals reversed the trial court's order authorizing forced medication to restore Mr. Bratton to competency, based on the State's concession that it had not proved that forced medication was the least intrusive alternative available. But the court did not address whether the trial court had properly applied the first Sell factor in ordering forced medication. Did the Court of Appeals erroneously find the issue moot where it will recur on remand if the State again seeks an order for involuntary medication?

3. A reviewing court may address an issue that is technically moot if the case presents an issue of continuing and substantial public interest that will likely reoccur, in order to provide guidance to lower courts. Should this Court address the legal question of whether the trial court properly applied the first Sell factor, where there is little case law in Washington addressing how to interpret and apply the Sell factors, and guidance for the lower courts is needed?

4. Other courts considering the issue have concluded that the first of the Sell factors is a question of law reviewed de novo, the

second factor is a mixed question of law and fact, and the third and fourth factors are questions of fact reviewed for sufficient evidence. Should Washington courts adopt these standards of review?

C. STATEMENT OF THE CASE

William Bratton is a 58-year-old man who at the time of his arrest had been living alone in an apartment in Lake City for about two and a half years. CP 8, 29. He had worked at Boeing as a design engineer and retired in 2008. CP 29. He was permanently disabled due to hearing loss. CP 29.

According to the certification for determination of probable cause, federal agents discovered that Mr. Bratton's name and email address were used to purchase access to a known child-pornography website in 2007. CP 23. Five years later, in November 2012, agents contacted Mr. Bratton at his apartment. Id. Mr. Bratton consented to a search of his computer and hard drives which revealed a large number of images of suspected child pornography. CP 24.

Mr. Bratton later explained during a mental health evaluation that he believed someone had hacked into his computer and installed the images on his hard drive. CP 31. He suspected espionage and had sought help for the suspected espionage from the FBI. Id. When

federal agents came to his home to investigate, he thought they were there to resolve the situation he had reported. Id. That is why he freely agreed to allow them to seize and search his computer. Id.

Mr. Bratton was charged with two counts of first degree possession of depictions of a minor engaged in sexually explicit conduct, RCW 9.68A.070(1), 9.68A.011(4)(a)-(e). CP 1-2.

At defense counsel's request, the trial court ordered that Mr. Bratton be evaluated to determine whether he was competent to stand trial and assist in his defense. 11/21/13RP 3-5.

Mr. Bratton was evaluated by a psychologist at Western State Hospital (Western) in early 2014. CP 28-33. He was not currently involved in mental health treatment and was taking no psychotropic medications. CP 30-31. He reported he had only one prior mental health hospitalization in June 2009, when he had been diagnosed with major depression. CP 30.

The evaluator diagnosed Mr. Bratton with psychotic disorder, not-otherwise-specified, rule out delusional disorder or paranoid schizophrenia and concluded that, due to his mental illness, Mr. Bratton was not competent to understand the nature of the proceedings or assist in his defense. CP 32-33. The evaluator recommended he be admitted

to Western and administered psychotropic medications against his will if necessary in order to restore his competency. CP 33.

The State filed a motion requesting inpatient commitment and an order allowing Western to forcibly medicate Mr. Bratton against his will if necessary. CP 15-18. Mr. Bratton objected to commitment at Western and forced medication. CP 34-57.

A hearing was held on March 20, 2014. A psychiatrist from Western, Sukhinder Aulakh, testified. 3/10/14RP 7. Dr. Aulakh said it was possible but not certain that antipsychotic medications could restore Mr. Bratton to competency. 3/10/14RP 14, 16-18. Those medications carry possible short-term and long-term side effects. 3/10/14RP 14-15, 20-21.

Dr. Aulakh said that Western did not have an outpatient competency restoration program. 3/10/14RP 16-17. He acknowledged that clinics exist in the community where individuals can receive antipsychotic medication. 3/10/14RP 34. He agreed that Mr. Bratton was not a danger to himself or the public and would not otherwise be subject to civil commitment. 3/10/14RP 34. Mr. Bratton had lived on his own in an apartment for years and could function in the community;

he was able to support himself through his pension and disability income. 3/10/14RP 31-32, 34.

Defense counsel argued strenuously against involuntary commitment and forced medication. Counsel argued the criminal charges were not sufficiently "serious" to justify forced medication. 3/10/14RP 42-45. Moreover, involuntary commitment with forced medication was not the least intrusive alternative because Mr. Bratton was willing to take psychotropic medication on an outpatient basis and receive treatment from his local community mental health clinic in Lake City. 3/10/14RP 43. Finally, Mr. Bratton would be significantly harmed if committed to Western because he would likely lose his apartment, which "has made all the difference in his well-being." 3/10/14RP 47. Before landing his apartment, he had been homeless and seriously depressed. 3/10/14RP 47.

