

FILED  
SUPREME COURT  
STATE OF WASHINGTON  
7/25/2019 9:54 AM  
BY SUSAN L. CARLSON  
CLERK

No. 97395-4

IN THE SUPREME COURT FOR THE  
STATE OF WASHINGTON

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SANDRA FERGUSON and THE FERGUSON FIRM, PLLC,

Petitioners,

vs.

LAW OFFICE OF BRIAN J. WAID, PLLC, *et al*,

Respondents.

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*PRO SE* RESPONDENT'S MOTION TO STRIKE PETITIONER'S  
UNAUTHORIZED FIRST AND SECOND "AMENDED" PETITIONS  
FOR REVIEW, IMPOSE SANCTIONS ON PETITIONER PURSUANT  
TO RAP 1.1(d) AND RAP 18.9(a), AND EXTEND THE DUE DATE  
FOR RESPONDENT TO FILE AN ANSWER TO THE "AMENDED"  
PETITION UNTIL AFTER THE COURT DECIDES THIS MOTION

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Brian J. Waid  
WSBA No. 26038  
WAID LAW OFFICE, PLLC  
5400 California Ave. S. W., Ste D  
Seattle, Washington 98136  
Respondent/*Pro Se* Plaintiff-in-  
Counterclaim in Trial Court

## **I. Identity of Respondent**

Respondent Brian J. Waid was the defendant and plaintiff-in-counterclaim in the trial court, and the respondent/cross-appellant in the Court of Appeals.<sup>1</sup> Respondent's counterclaims arose out of his fee agreement for legal services provided to Petitioner Ferguson. Division I re-aligned the parties, thus designating Waid as the Appellant and Ferguson as the Respondent, after it had dismissed Ms. Ferguson's appeal for failure to file her Opening Brief.<sup>2</sup>

## **II. Decision Below**

Not applicable.

## **III. Issues Presented for Review**

1. Should the Court strike Ferguson's 50-page "Amended" Petition for Review as unauthorized, violative of multiple Court rules, and raising issues resolved by this Court in 2013, particularly considering

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<sup>1</sup> Ferguson previously sought review of this case in Supreme Court Case nos. 91426-5, 93808-3, 95701-1. The Court denied review in each instance.

<sup>2</sup> Respondent Waid appeared *pro se* in his capacity as plaintiff-in-counterclaim in the trial court and relative to those same issues on appeal in Division I. Because Ms. Ferguson's revised Petition for Review appears to only address issues related to his fee counterclaims, Respondent files this Motion to Strike the revised Petition for Review *pro se*. Kathleen Nelson and Sarah Demaree Macklin represented Waid on all other issues in his role as defendant in the trial court and respondent/cross-appellant in Division I.

Ferguson's past history of rules violations and the fact that Respondent had already filed his Answer to Ferguson's original Petition for Review?

**Answer: Yes.**

2. Should the Court impose sanctions against Petitioner, including monetary and non-monetary sanctions (to protect the Court and its staff as well as Respondent and other litigants), pursuant to RAP 18.9(a) and RAP 1.1(d), considering that her first and second "Amended" Petitions for Review are: (a) unauthorized; (b) frivolous on multiple grounds; (c) violate RAP 13.4 and RAP 10.4 in multiple respects, and (d) were filed for the improper purposes of furthering Petitioner's campaign of harassment of Respondent<sup>3</sup> and delaying enforcement of the Division I mandate against her relative to Respondent's counterclaims? **Answer: Yes.**

3. Should the Court extend the due date for Respondent to file his Answer to Ferguson's "Amended" Petition for Review pending a decision on this motion, pursuant to RAP 18.8(a)? **Answer: Yes.**

#### **IV. Statement of the Case**

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<sup>3</sup> See, *Ferguson v. Waid*, 2019 WL 6040174 (W.D. Wash. 11/19/2018). Respondent's Appendix includes a copy of that Court's Findings of Fact and Conclusions of Law.

Sandra Ferguson seeks review of the decision issued by Division I of the Court of Appeals. Ms. Ferguson filed her Petition for Review on July 8, 2019 (the last possible date for filing). The Petition is seven (7) pages long, single-spaced, and identifies three issues for review: (1) whether the Court of Appeals should have considered Waid's appeal of the trial court denial of summary judgment on his account stated cause of action; (2) whether *res judicata* precluded Waid's counterclaim for fees, and; (3) whether partial summary judgment is appropriate on an account stated cause of action when the former client has alleged contingent, unliquidated claims against the attorney. The original Petition for Review did not cite a specific section of RAP 13.4 that would warrant review.

