No. 98280-5

SUPREME COURT
OF THE STATE OF WASHINGTON

BONNIE I. MEYERS, as personal representative of the estate of GABRIEL LEWIS ANDERSON, a deceased minor, age 15, and on behalf of the beneficiaries of the estate; and BRANDI K. SESTROM and JOSHUA ANDERSON, individually;

Respondents,

v.

FERNDALE SCHOOL DISTRICT, a political subdivision of the State of Washington;

Petitioner,

and

WILLIAM KLEIN and JANE DOE KLEIN and the marital community comprised thereof;

Defendants.

ANSWER TO PETITION FOR REVIEW

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A. INTRODUCTION

The petition for review filed in this case by the Ferndale School District ("District") is remarkable for its willingness to ignore, and actually distort, the facts in this case, and to ignore the Court of Appeals' opinion.

The trial court determined that the District owed Gabriel Anderson a duty of care, but ruled that the particular events leading to Gabriel's death were unforeseeable as a matter of law. Recognizing the weakness of its argument on duty, the District shifted its focus of the case at Division I from the trial court's duty decision to legal causation, an issue the trial court never even reached.[1] It was not surprising that the District did this because foreseeability is a fact question for the jury and obvious fact questions on foreseeability were present here. Moreover, the trial court applied the wrong standard for foreseeability, believing that the specific accident had to be foreseeable rather than the events being within the field or zone of danger.

In abandoning duty/foreseeability and relying essentially on its legal causation argument, the District ignored the Estate's well-qualified

[1] The District nowhere in its petition alludes to the fact that its entire theory in the case morphed on appeal. The trial court did not decide this case on the basis of causation, as *neither* cause-in-fact or legal causation was addressed substantively *anywhere* in the court's written ruling. CP 569-70. Rather, it decided the case on its erroneous interpretation of foreseeability in the duty context, ruling on that factual issue as a matter of law. *Id*.

experts who testified on the District's duty and causation. Division I understood that foreseeability was a fact issue, that fact issues were present as to proximate cause, and, under this Court's well-developed analysis of legal causation, the Estate's claims against the District were not barred.

The District fails in its petition, despite its distortion of the record and its attempt to paint the facts in a light most favorable to it, to establish that Division I's opinion incorrectly treated causation, now having conceded it owed Gabriel a duty of care and fact questions were present as to foreseeability. Review is not merited. RAP 13.4(b).

B. STATEMENT OF THE CASE

Ignoring Division I's clear recitation of the facts and procedure in the case, op. at 2-4, the District's Statement of the Case is *replete* with argument, and misstatements of fact unsupported by citations to the record, or glaring omissions of what was in the record. Pet. at 3-5. Critically, the District simply ignores the controlling rules relating to review. As this Court is well aware, on summary judgment, this Court must construe all facts and reasonable inferences from those facts in a light most favorable to the Estate, credibility issues are for the jury, and where experts differ on key factual points, a genuine fact issue is present for the jury. *See generally*, Appellants' Br. at 10-11. Instead, throughout

its petition, it offers facts in a light most favorable to it.

The material facts in the case, contrary to the District's assertion in its petition at 3, *are* in dispute. That's exactly why summary judgment was inappropriate here. There were distinctly different expert opinions on key issues, not even acknowledged *anywhere* in the District's brief. *Numerous* fact issues were present here on the key issues.

The District claims in its petition at 4 that the ill-fated excursion here was not subject to the District's field trip policy. That was hotly contested below. Policy 2320 required a teacher, among other requirements, to:

- Submit a field trip request form to the principal or designee a minimum of four weeks prior to the event;
- Following principal/designee approval, send parents and guardians notification/information letter and permission form as soon as possible, but no later than three weeks prior to the scheduled activity or trip. Notification and permission form include detailed information regarding goals, destination, date, departure and return times, transportation, appropriate dress, anticipated expenditures, meals, safety and behavior standards, telephone numbers, and a request for any health/medical-related information;
- Make provision to ensure that students are not left at an activity or trip site;
- Make plans for keeping groups together as appropriate;

- Provide the principal with a list of students and chaperones taking part in the activity.

CP 461-62. The principal or designee then must:

- Review and approve or disapprove the field trip request as soon as possible, but no less than three weeks prior to the event. "Approval" requires that the principal/designee will have confirmation for all aspects of the field trip, including financial, transportation and student health factors;

- Ensure that prior notification to parents or guardians is disseminated and that student permission slips have been obtained;

- In the event that a field trip opportunity becomes available in a way that does not fit the above timelines, the principal/designee may approve the field trip if all issues (e.g., financial, transportation, student health) are fully addressed.

CP 462-63. The District's Mark Hall testified that a "field trip" and "excursion" were synonymous terms. CP 509. Assistant Superintendent Scott Brittain said Policy 2320 and the applicable procedures would apply to excursions taken by District students. CP 459.

