NO. 96948-5

SUPREME COURT
OF THE STATE OF WASHINGTON

Court of Appeal Division I No. 76620-1 I

DAVID TILLER and THUY TILLER,

Plaintiffs/Respondents/Cross-Appellants,

v.

STEVEN LACKEY and SALLY LACKEY, husband and wife; and CASEY O'KEEFE and KAREN O'KEEFE, husband and wife

Defendants/Appellants/Cross-Respondents.

ANSWER TO APPELLANTS' PETITION FOR REVIEW AND CONTINGENT PETITION FOR CROSS REVIEW

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TABLE OF CONTENTS

TABLE OF AUTHORITIES

Cases

Rules

Treatises

I. STATEMENT OF THE CASE PERTAINING TO CROSS PETITION.

The trial court found the Tillers had rebutted the presumption of permissive use in this case based on finding that (a) the owners of the plat, as a group and individually, subjectively believed that the use of Lakeview Street by those who owned the cabin lot and the Tiller lot was a matter of right; (b) there was no evidence of a concerted effort by the owners within the plat to restrict others from using Lakeview Street; (c) Tiller intended to continue to use Lakeview Street following construction of the Tiller residence, as evidenced by a 2006 entry in a Whatcom County permit application document, stating that "the site has an existing access via easement (Lakeview St.)," and by Tiller's construction of a garage on the upper part of the property without installing access to the lower part of the Tiller lot; and (d) termination of access via Lakeview Street would "de facto" terminate the express cabin lot easement, which had been used for decades as the sole means of access to the dominant property. Opin. at 13.

The Court of Appeals held these findings to be supported by substantial evidence, *id*., but reversed the trial court on the issue of whether the Tillers had rebutted the presumption of permissive use.

It held that the Tillers and their predecessors had not made a positive assertion to the plat owners that they claimed to use Lakeview Street as a matter of right and did not interfere with the owners' use of the land. Opin. at 13.

II. ASSIGMENTS OF ERROR IN SUPPORT OF CROSS PETITION.

1. Whether a presumption of neighborly accommodation arises where the plat owners believed the use of Lakeview street by the Tillers and their predecessors was a matter of right.

2. Whether a finding of adversity can be sustained in the absence of a physical interference with the owners use of the land.

III. ARGUMENT IN OPPOSITION TO DISCRETIONARY REVIEW.

A. Appellants have not met the requirements of RAP 13.4(b)(1).

1. The Court of Appeals decision is not in conflict with a published decision of this Court with respect to the interpretation or construction of a plat.

Appellants argue the Court of Appeals' recognition of an implied easement is in conflict with the teaching of a line of cases from this Court addressing the interpretation or construction of plats. Namely, that "plats are to be interpreted by the court as any other writing would be, *Cummins v. King County*, 72 Wn.2d 624, 627, 434 P.2d 588 (1967); and that, in construing a plat, "the intention of the

dedicator controls." *Frey v. King County*, 151 Wash. 179, 182, 275 P. 547 (1929).

Appellants cite cases applying these principles where the boundaries of the plat were claimed to be uncertain, either because the boundary lines are incomplete or ambiguous, *Frey, Mueller v. City of Seattle, 167 Wash 67, 8 P.2d 994 (1932), Selby v. Knudson, 77 Wn. App. 189, 890 P.2d 914 (1995); Wilson v. Howard, 5 Wn. App. 169, 486 P.2d 1172 (1971);* or where there is a shortage of land as compared to the plat and the location of the boundary lines. *Dotty v. Freeman*, 55 Wn.2d 306, 347 P.2d 870 (1959). In each of these cases, the court was called upon to determine or confirm the actual boundaries of a plat.

The inquiry in this case did not involve the interpretation of a plat. There is no dispute about the boundaries of the Plat. Rather, the Court of Appeals applied the law of implied easements by reservation, under which the "cardinal consideration" is "the presumed intention of the parties concerned, as disclosed by the extent and character of the user, the nature of the property, and the relation of the separated parts to each other." *Hellberg v. Coffin Sheep Co*., 66 Wn.2d 664, 668, 404 P.2d 770 (1955).

None of the cases cited by appellants hold that an implied easement cannot be recognized if affecting platted land. Indeed, such an argument proves too much, because any implied easement is in derogation of some express grant creating the servient property. If the absence of an express easement in the conveyance of the property trumps all other evidence of the grantor's intent, the doctrine of implied easement by reservation would be a dead letter. But that is not the law. As stated in the Restatement (First) of Property, §476, Comment a (1944):

> An easement created by implication arises as an inference of the intention of the parties to a conveyance of land. The inference is drawn from the circumstances under which the conveyance was made rather than from the language of the conveyance. . . . The inference drawn represents an attempt to ascribe an intention to parties who had not thought or had not bothered to put the intention into words, or perhaps more often, to parties who actually had formed no intention conscious to themselves. (Emphasis added).