**On July 15, 2019, Respondent filed his Answer to Ferguson's original Petition for Review.** The Answer asks for sanctions against Ms. Ferguson because her original Petition was frivolous and is [Ans. pp. 15-17]:

. . .replete with errors that include misspellings, odd spacing,

violations of RAP 10.4(a),<sup>4</sup> and an incomplete sentence (p. 4) that reads “The effect of the Court of Appeals Decision is to \_\_\_\_\_.” Furthermore, the copy of the Petition for Review, at least as served on Respondent, also fails to include the Appendix required by RAP 13.4(c)(9) and, as of this writing, Petitioner has not paid the filing fee for the Petition for Review.

The next day, July 16, 2019, this Court’s Clerk granted Ms. Ferguson until July 24, 2019 in which to pay the filing fee for the Petition for Review<sup>5</sup> and directed her to “add page numbers” to her original Petition and re-file it. The Court Clerk did *not* grant Ms. Ferguson carte blanche authority to file an entirely new petition.

On July 24, 2019, Ms. Ferguson filed a 50-page *first* “Amended Petition” which identifies the following issues presented for review:<sup>6</sup>

(1) “are the lower courts still bound by the *Ross* rule requiring them to narrowly construe the attorney-lien statute, regardless of the 2004

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<sup>4</sup> Ferguson’s original Petition for Review also violates RAP 10.4(a)(2) in that it is not double-spaced, and RAP 13.4(c)(2) in that it does not include the Tables required by that Rule. Respondent cannot determine whether the Petition meets that Rule’s margin and font requirements. The pages are not numbered. Ferguson is an experienced attorney who has appeared in this Court on many occasions. Her RAP 10.4(a) and RAP 13.4 violations provide further support for the conclusion that Ferguson filed the Petition to delay resolution of Respondent’s counterclaims on remand to the trial court and to further her campaign of harassment against Respondent. Appendix, **Ex. C** at \*9.

<sup>5</sup> Respondent is unaware whether Ms. Ferguson paid the filing fee on time.

<sup>6</sup> Ms. Ferguson uses approximately a full page to identify each of the “Issues Presented for Review.” Respondent has therefore tried to succinctly state the two issues purportedly presented; however, as stated the second issue is virtually indecipherable.

amendments?”, and; (2) whether partial summary judgment is appropriate on an account stated cause of action when the former client has alleged contingent, unliquidated claims against the attorney.

Incredibly, overnight on July 24, 2019, Ferguson filed a *second* “Amended” Petition for Review, consisting of sixty-six (66) pages of text.<sup>7</sup> This second “Amended” Petition for Review identified four (4) Issues Presented for Review.

## V. ARGUMENT

### 1. The Court Has Not Authorized Ferguson’s First and Second “Amended” Petitions for Review, Both of Which Violate RAP 13.4(a) and 13.4(d)

On July 16, after Respondent had filed his Answer to Ferguson’s Petition for Review, the Court Clerk authorized Ms. Ferguson to number the pages of her original Petition for Review. The Court Clerk did not authorize her to file an entirely new Petition for Review.

More significantly, by first filing a 7-page Petition for Review and then filing a 50-page “Amended” Petition for Review *after* the Respondent

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<sup>7</sup> Although the extent of revisions between Ferguson’s 50-page first “Amended” Petition and her 66-page second “Amended” Petition are not readily identifiable, they do *not* appear limited to just correcting the erroneous margins contained in the first “Amended” Petition for Review

has already answered the Petition, Ferguson effectively circumvents and nullifies the RAP 13.4(a) requirement that Petitions for Review must be filed within 30 days *and* RAP 13.4(d) which does *not* allow a reply in support of a Petition for Review except to respond to *new* issues raised in the Answer. Indeed, Ferguson’s *second* “Amended” Petition for Review, for example, appears to expressly reply to Respondent’s Answer relative to the Ferguson’s economic duress argument.<sup>8</sup> No Rule of this Court authorizes the relation back in time of such grossly abusive “amended” pleadings; nor does any such rule authorize the filing of multiple “corrected” Petitions for Review without leave of Court.