When the District claims in its petition at 4 that Ritchie had permission from District administration for this excursion, that is *false*. *See* Appellants' Br. at 6 n.3. When the District claims no District witness testified that parental permission for excursions was necessary, *id*. at 4, it *ignores* the testimony of former Windward High School PE teachers Rick Brudwick and Jill Iwasaki, both of whom required parental permission

before off-campus excursions could take place. Appellants' Br. at 4-5. When it claims that Ritchie's impromptu excursion furthered an educational purpose, pet. at 3-4, that, too, was hotly contested. Dr. Dennis Smith said that was not true; discussion of summer plans was hardly an "educational purpose." CP 352. When the District claims (as it does repeatedly in its brief) that Gabriel and other students regularly walked on the same street, pet. at 13-14, that *distorts* the different physical characteristics of the portion of W. Smith Road where Ritchie took the students and the walk to Greene's Corner store. Appellants' Br. at 32 n.25. The store is accessed by a crosswalk and is in lower speed school zone than the 40 mph zone where Gabriel was struck. *Id.*

Finally, and perhaps most egregiously, when the District asserts in its petition at 4 that Ritchie properly conducted his excursion, omitted from that discussion is any reference to the fact that the students on Ritchie's excursion were widely spread out, they were on the wrong side of the street with their backs to traffic, they had no adult chaperones, or that another student was killed and two others injured in the excursion. The District cites only its own expert's opinion. Pet. at 12. Accident reconstructionist Steven Harbison testified pointedly that Ritchie was blatantly negligent not only because his supervision of widely spread out students was lax, the students were on the wrong side of the road where

they could be struck by the Klein vehicle:

> 26. If Mr. Ritchie and Mr. Keigley had ensured the students crossed West Smith Road only at designated, marked crosswalks, they would have crossed the road at the designated, marked crosswalk adjacent to Windward High School and within the school zone, walked along the north side of West Smith Road, turned around, and returned to the school by crossing again at the designated, marked crosswalk at the intersection of West Smith Road and Northwest Drive.
>
> 27. Instead, Mr. Ritchie and Mr. Keigley had students cross the west end of West Smith Road outside of designated, marked crosswalks when there was no reason to do so and they could have returned to Windward High School along the sidewalk on the north side of West Smith Road.
>
> 28. If Mr. Ritchie and Mr. Keigley had selected a route that complied with pedestrian rules and the expectations from FSD's superintendent by only crossing at designated, marked cross walks, Gabriel Anderson's fifth period class would have been walking on the north side of West Smith Road on June 10, 2015 and would not have been struck by Defendant William Klein.
>
> 29. As a result, Gabriel Anderson would have not been hit by the vehicle and died at the scene.

CP 395.

C. ARGUMENT WHY REVIEW SHOULD BE DENIED

(1) The District Concedes that the Trial Court Erred in Basing Its Decision on a Lack of Duty on the Alleged Unforeseeability of Gabriel's Death

Buried in its petition at 9, District now *concedes* that it owed a broad protective duty to students under its care and custody, standing *in*

loco parentis to them. As the Estate argued below, appellants' br. at 12-18, such a duty is limited only by principles of foreseeability, a question of fact. *Id*. at 18-27. The trial court decided the case by ruling that the specific accident here was unforeseeable as a matter of law. That was error. Division I correctly discerned the District's duty and that foreseeability is assessed on the basis of whether the risk to the student was within a zone of danger, a fact question. A risk is not foreseeable unless it is "so highly extraordinary or improbable as to be wholly beyond the range of expectability." *McLeod v. Grant Cty. Sch. Dist. No. 128*, 42 Wn.2d 316, 323, 255 P.2d 360 (1953). Op. at 5-9.[2]

Notwithstanding its duty concession, the District nevertheless stubbornly insists in its petition at 17-18 that *Hendrickson v. Moses Lake Sch. Dist.*, 192 Wn.2d 269, 428 P.3d 1197 (2018) and *Anderson v. Soap Lake Sch. Dist.*, 191 Wn.2d 343, 423 P.3d 197 (2018) somehow diluted that broad protective duty. It asserts that no school liability decision of this Court has "gone so far as to hold that a school should be subject to liability, simply for taking students out in public, or off campus to a location where otherwise ordinary risks could, but rarely do, happen." Pet. at 17-18. Yet again, the District attempts to rehash duty and

[2] Indeed, Ritchie himself *admitted* that the collision that killed Gabriel was foreseeable, CP 488-89, as did the District's expert. CP 515.

foreseeability that it has now conceded and to cast the facts in a light favorable to it. And it is wrong on the law. A district *is* liable when, due to its negligence, a student under its care is harmed. *N.L. v. Bethel Sch. Dist.*, 186 Wn.2d 422, 378 P.3d 162 (2016). There, this Court rejected a school district's legal causation argument where an 18-year-old student who was a registered sex offender persuaded a 14-year-old he met at joint middle school-high school track practice to leave campus with him and took her to his house where he raped her.