Nor does the Court of Appeals Opinion render the dedication of Lakeview Street to the plat owners a "meaningless appendage." The recognition of an implied easement simply extends the beneficial use of that road to an additional lot; Lakeview Street remains a private road closed to all others.

2. The Court of Appeals decision does not conflict with this Court's decision in Brown v. Voss.

When the Provanches dedicated Lakeview Street, they extended it eastward across lot 10 of the plat to the western border of their remaining property (i.e. to the western boundary of the current Tiller Lot), instead of terminating it at the western border of lot 10. The Court of Appeals observed that there was no reason to extend Lakeview Street across Lot 10 if the Provanches intended to limit use of Lakeview Street to the properties in the plat. Opin. at 17. The Court concluded that this evidence, "together with the fact that that portion of their property [what is now the Tiller and Cabin Lots] was landlocked in 1947 – does indicate that the Provanches intended to reserve access to that portion of their remaining property via [Lakeview Street]." *Id.*

The Court of Appeals found further support for this finding in the fact that when the Provanches created and sold the Cabin Lot, they granted an easement across their property (what is now the Tiller Lot) to the boundary of Lot 10 for the purpose of "ingress and egress." The Court noted that without access to Lakeview Street this easement would provide no ingress or egress beyond the confines of the Tiller Lot – rendering it an "easement to nowhere." *Id.* The

Court found these actions by the Provanches supported a finding of their presumed intent to reserve an easement for access to the western portion of their retained land located to the east of the Plat of Georgia Point.

Appellants argue that the Court of Appeals' finding regarding the Provanches' presumed intent is in conflict with this Court's decision in *Brown v. Voss*, 105 Wn.2d 366, 815 P.2d 514 (1986). Not so. In *Brown*, the owner of the dominant estate sought to traverse the servient estate to reach not only the original benefited property, but also a subsequently acquired parcel. *Id.* at 368. The Court held that this was a misuse of the express easement. *Brown* involved the permissible uses of an express easement, not the evidentiary standards giving rise to an implied easement.

The use of Lakeview Street to access the Tiller Lot and the use of the Cabin Lot express easement to access Lakeview Street may be misuses of these easements under the *Brown* case, but that misses the point. The Court of Appeals Opinion does not state that access to and from Lakeview Street is a permissible use of the Cabin Lot easement. To the contrary, it observed that "the creation of the Cabin Lot easement did not itself convey any right to use Lakeview street . . . ." Opin. at 17. Rather, it found that the creation of that

easement with the expectation that it would provide access to Lakeview Street is probative of the presumed intentions of the Provanches in 1947. The Court of Appeal's analysis is not in conflict with the holding announced in *Brown*.

3. The Court of Appeals did not disregard the trial court's findings.

Appellants' charge that the Court of Appeals edited or disregarded the trial court's findings entirely disregards the analytical basis for the decision. The Court of Appeals' determination that an easement of necessity should be implied follows from its conclusion that the relevant date of severance of title occurred in 1947 when the Provanches sold off the Plat of Georgia Point. The Court of Appeals did not edit or disregard the trial court's findings of fact in reaching its decision. Rather, some of the trial court's findings were simply irrelevant to the analysis.

The trial court rejected an easement by necessity stating: "[b]ecause the unity of title and severance date regarding the lots east of the Plat did not exist at the time [1949], the requirements of an implied easement by necessity do not exist. Necessity does exist, but prior use and unity of title do not, and therefore there is no legal basis for an implied easement." Finding 33. Despite this conclusion,

the trial court did enter findings addressing necessity. It found that "[f]rom the time of the creation of the Cabin Lot in 1949 until the time Plaintiffs purchased their lot in 2004, the only vehicular access to Plaintiffs' lot and the Cabin Lot was via Lakeview Street." Finding 13. The court also found that prior to 1976 when the railroad line was abandoned, "access to Northshore Road was not available and not likely to be granted due to the railroad which was in active use. There was no access to the east. The stream and its ravine on the east side of the Cabin Lot prevented it. There was no evidence of access from the east at any time." Finding 25.