Ferguson’s practice is also fundamentally unfair to Respondent considering that he had properly filed his Answer to Ferguson’s original Petition for Review nine (9) days *prior to* the filing of Ferguson’s “Amended” and *second* “Amended” Petitions for Review.

**2. Ferguson’s “Amended” Petitions for Review Violate RAP 13.4(e) and (f) and RAP 10.4(a)(1).**

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<sup>8</sup> Respondent’s Answer explained that Ferguson had abandoned the “economic duress” argument in the Court of Appeals. Ans., pp. 10-11. Ferguson’s responds to that argument in her *second* “Amended” Petition at pp. 61-65.

RAP 13.4(f) provides that a Petition for Review may *not* exceed 20 pages in length. Ferguson’s first and second “Amended” Petitions for Review significantly exceed the 20-page limit. Ferguson’s *first* “Amended” Petition also appears to use 1-inch margins on both sides, thus violating RAP 13.4(e) and RAP 10.4(a)(1) which require a 2-inch margin on the left side and a 1 ½ inch margin on the right side.

These are not innocent errors on the part of Ms. Ferguson. She is eminently aware of this Court’s procedural requirements.<sup>9</sup>

**3. The Court Should Sanction Ferguson for Having Filed Her Unauthorized, 50-Page First “Amended” Petition for Review, as Well as for Filing Her 66-Page Second Amended Petition for Review**

RAP 18.9(a) authorizes an appellate court to impose terms or compensatory damages against a party who files a frivolous appeal. RAP 18.9(a) applies to the Petition for Review in this Court. RAP 1.1(d).

More specifically, the Federal Court found, after trial, that Ms. Ferguson’s attorney (Emily Sharp Rains) promised that Ferguson’s

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<sup>9</sup> For example, in Supreme Court Case no. 93808-3, Ferguson repeatedly filed “amended” or “corrected” pleadings in the Court of Appeals and this Court. See Appendix attached. In *Ferguson v. Waid*, Supreme Court Case no. 95701-1, the Court accepted Ferguson’s 25-page Petition for Review because the Clerk determined that the Petition might fall within the 20-page limit but for Ferguson’s use of the incorrect margins. In Supreme Court case no. 91426-5, Ferguson tried to withdraw her appeal and have Waid’s cross-appeal dismissed, after four months of extensive motion practice. In *O’Brien v. Carder*, Supreme Court Case no. 944856, Ferguson had to file an amended Petition for Review—which was still 25 pages long after amendment. These are only a few examples—many more could be provided.



goal was “dragging Mr. Waid’s name through the mud.” Resp. Ans., Appendix C, p. 024 (FOF 37). Ferguson also told Respondent that he “deserved to suffer” and “this is not over, Brian.” *Id.* (FOF 39). Ferguson also posted “client reviews” on the internet, which the Federal Court found to be untrue and defamatory. *Id.* at p. 025-028 (FOF 45-46; COL 3-13). The Federal Court further found that “[o]ver the past four years, Ms. Ferguson has engaged in a course of conduct specifically aimed at harassing Mr. Waid.” *Id.* at p. 027-028 (COL 14-21).

Although the Federal Court did not enjoin Ms. Ferguson from filing the Petition for Review in this pending case, that does not prevent this Court from imposing sanctions against her for having filed a frivolous Petition for Review, followed by a patently improper 50-page *first* “Amended” Petition for Review, which she followed within hours with a 66-page *second* “Amended” Petition for Review.

Beyond its lack of merits, Ferguson’s Petition for Review is replete with errors. See, Resp. Ans., p. 16 and n. 11. Ferguson’s *first* “Amended” Petition for Review similarly omitted the requisite Tables [RAP 13.4(c)(2)] and Appendix [RAP 13.4(c)(9)]. Both the *first* and *second* “Amended” Petitions for Review also argue at great length<sup>10</sup> that

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<sup>10</sup> Ferguson asserts that Division I erred in its 2013 decision as the *first* “Issue Presented for Review” in both her first and second “Amended” Petitions for Review. See further, *e.g.*, pp. 1-4 of Ferguson’s second “Amended” Petition.