Nonetheless, the court granted the State's motion to commit Mr. Bratton involuntarily and forcibly medicate him if necessary. 3/10/14RP 51-53; CP 58-63.

Mr. Bratton appealed, arguing: (1) the trial court erroneously found the State had a sufficiently important interest in forcibly medicating Mr. Bratton based solely on the crime charged without

considering the circumstances of the case; and (2) the court erred in finding that no less intrusive alternative was available, where Mr. Bratton agreed to take medication and be treated in the community.

The State conceded error regarding the second argument, *i.e.*, that the trial court erred in finding there was no less intrusive alternative than forced medication. The State argued that the case should be remanded for an evidentiary hearing to determine whether to order inpatient restoration without an order for involuntary medication. The State did not address the first argument raised by Mr. Bratton.

The Court of Appeals ordered the parties to file supplemental briefs addressing whether the first argument was moot given the State's concession of error. Mr. Bratton argued the issue was not moot because it could recur on remand and presented an issue of substantial public importance that will arise in other cases. The Court of Appeals accepted the State's concession that it failed to establish by clear and convincing evidence that involuntary medication was necessary to restore Mr. Bratton to competency and there was no less intrusive treatment likely to achieve substantially the same result. But the court did not address the remaining issues, finding they were moot. Appendix.

D. ARGUMENT WHY REVIEW SHOULD BE GRANTED

1. Whether a trial court must consider not only the crime charged but also the circumstances of the individual case in deciding whether the State's interest is sufficiently serious to justify an order requiring forced medication is a significant question of constitutional law and substantial public importance warranting review, RAP 13.4(b)(3), (4)

The United States Supreme Court has repeatedly recognized that forcibly medicating an individual against his will "represents a substantial interference with that person's liberty." Washington v. Harper, 494 U.S. 210, 229, 110 S. Ct. 1028, 108 L. Ed. 2d 178 (1990). Every individual has a "significant" constitutionally protected liberty interest in "avoiding the unwanted administration of antipsychotic drugs." Id. at 221-22; U.S. Const. amend. XIV; Const. art. I, § 3.

The involuntary administration of such drugs represents an interference with a person's right to privacy, right to produce ideas, and ultimately the right to a fair trial. Riggins v. Nevada, 504 U.S. 127, 134-35, 112 S. Ct. 1810, 118 L. Ed. 2d 479 (1992). An individual has a constitutionally protected liberty "interest in avoiding involuntary administration of antipsychotic drugs"—an interest that only an "essential" or "overriding" state interest might overcome. Id.

The Due Process Clause permits the government to administer psychotropic medication to a mentally-ill defendant facing serious criminal charges in order to render him competent to stand trial only if the treatment is medically appropriate, is substantially unlikely to have side effects that may undermine the fairness of the trial, and, taking account of less intrusive alternatives, is necessary significantly to further an important governmental interest. Sell v. United States, 539 U.S. 166, 179, 123 S. Ct. 2174, 156 L. Ed. 2d 197 (2003). The governmental interest at issue is "the interest in rendering the defendant *competent to stand trial*." Id. at 181.

Before a court may authorize forced medication, the State must prove the four factors set forth by the Court in Sell. Id. at 180-81; State v. Hernandez-Ramirez, 129 Wn. App. 504, 510, 119 P.3d 880 (2005).

First, "a court must find that *important* governmental interests are at stake." Sell, 539 U.S. at 180. The State's interest in bringing to trial an individual accused of a serious crime is important, whether the crime is one against the person or one against property. Id. But courts must also "consider the facts of the individual case in evaluating the Government's interest in prosecution." Id. Special circumstances may lessen the importance of that interest. Id. For instance, the defendant's

failure to take drugs voluntarily may mean lengthy civil commitment in an institution for the mentally ill that would diminish the risks that ordinarily attach to freeing without punishment a person who has committed a serious crime. Id. For similar reasons, the State's interest in prosecution is lessened if the defendant has already been confined for a significant amount of time, for which he would receive credit toward any sentence ultimately imposed. Id.

Second, "the court must conclude that involuntary medication will *significantly further* those concomitant state interests." Id. at 181. It must find that administration of the drugs is substantially likely to render the defendant competent to stand trial and substantially unlikely to have side effects that would interfere significantly with his ability to assist his attorney, thereby rendering the trial unfair. Id.