Appellants fault the Court of Appeals for failing to reference the portion of Finding of Fact 29 that relates to a driveway the Tillers installed providing access to a garage on the northern extreme of their property. The trial court found the driveway from Northshore Road to the upper level of the garage building provides adequate though not fully convenient access to the Tiller "lot." Finding 29. Although the trial court acknowledged "the need is a greater one than one just of convenience, as there are significant physical and cost restraints on building a direct driveway from Northshore Road to the Tiller house site," Finding 29, it concluded it "need not decide if there is a requirement of direct access to the house instead of the garage

building," *id*., and that "any evidence or legal theories regarding the physical realities on Plaintiffs' lot which interfere with a direct access driven from Northshore Road to Plaintiffs' house are essentially irrelevant." Finding 33.

The Court of Appeals cited and quoted the portion of Finding 29 addressing the necessity for access via Lakeview Street prior to 1976, when "the property comprising the Tiller lot and the Cabin Lot was landlocked by the plat to the west, the railroad to the north, a stream and ravine to the east, and Lake Whatcom to the south." Opin. at 17. The finding supports the Court of Appeals' threshold conclusion that necessity existed at the time of severance. The Court of Appeals quotation was not a matter of editing or disregarding contrary findings; rather, the balance of Finding 29 addressed the presence of necessity after 2004.

The Court of Appeals explicitly addressed the trial court's finding that "most likely the current driveway would be deemed adequate under the law if the court were addressing the issue of necessity." Opin. at 18. But this finding is in no way inconsistent with the Court of Appeals' conclusion that necessity existed at the time of severance in 1947. The Court of Appeals held that changes occurring after severance of title are relevant to the scope of an

easement, but do not negate its existence if the requisite necessity was present at the time of severance. Opin. at 18-19. The Court found that Finding 29 "confirms that necessity still exists, even though the scope of the implied easement may have changed over time." Opin. at 19.

The trial court's finding that the driveway access to "the lot" would "most likely be deemed adequate under the law," does not foreclose finding an easement under *Roediger v. Cullen*, 26 Wn.2d 690, 175 P.2d 696 (1946)[1]. In *Roediger*, the need for the easement was eliminated by the establishment of a public roadway serving the dominant property. *Id*. at 696. At most, *Roediger* stands for the proposition that when there is no degree of necessity remaining due to subsequent events, an easement of necessity is extinguished. That is not the case here.

Moreover, in evaluating the issue of necessity at the time of severance, the Court of Appeals held that the fact the Provances had

[1] The *Roediger* Court's holding that once an easement ceases to be "indispensable," it is extinguished, *Roediger*, 26 Wn.2d at 696, is contrary to more recent cases requiring only reasonable necessity. *Evich v. Kovacevich*, 33 Wn.2d 151, 157, 204 P.2d 839 (1949), *Adams v. Curran*, 44 Wn.2d 502, 509, 268 P.2d 451 (1954). Even the Michigan case *Roediger* relied upon for has been abandoned in favor of the reasonable necessity standard. *See Tomecek v. Bavis*, 276 Mich. App. 252, 275 n. 9, 740 N.W.2d 323 (2007) (recognizing abrogation of *Waubun Beach Ass'n v. Wilson*), *reversed in part on other grounds*, 482 Mich. 484, 759 N.W.2d 178 (2008).

access to a portion of their reserved land to the east of the plat did not negate a finding of necessity with respect to the portion comprising the Tiller lot and the Cabin Lot. Opin. at 16-17. The Court's Opinion notes that an easement may be implied where there is "a reasonable necessity for the easement in order to secure and maintain the quiet enjoyment of the dominant estate." *Id.* at 16. The Court's conclusion is in accord with the rule that the creation of such easement "does not require an absolute necessity, but only a reasonable necessity." *Evich v. Kovacevich*, 33 Wn.2d 151, 157-58, 204 P.2d 839 (1949); *see also Adams v. Cullen*, 44 Wn.2d 502, 509, 268 P.2d 451 (1954) ("If land can be used without an easement, but cannot be used without disproportionate effort and expense, an easement may still be implied in favor of either the conveyor or the conveyee on the basis of necessity alone without reference to prior use.")

The Court of Appeals cited to analogous Washington law on private condemnation actions and to the Restatement of Property for the proposition that necessary rights include "those which are reasonably required to make effective use of the property. . . ., [and] use of all of the normally useable parts of the property for uses that would normally be made of that type of property." Opin. at 16-17

(quoting Restatement (Third) of Property §2.15 cmt. d (2000)). Appellants have not assigned error to this element of the Court of Appeals' analysis.

The same logic and authority the Court of Appeals applied to the Provanche parcel applies equally to the Tiller property. The access described by the trial court, which does not include any vehicular access to the house, is not "adequate under the law," because it is insufficient to secure and maintain reasonable quiet enjoyment of the property.