Division I erred in *The Ferguson Firm v. Teller & Associates*, 178 Wn. App. 622, 316 P.3d 509 (2013). However, this Court denied review of *The Ferguson Firm v. Teller & Associates* in July **2014**. Supreme Court case no. 90140-6. Ferguson's assignment of error to, and her extended discussion of, that purported are therefore completely irrelevant to this appeal and frivolous.

**3. The Court Should Grant Respondent an Extension of Time to Answer Petitioner's First and/or Second "Amended" Petitions for Review Until Such Time as the Court Rules on this Motion.**

RAP 18.8(a) authorizes the Court to grant appropriate extensions of time. In this particular instance, Respondent has already answered the original Petition for Review. As a matter of fundamental fairness, Respondent should not be required to incur the significant time and expense of preparing an Answer to either the first or second "Amended" Petitions for Review, until after the Court rules on this Motion to Strike and determines whether he must file a second Answer and, if so, to which "Amended" Petition for Review.

Respondent thus requests an open-ended extension of time pending that decision by the Court.

**VI. CONCLUSION**

For these reasons, Respondent requests that strike Ms. Ferguson's

first and second “Amended” Petitions for Review as unauthorized. Ms. Ferguson’s conduct in this Court requires severe sanctions. In addition to monetary sanctions, Respondent suggests that the Court consider non-monetary sanctions in the form a vexatious litigant (or similar such) designation to protect not only Respondent and other litigants, but to protect this Court and its staff from similar abusive conduct by Ms. Ferguson in the future. Finally, Respondent requests an extension of time so that he will not be required to prepare an Answer to the either the first or second “Amended” Petitions for review until a reasonable time after the Court decides this Motion.

DATED: July 25, 2019.

WAID LAW OFFICE, PLLC

BY: /s/ Brian J. Waid  
BRIAN J. WAID  
WSBA No. 26038  
5400 California Ave. SW, Suite D  
Seattle, Washington 98136  
Telephone: 206-388-1926  
Email: [bjwaid@waidlawoffice.com](mailto:bjwaid@waidlawoffice.com)  
*Pro Se* Respondent/Plaintiff-in-  
Counterclaim in Trial Court

**PROOF OF SERVICE**

I hereby certify that on this 25th day of July, 2019, I caused a copy of the foregoing Respondent's Motion to Strike and for other relief to be delivered to Petitioners and Respondents, through their attorneys on the following in the manner indicated below:

Counsel for Petitioners:	<input type="checkbox"/> U.S. Mail
Sandra L. Ferguson	<input type="checkbox"/> by hand
600 First Avenue	
Pioneer Building	
Seattle, Washington 98104	<input checked="" type="checkbox"/> ECF Delivery
fergusonsandra459@gmail.com	

Counsel for Respondents:	<input type="checkbox"/> U.S. Mail
Kathleen A. Nelson	<input type="checkbox"/> Hand
Sarah Demaree Macklin	<input checked="" type="checkbox"/> ECF Delivery
Lewis Brisbois Bisgaard & Smith, LLP	
2101 Fourth Avenue, Suite 700	
Seattle, Washington 98121	
Kathleen.Nelson@lewisbrisbois.com	

Original e-filed with:  
Washington Supreme Court  
P.O. Box 40929  
Olympia, Wash. 98504-0929

Dated: July 25, 2019

WAID LAW OFFICE, PLLC

BY: /s/ Brian J. Waid  
BRIAN J. WAID  
WSBA No. 26038

## **APPENDIX**

### **EXEMPLAR SAMPLE OF COMMUNICATIONS ILLUSTRATING MS. FERGUSON'S PROPENSITY FOR FILING "AMENDED," "CORRECTED," AND OVERLENGTH APPELLATE PLEADINGS**

November 16, 2016

Hon. Richard D. Johnson  
Court Administrator/Clerk  
Court of Appeals, Division I  
One Union Square  
600 University Street  
Seattle, WA 98101-4170

RE: Supreme Court No. 93808-3—COA No. 74512-3-1 (*Ferguson et al v. Waid, et al.* 14-2-29265-1 SEA)

Dear Mr. Johnson:

I am the attorney for Sandra Ferguson and her law firm in the above-referenced case. On November 5, 2016, Appellants, *Ferguson et al* filed a Motion for Discretionary Review of Interlocutory Decision which had a Table of Contents and Appendix thereto.