Third, "the court must conclude that involuntary medication is *necessary* to further those interests." Id. This is a two-part inquiry. The court must (1) find that any alternative, less intrusive treatment is unlikely to achieve substantially the same results, and (2) "consider less intrusive means for administering the drugs, *e.g.*, a court order to the defendant backed up by the contempt power, before considering more intrusive methods." Id.

Fourth, "the court must conclude that administration of the drugs is *medically appropriate, i.e.*, in the patient's best medical interest in light of his medical condition." Id. Different drugs may produce different side effects and enjoy different levels of success. Id.

The Sell factors do not represent a balancing test, but a set of independent requirements, each of which must be found to be true before the forcible administration of psychotropic drugs is constitutionally permissible. State v. Lopes, 355 Or. 72, 91, 322 P.3d 512 (2014). "[T]o comport with due process an order compelling involuntary administration of antipsychotic medication requires 'thorough consideration and justification' and 'especially careful scrutiny,' and must be based on 'a medically-informed record.'" Id. (quoting United States v. Ruiz-Gaxiola, 623 F.3d 684, 691 (9th Cir. 2010)). Ultimately, Sell orders are disfavored due to "[t]he importance of the defendant's liberty interest, the powerful and permanent effects of anti-psychotic medications, and the strong possibility that a defendant's trial will be adversely affected by the drug's side-effects." United States v. Rivera-Guerrero, 426 F.3d 1130, 1137-38 (9th Cir. 2005). Thus, forcible medication should be ordered only rarely. Id.

The State bears the burden to prove each factor by clear, cogent and convincing evidence. Hernandez-Ramirez, 129 Wn. App. at 510.

The first Sell factor requires the court to determine whether "*important* governmental interests are at stake." Sell, 539 U.S. at 180. The court must consider not only the seriousness of the crime charged but also "the facts of the individual case in evaluating the Government's interest in prosecution. Special circumstances may lessen the importance of that interest." Id.

Here, the court found the State's interests were sufficiently serious merely because Mr. Bratton was charged with first degree possession of depictions of a minor engaged in sexually explicit conduct. CP 62. The court found that the crime was "a per se serious offense under RCW 10.77.092."[1] CP 62. Without considering any

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[1] In RCW 10.77.092, the Legislature enumerated certain crimes that are serious offenses per se for the purposes of a Sell hearing. The statute provides:

> (1) For purposes of determining whether a court may authorize involuntary medication for the purpose of competency restoration pursuant to RCW 10.77.084 and for maintaining the level of restoration in the jail following the restoration period, a pending charge involving any one or more of the following crimes is a serious offense per se in the context of competency restoration:
>
> (a) Any violent offense, sex offense, serious traffic offense, and most serious offense, as those terms are defined in RCW 9.94A.030;

other circumstances unique to this case, the court summarily concluded "[h]aving been charged with a serious offense, the State has an important governmental interest to prosecute the defendant for this incident." CP 62-63. By failing to consider whether circumstances of the case mitigated the State's interest, the court erred and violated his constitutional due process rights.

The inquiry of whether the crime is sufficiently "serious" to justify forced medication is fact-specific and "flexible." White, 620 F.3d at 412. Factors the court should consider include the nature and particular facts of the alleged crime. Id. at 413. "Not every serious crime is equally serious." Id. at 419. The Ninth Circuit explained,

> the Sell test does not create any categorical rule precluding courts from determining that a defendant's 'non-property, non-violent' crime is a serious offense. But neither does it preclude courts from considering the

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> (b) Any offense, except nonfelony counterfeiting offenses, included in crimes against persons in RCW 9.94A.411;
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> (c) Any offense contained in chapter 9.41 RCW (firearms and dangerous weapons);
>
> (d) Any offense listed as domestic violence in RCW 10.99.020;
>
> (e) Any offense listed as a harassment offense in chapter 9A.46 RCW;
>
> (f) Any violation of chapter 69.50 RCW that is a class B felony; or
>
> (g) Any city or county ordinance or statute that is equivalent to an offense referenced in this subsection. . . .

> nature of the crime as one of many factors that may be relevant in a particular case.

Ruiz-Gaxiola, 623 F.3d at 695 n.7 (citation omitted).

Thus, courts routinely consider the facts of the individual case in evaluating the government's interest in prosecution. See id. at 695 (noting crime was "neither against persons nor property"); White, 620 F.3d at 419-20 (finding significant that White's alleged activities were nonviolent); Hernandez-Vasquez, 513 F.3d at 919 (examining prior offenses, predatory nature of offenses, and closeness in time of prior offenses to conclude that reentry of deported alien was sufficiently "serious"); Valenzuela-Puentes, 479 F.3d at 1226 (considering "nature or effect of the underlying conduct"); United States v. Dumeny, 295 F.Supp.2d 131, 132 (D. Maine 2004) (concluding facts underlying charge of possession of firearms by person previously committed to mental health institute were not sufficiently serious because defendant was charged "with possession only"); Lopes, 355 Or. at 93 (considering alleged facts of crime which, if proved, established that defendant "subjected a child to a substantial risk of harm").