In Finding 24, the trial court found that because the Provanches terminated the plat at Lot 10 when they could have extended it further east, "there is no presumption that they had an intent to create additional lots to the east of the Plat for which a reservation of an easement would be necessary." Therefore, "the later creation of the Cabin Lot and plaintiffs' lot is not evidence of a plan to reserve access from Lakeview Street at the time of the severance of title." *Id.*

This finding by the trial court hinges on its incorrect legal conclusion that the relevant severance of title occurred upon the creation of the Cabin Lot when unity of title no longer existed. But it is simply irrelevant to the Court of Appeals' analysis. The Court of

Appeals found that necessity arose at the time of severance of the Plat of Georgia Point from the Provanches' remaining property to the east. Opin. at 16. That necessity does not depend upon the Provanches' "intent to create additional lots to the east of the Plat." The Court of Appeals did not find the Provanches intended to reserve an easement in 1949 when they created the Cabin Lot. Rather, it found they intended to reserve an easement in 1947 when the plat was severed from the remaining Provanche property to the east. The creation of the Cabin Lot easement is simply probative of the Provanches' belief that they had an existing right to use Lakeview Street. The Court of Appeals decision is not contrary to Finding 24.

Appellants' argument regarding Finding 25 likewise ignores the Court of Appeals' analysis. The trial court found there was necessity for access to Lakeview Street "to the Plaintiffs' property and to the Cabin Lot, and that existed because of the fact that, with the Cabin Lot creation, it was fully landlocked." Again, the trial court was focused upon the sale of the Cabin Lot as the relevant severance of title. With the creation of the Cabin Lot, access from the portion of the remaining Provanche property that is now the Tiller lot was blocked to the east by the Cabin Lot. But as the trial court made clear in the balance of Finding 25, access to the east was also

impossible due to the geography at the eastern border of the Cabin Lot. Any impediment arising from the creation of the Cabin Lot is irrelevant to the analysis, because the Court of Appeals focused on necessity prior to the creation of the Cabin Lot. The Provanche property was no less landlocked before the creation of the Cabin Lot as it was after its creation.

Appellants' claim that there was no finding of necessity at the time of severance of the plat from the remainder of the Provanche property making up what is now the Tiller and Cabin Lots. Not so. The trial court found that "prior to 1976, the property comprising the Tiller lot and the Cabin Lot was landlocked by the plat to the west, the railroad to the north, a stream and ravine to the east, and Lake Whatcom to the south." Finding 25.

As explained above, the Court of Appeals did not edit or ignore findings of fact contrary to the holdings in *Henroit v. Lewis,* 35 Wn. App. 496, 668 P.2d 589 (1983) and *Valley Construction v. Lake Hills Sewer District,* 67 Wn.2d 910, 410 P.2d 796 (1965). Rather, some findings or portions of findings were rendered irrelevant when viewing the case through the prism of an earlier severance of title.

B. Appellants have not met the requirements of RAP 13.4(b)(2).

Appellants rely upon *Visser v. Craig*, 139 Wn. App. 152, 159 P.3d 453 (2007), for the proposition that an implied easement will not be recognized in the face of "clear evidence of the parties' contrary intent." This begs the question of whether the dedication of Lakeview Street provides such clear evidence. The logic of Appellants' claim is that an implied easement of necessity can never be recognized if the deed, or in this case the Plat, creating the servient property does not explicitly recognize the easement. Stated another way, "implied" easements can only be recognized if they are "expressed" in the deed or plat.

None of the cases cited by Appellants go this far. In *Selby v. Knudson*, 77 Wn. App. 189, 890 P.2d 514 (1995), the court declined to consider extrinsic evidence of intent beyond the plat dedication, holding that "if the plat is unambiguous, the intent as expressed in such plat, cannot by contradicted by parole evidence." *Id*. at 194 (citing *Olsen v. Seattle*, 76 Wash. 142, 136 P. 118 (1913). But *Selby* is among a class of cases involving disputes regarding the true boundaries of the plat. The *Selby* court was called upon to reconcile a discrepancy between the surveyor's map and the dedication. *Selby* was not an implied easement case.

Similarly, Appellants cite to *MacMeekin v. Low Income Hous. Inst., Inc*., 111 Wn. App. 188, 45 P.3d 570 (2002), and *Boyd v. Sunflower Properties*, 197 Wn. App. 137, 389 P.3d 326 (2016), for the proposition that "easements by implication are not favored." Pet. at 15. This does not mean that the Court of Appeals resolution of this case is in conflict with a published decision of the Court of Appeals. Disfavored does not mean prohibited.

Appellants disagree with the resolution of the inquiry into the Provanches' presumed intent, but they have not demonstrated the outcome arose from a misapprehension of the law. Appellants invite this Court to sit as a court of error. This is not a proper basis for review under RAP 13.4(b).