The Motion was filed with the Supreme Court by e-mail, as permitted by the Court's rules. However, we were subsequently notified by the Court that the Appendix was too large to be accepted as filed by e-mail, and would have to be sent by U.S. mail. In the meantime, it was discovered that certain corrections needed to be made to the original Table of Contents and Appendix which had already been timely filed with this Court. Therefore, the appropriate corrections were made before the Motion (in its entirety) was mailed to the Supreme Court. But no changes were made to the original Motion or brief which we filed with this Court and the Supreme Court; the only changes were to the documents attached to the Motion.

Enclosed, please find copies of the documents which were mailed to the Supreme Court today, in support of Ferguson's Motion for Discretionary Review, filed on November 4, 2016.

- (1) Letter from Emily Rains to Honorable Susan Carlson, dated November 15, 2016.
- (2) Conformed Copy of Motion for Discretionary Review filed November 4, 2016.
- (3) Revised Table of Contents to Appendix and Certificate of Service.
- (4) Tabs 1, 2, 3, 4, 5.
- (5) Appendix (Exhibits A-N).
- (6) Revised Certificate of Service of Sandra Ferguson and Corrected Certificate of Service of Emily Rains.

The enclosed items (1)-(5), listed above, are being served on the Respondent, Brian Waid, and his counsel of Record, today, by e-mail (see Certificate of Service attached to Revised Table of Contents).

Please do not hesitate to contact me if you have any questions or concerns.

Sincerely,

**Emily Rains**  
600 First Avenue  
Seattle, WA 98104  
Tel. 206-778-1330  
[mail@emilyrains.com](mailto:mail@emilyrains.com)

Emily Rains  
Emily Rains

Cc: Emmelyn Hart, Sarah Demaree, Kathleen Nelson, Brian Waid (via e-mail).

**Emily Rains**  
600 First Avenue  
Seattle, WA 98104  
Tel. 206-778-1330  
[mail@emilyrains.com](mailto:mail@emilyrains.com)

## Brian Waid

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**From:** Sandra Ferguson <sandra@sfergusonlaw.com>  
**Sent:** Thursday, April 20, 2017 5:02 PM  
**To:** Kathleen.Nelson@lewisbrisbois.com  
**Cc:** Emily Sharp Rains; bjwaid@waidlawoffice.com  
**Subject:** FW: Supreme Court No: 93808-3 - Sandra L. Ferguson, et al. v. LawOffice of Brian J. Waid, et al.  
**Attachments:** Binder1.Motion to Modify.FINAL.pdf

Kathleen,

Here you go. This is what Emily sent to Court, which we are asking the Court to disregard.

Waid was copied on the e-mail and attachment that I sent to the Court and to you.

Sandra

**From:** mail@emilyrains.com [mailto:mail@emilyrains.com]  
**Sent:** Thursday, April 20, 2017 4:09 PM  
**To:** supreme@courts.wa.gov  
**Subject:** Supreme Court No: 93808-3 - Sandra L. Ferguson, et al. v. LawOffice of Brian J. Waid, et al.

Dear Supreme Court,

Please see attached Motion to Modify.

Kind regards,

Emily



## Brian Waid

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**From:** mail@emilyrains.com  
**Sent:** Monday, April 24, 2017 11:40 AM  
**To:** Nelson, Kathleen  
**Cc:** 'Brian J. Waid' (bjwaid@waidlawoffice.com); Sandra Ferguson  
**Subject:** FW: Ferguson v. Waid, Supreme Court No. 93808-3  
**Attachments:** AMENDED.Motion to Modify to File 4-23-16.REVIEW by ER.docx

Hi Kathleen,

Please see attached.

Emily

**From:** [mail@emilyrains.com](mailto:mail@emilyrains.com)  
**Sent:** Monday, April 24, 2017 12:25 PM  
**To:** [supreme@courts.wa.gov](mailto:supreme@courts.wa.gov)  
**Subject:** Ferguson v. Waid, Supreme Court No. 93808-3

Dear Ms. Carlson:

Please accept the attached (amended) Motion to Modify Commissioner's Ruling Denying Discretionary Review. The original Motion was filed on Thursday, April 20, 2015. Unfortunately, the wrong document was filed. Therefore, please accept the attached Motion in its stead.