Besides the facts of the crime, the court should consider other circumstances, such as whether the defendant is likely to reoffend. In White, the court found significant that White was committed to a

mental hospital that "preclude[d] her from certain activities, such as her ability to obtain and own firearms." White, 620 F.3d at 413.

Here, the court erred in failing to consider the individual facts of the case and whether they mitigated the State's interest in prosecuting Mr. Bratton for possession of child pornography. Several facts mitigate the State's interest. First, the offense was nonviolent. There was no suggestion that Mr. Bratton ever committed a hands-on offense against a child or anyone. Also, he had no criminal record, no history of violence, and denied thoughts of hurting anyone. CP 33. Although the creation and dissemination of child pornography harms children depicted in the images, the harm caused by each individual who only possesses an image is indirect and "minor." See Paroline v. United States, __ U.S. __, 134 S. Ct. 1710, 1725, 188 L. Ed. 2d 714 (2014).

The court should also have considered that Mr. Bratton was unlikely to reoffend. He said he thought at the time that it was legal to possess the images. CP 23. Once he was informed that the conduct was illegal, he was unlikely to repeat it. 3/10/14RP 48.

Finally, the State explicitly stated it *had little interest* in prosecuting and imprisoning Mr. Bratton for possession of child pornography given his mental illness. 3/10/14RP 37. Instead, the

State's interest was in rendering him competent so that it could prosecute him in Mental Health Court for *misdemeanor charges* that were dismissed in 2013. Id. Under these circumstances, the court erred in concluding that the State had a sufficiently serious interest in prosecuting Mr. Bratton for possession of child pornography to justify forcibly medicating him. Failure to consider Mr. Bratton's "special circumstances" was a violation of due process. Sell, 539 U.S. at 180.

2. Whether the trial court erred in concluding the charged offense was sufficiently serious *per se* to satisfy the first Sell factor without considering the individual circumstances of the case is not moot because the issue will recur on remand if the State again seeks an order for involuntary medication

When an appellate court agrees with an argument presented on appeal and reverses a case on that basis, it will generally address other issues raised that will possibly recur on remand. See, e.g., State v. Fedoruk, __ Wn. App. __, 339 P.3d 233, 235 (2014) (reversing criminal conviction and addressing other issues raised because "those issues may recur on remand").

Here, the question whether the trial court misapplied the first Sell factor in ordering forced medication will recur on remand if the State seeks to obtain another order authorizing forced medication. If

the Court accepts review and decides that the trial court misapplied the first Sell factor, and another Sell hearing is held on remand, the Court's decision will benefit Mr. Bratton because it will increase the State's burden to demonstrate that involuntary medication is warranted. Thus, the Court can "provide effective relief" and the issue is not moot. See State v. Ross, 152 Wn.2d 220, 228, 95 P.3d 1225 (2004).

3. Even if the issue is technically moot, this Court should address it because whether or not a trial court must consider the individual circumstances of the case in applying the first Sell factor is an issue of substantial public importance on which the lower courts need guidance

Even if this question is technically moot, this Court should still address it. When "a case presents an issue of continuing and substantial public interest and that issue will likely reoccur, [the Court] may still reach a determination on the merits to provide guidance to lower courts." Ross, 152 Wn.2d at 228. Criteria to consider are: "the public or private nature of the question presented, the desirability of an authoritative determination for the future guidance of public officers, and the likelihood of future recurrence of the question." Sorenson v. City of Bellingham, 80 Wn.2d 547, 558, 496 P.2d 512 (1972).

These criteria are met. First, whether a court may simply rely on the list of offenses in RCW 10.77.092(1)(a) in determining that the State's interests are sufficiently "serious" to justify forced medication is undoubtedly a question of public—rather than simply private—concern. Cf. State v. C.B., 165 Wn. App. 88, 94, 265 P.3d 951 (2011), review denied, 173 Wn.2d 1027, 273 P.3d 982 (2012) (concluding that whether the Department of Social and Health Services may petition for the involuntary medication of criminally insane individuals committed to state institutions is "a matter of public concern").

Second, the proper interpretation and application of Sell is an issue that may reoccur in any case where a Sell hearing is held.