C. Appellants have not met the requirements of RAP 13.4(b)(4).

Appellants appeal to substantial public interest by framing a "majority rule" upon which the Court of Appeals has trespassed: courts "decline to recognize an implied easement in the face of contrary intent of the parties." Pet. at 17. This uncontroversial formulation begs the question of how intent is determined. Appellants rely upon out-of-state cases because their outcomes align with appellants' interest. But these case outcomes are dictated by their facts and not by the application of some "majority rule" that

is contrary to the principles applied by the Court of Appeals in this case.

For example, in *White v. Landerdahl,* 625 P.2d 1145 (Mont. 1981), the court observed that "implied easements rest upon the intent of the parties gathered from the evidence." The outcome in *White* turned upon evidence that "defendants were quite adamant during the presale negotiations that they did not want any roadway easement to cross their property . . . ." *Id*. Thus, the court considered evidence that is outside the scope of inquiry dictated by the "majority rule" advocated by appellants. There was no equivalent evidence of intent in this case.

In *Jackson v. Nash*, 866 P.2d 262 (Nev. 1993), the court weighed evidence regarding the interactions of the parties at the time of severance and found that no reasonable inference could be found that the grantor intended to reserve an easement. *Id.* at 1212. However, the principal basis for the court's decision was that there was an "acceptable and practical" alternative means of access to the dominant estate. *Id*. at 1211-12.

In *Murphy v. Burch*, 205 P.2d 289 (Cal. 2009), the case turned upon whether an implied easement by necessity is available when

the federal government – with the power of eminent domain -- owned the land at the time of severance. *Id*. at 393.

IV. ARGUMENT IN SUPPORT OF CONTINGENT CROSS-PETITION FOR REVIEW.

Should the Court grant Appellants' petition, the Tillers respectfully request the Court also review the Court of Appeals' reversal of the trial court's finding of a prescriptive easement.

The evidence of accommodation or acquiescence consisted of testimony that there were friendly relations in the neighborhood. By contrast, there was evidence that Lakeview Street was considered by the owners to be a public street or easement open to all users as a matter of right. The Court of Appeals found that the trial court's finding on this issue was supported by substantial evidence.

The Court of Appeals discounted this evidence on the ground that the plat residents' subjective beliefs are not relevant. Opin. at 13 (citing *Dunbar v. Heinrich*, 95 Wn.2d 20, 27, 622 P.2d 812 (1980) ("[A]dversity is to be measured by . . . the objectively observable acts of the user and the rightful owner.") The Tillers do not dispute this proposition as it applies to adversity, but assert that this evidence should be considered in the context of whether an inference of

neighborly accommodation was proper in this case, and if not, whether the trial court correctly found a presumption of permissive use. If the owners considered use of Lakeview Street a matter of right they cannot have been making an accommodation or acquiescing to the use of Lakeview Street by the Tillers' predecessors in title.

The facts of this case also raise the issue of what constitutes "interference" with the owner's use of land under *Gamboa v. Clarke* sufficient to rebut a presumption of permissive use.

The trial court held that "[a]dverse use need not be physically hostile, nor the equivalent of blocking the use by the servient property owner." Finding 51. The court concluded that adversity is established when the use is "contrary to the legal rights of the servient estate [. . . .] and is carried on in such a way as to be consistent with the actual use of that right." *Id*. The trial court found that the granting of the Cabin Lot easement "combined with actual use" of the easement to access Lakeview Street provided added significance to the potential impact of the publicly recorded easement. (Finding 47). Appellants argued that a recorded document gives notice only as to matters within its chain of title. But the recorded easement was not the only public record of the easement and implications of the easement.

There have been two lawsuits involving the easement, one of which, in 1959, went to trial and resulted in filed findings of fact and a judgment reciting that the easement was for the purpose of ingress and egress from the Cabin Lot. Ex. 68. At that time, the only such ingress and egress was via Lakeview Street, and it was in fact being used in that manner. Finding 25.

As the trial court observed, the Cabin Lot easement "is contrary to the interest of the lot owners in the Georgia Point Plat if it includes or implicates use of Lakeview Street against their interest. This would be adverse to their legal interest." Finding 48.

This Court should grant Respondents' cross-petition pursuant to RAP 13.4(b)(4), and determine whether "adversity" requires a physical interference with the owner's use of the land, or whether a broader inquiry, such as that employed by the trial court, is permissible in determining adversity and interference.

RESPECTFULLY SUBMITTED this April 12, 2019.

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CERTIFICATE OF FILING AND SERVICE

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