The Exhibits which are listed in the Appendix to this Motion needed to be sent by mail to the Supreme Court because the electronic file would have been too large to file by e-mail. The opposing parties and their counsel are being served with the Appendix by messenger or other feasible delivery methods.

Please do not hesitate to contact me if the Court has any questions or concerns.

Thank you for your attention to this matter.

Kind regards,

Emily Rains



## Brian Waid

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**From:** mail@emilyrains.com  
**Sent:** Monday, April 24, 2017 11:54 AM  
**To:** supreme@courts.wa.gov  
**Cc:** Nelson, Kathleen; 'Brian J. Waid' (bjwaid@waidlawoffice.com); Sandra Ferguson  
**Subject:** Ferguson v. Waid, Supreme Court No. 93808-3  
**Attachments:** Supreme Court.Motion to Modify.FINAL.pdf

Hi Ms. Carlson,

Please disregard my last email.

Attached is the final motion. Can you please disregard my earlier email. Again, the appendix needed to be mailed so you should receive this information shortly.

Kind regards,

Emily

## Brian Waid

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**From:** mail@emilyrains.com  
**Sent:** Monday, April 24, 2017 12:33 PM  
**To:** Nelson, Kathleen; 'Sandra Ferguson'  
**Cc:** 'Brian J. Waid' (bjwaid@waidlawoffice.com)  
**Subject:** RE: Ferguson v. Waid, Supreme Court No. 93808-3  
**Attachments:** LB-Logo\_7c9c5bd0-0a1e-47b8-a3b1-a4b5cdfed8fa.png

Yes, please disregard the email I sent to the court earlier today. Please accept the version I sent to the Supreme Court at 11:54am today (the last attachment).

Thanks Kathleen,

Emily

**From:** Nelson, Kathleen  
**Sent:** Monday, April 24, 2017 1:07 PM  
**To:** 'mail@emilyrains.com'; 'Sandra Ferguson'  
**Cc:** 'Brian J. Waid' (bjwaid@waidlawoffice.com)  
**Subject:** RE: Ferguson v. Waid, Supreme Court No. 93808-3

I am very confused. SO, disregard everything up to your 11:54 am email to the court--- as that is the only one for court to consider? Please confirm.

---

**From:** mail@emilyrains.com [mailto:mail@emilyrains.com]  
**Sent:** Monday, April 24, 2017 11:56 AM  
**To:** Nelson, Kathleen; 'Sandra Ferguson'  
**Cc:** 'Brian J. Waid' (bjwaid@waidlawoffice.com)  
**Subject:** RE: Ferguson v. Waid, Supreme Court No. 93808-3

Sorry about that Kathleen. You should have received the correct version.

Thanks,

Emily

**From:** Nelson, Kathleen  
**Sent:** Monday, April 24, 2017 12:48 PM  
**To:** 'Sandra Ferguson'; Emily Sharp Rains  
**Cc:** 'Brian J. Waid' (bjwaid@waidlawoffice.com)  
**Subject:** RE: Ferguson v. Waid, Supreme Court No. 93808-3

Once you all figure it out, let me know.

**WAID LAW OFFICE**

**July 25, 2019 - 9:54 AM**

**Transmittal Information**

**Filed with Court:** Supreme Court  
**Appellate Court Case Number:** 97395-4  
**Appellate Court Case Title:** Sandra L. Ferguson et al. v. Law Office of Brian J. Waid et al.

**The following documents have been uploaded:**

- 973954\_Motion\_20190725095207SC258541\_0391.pdf  
This File Contains:  
Motion 1 - Strike  
*The Original File Name was Waid.Motion to Strike Revised Petition for Review.pdf*

**A copy of the uploaded files will be sent to:**

- fergusonsandra459@gmail.com
- kathleen.nelson@lewisbrisbois.com
- mail@emilyrains.com
- sandra@slfergusonlaw.com
- sarah.macklin@lewisbrisbois.com
- tami.foster@lewisbrisbois.com
- vicki.milbrad@lewisbrisbois.com

**Comments:**

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Sender Name: Sarah Hidalgo - Email: shidalgo@waidlawoffice.com

**Filing on Behalf of:** Brian J Waid - Email: bjwaid@waidlawoffice.com (Alternate Email: )

Address:  
5400 California Ave SW  
Suite D  
Seattle, WA, 98136  
Phone: (206) 388-1926

**Note: The Filing Id is 20190725095207SC258541**