Finally, an authoritative determination from this Court is desirable because there is little case law in Washington addressing the proper interpretation and application of the Sell factors. In particular, Mr. Bratton is aware of no published case addressing whether a trial court satisfies the first Sell factor by simply considering whether the charged offense is included within the list of offenses provided in RCW 10.77.092(1)(a). Thus, "because there are no binding court decisions on this issue, a decision on the merits will provide future guidance for public officers." C.B., 165 Wn. App. at 94.

4. This Court should adopt the standard of review adopted by other courts

The significant liberty interests at stake in a Sell proceeding "call for equally significant procedural safeguards" that extend to the standard of review on appeal. Ruiz-Gaxiola, 623 F.3d at 693. The first Sell factor—whether the State's interests are sufficiently "serious"—is a question of law to be given no deference by the reviewing court. Lopes, 355 Or. at 92. "[T]he importance of an asserted governmental interest is an issue that [the reviewing court] is well-equipped to review and evaluate for itself in the first instance." United States v. Hernandez-Vasquez, 513 F.3d 908, 915-16 (9th Cir. 2008). Thus, courts uniformly agree this factor is a question of law reviewed de novo. United States v. Breedlove, 756 F.3d 1036, 1040 (7th Cir. 2014); United States v. Dillon, 738 F.3d 284, 291 (D.C. Cir. 2013); Diaz, 630 F.3d at 1331; Ruiz-Gaxiola, 623 F.3d at 693; United States v. White, 620 F.3d 401, 410 (4th Cir. 2010); Fazio, 599 F.3d at 839; Green, 532 F.3d at 546, 552; United States v. Palmer, 507 F.3d 300, 303 (5th Cir. 2007); United States v. Bradley, 417 F.3d 1107, 1113 (10th Cir. 2005); Gomes, 387 F.3d at 1113-14; State v. Cantrell, 143 N.M. 606, 612, 179 P.3d 1214 (N.M. 2008); Lopes, 355 Or. at 92; State v. Barzee, 177 P.3d 48, 56 (Utah 2007).

The second factor—whether involuntary medication will significantly further the State's interests—is a mixed question of law and fact. The Court should review the factual findings for sufficiency of the evidence and whether those facts meet the legal standard de novo. Cantrell, 143 N.M. at 613; Barzee, 177 P.3d at 57.

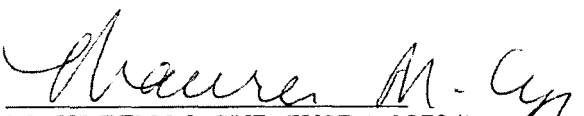
The third and fourth factors—whether less intrusive means are available and whether administration of the drugs is medically appropriate—are questions of fact to be reviewed for sufficient evidence. Ruiz-Gaxiola, 623 F.3d at 693; Cantrell, 143 N.M. at 613.

The ultimate question—whether the facts support the legal conclusion that involuntary medication is warranted—is reviewed de novo. State v. Miller, 181 Wn. App. 201, 206-07, 324 P.3d 791 (2014).

E. CONCLUSION

Lower courts need guidance regarding how to apply the first Sell factor. Because this presents a significant question of constitutional law, this Court should grant review.

Respectfully submitted this 19th day of March, 2015.



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APPENDIX

IN THE COURT OF APPEALS FOR THE STATE OF WASHINGTON

STATE OF WASHINGTON, Respondent, v. WILLIAM BENJAMIN BRATTON, Appellant.	)	DIVISION ONE No. 71651-4-I UNPUBLISHED OPINION FILED: FEB 17 2015

PER CURIAM — William Bratton appeals from the trial court order authorizing involuntary commitment and forced medication. We accept the State of Washington's concession that it failed to establish, by clear and convincing evidence, that involuntary medication is necessary to restore Bratton to competency and that there is no less intrusive treatment likely to achieve substantially the same result. Because the remaining issues raised in Bratton's brief are moot, we decline to address them. Accordingly, we reverse the order authorizing involuntary commitment and forced medication and remand for further proceedings.

Reversed and remanded.

FOR THE COURT:

Spearman, C.J.
Becker, J.
Cox, J.

DECLARATION OF FILING AND MAILING OR DELIVERY

The undersigned certifies under penalty of perjury under the laws of the State of Washington that on the below date, the original document **Petition for Review to the Supreme Court** to which this declaration is affixed/attached, was filed in the **Court of Appeals** under **Case No. 71651-4-I**, and a true copy was mailed with first-class postage prepaid or otherwise caused to be delivered to the following attorney(s) or party/parties of record at their regular office or residence address as listed on ACORDS:

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