As noted in the Estate's opening brief at 17-18, *Hendrickson* and *Anderson* merely clarified the scope of a school district's duty to its students. The *Hendrickson* court made clear that a "heightened" duty is not owed, but the duty is, nevertheless, broader than the usual limited pool of risk, requiring districts to take affirmative precautions to protect students from "all reasonably foreseeable harm even when that harm is caused by third parties." Districts must actually *anticipate* harm to students. 192 Wn.2d at 277.[3] And under that broad protective duty, a

[3] Lacking the courage of its convictions in failing to raise the point as an actual issue for review, pet. at 2, the District implies that it is essentially immune from suit because its duty is *in loco parentis* and parental liability in Washington is "limited." Pet. at 18. The District *nowhere* advanced this argument in its trial court motion pleadings, CP 26-47, 528-36, and it should be foreclosed from doing so on appeal. RAP 2.5(a). Its argument is oblique at best and wrong in any event. In *Zellmer v. Zellmer*, 164 Wn.2d 147, 188 P.3d 497 (2008), for example, this Court made clear that parental immunity was confined to situations involving negligent parental upbringing of a child, but not to intentional harms, wanton or willful misconduct, or situations where the parent stands outside the parental role such as in the operation of an automobile. *Accord*, *Smelser v.*

district has "the responsibility of reasonable supervision." *Kok v. Tacoma Sch. Dist. No. 10*, 179 Wn. App. 10, 18, 317 P.3d 481 (2013), *review denied*, 180 Wn.2d 1016 (2014); *J.N. By and Through Hager v. Bellingham Sch. Dist. No. 501*, 74 Wn. App. 49, 57, 871 P.2d 1106 (1994).

In sum, the District owed Gabriel a broad protective duty of care while he was under its care and custody. That duty, conceded by the District, is constrained by only foreseeability, a *question of fact*. *Anderson*, 191 Wn.2d at 369 n.19. Of course, the foreseeability analysis requires that the risk fall within the "general field of danger," and need not involve a specific harm. *McLeod*, *supra*; *N.L.*, 186 Wn.2d at 430-31. *See also*, *Berglund v. City of Spokane Cty.*, 4 Wn.2d 309, 103 P.2d 355 (1940); *Rikstag v. Holmberg*, 76 Wn.2d 265, 456 P.2d 355 (1969); *Hopkins v. Seattle Pub. Sch. Dist. No. 1*, 195 Wn. App. 96, 380 P.3d 584, *review denied*, 186 Wn.2d 1029 (2016); *Quynn v. Bellevue Sch. Dist.*, 195 Wn. App. 627, 383 P.3d 1053 (2016).

Thus, Division I's discussion of foreseeability, op. at 7-9, was entirely correct, and that decision has significant implications for cause-in-

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Paul, 188 Wn.2d 648, 398 P.3d 1086 (2017); *Woods v. H.O. Sports Co. Inc.*, 183 Wn. App. 145, 333 P.3d 455 (2014) (negligent parental conduct, as in the operation of a boat or car is different than negligence associated with parental control, discipline, or discretion). The parental immunity doctrine, designed to protect parental upbringing of a child, has no application to a school district.

fact where both are questions of fact.

(2) Division I Correctly Addressed Proximate Cause as a Question of Fact Here

The District's discussion of cause-in-fact is narrow, pet. at 9-10, 14-16 and fails to address that proximate cause in Washington is a question of fact.[4] Its argument that cause-in-fact merits review is disingenuous where it effectively conceded that Gabriel's death was foreseeable, within the zone of danger for such an improper excursion. Moreover, *ample* evidence below supported the proposition that the District's negligence proximately resulted in Gabriel's death, as Division I noted in detail. Op. at 9-12. Importantly, *the trial court never ruled on proximate cause*. CP 569-70.

The District nowhere addresses in its petition the *extensive* evidence the Estate offered below on proximate cause, including the

[4] Cause-in-fact in Washington is ordinarily a jury question. *E.g., Michaels v. CH2M Hill, Inc.*, 171 Wn.2d 587, 611, 257 P.3d 532 (2011) (where the evidence is conflicting, cause in fact is to be resolved by the trier of fact); *Martini v. Post,* 178 Wn. App. 153, 164, 313 P.3d 473 (2013) ("Cause in fact is usually a jury question and is generally not susceptible to summary judgment"); *Mehlert v. Baseball of Seattle Inc*., 1 Wn. App. 2d 115, 404 P.3d 97 (2017) (genuine issue of material fact was present as to whether absence of handrails on ramp leading to Mariners team store caused plaintiff's fall); *Tessema v. Mac-Millan Piper, Inc*., 5 Wn. App. 2d 1047, 2018 WL 5251954 (2018) (question of fact present as to whether staircase was unsafe due to icy conditions of which defendant had notice causing plaintiff's slip and fall, particularly in light of expert testimony); *Behla v. R.J. Jung, LLC*, 11 Wn. App. 2d 329, 453 P.3d 729 (2019) (reaffirms that proximate cause is fact question for jury and rejects reliance on contention that facts are "speculative," stating "speculation is a specious word. One person's proof may be another person's speculation." Court states that "the trial court should give the benefit of the doubt as to causation to the plaintiff and only dismiss a claim to the extent the court can decide that all reasonable people would conclude causation to be speculative.").

crucial expert testimony of former Superintendent of Public Instruction Judith Billings, Dr. Dennis Smith, and accident reconstructionist Steven Harbinson. Appellants' Br. at 30-38. As this Court is well aware, on summary judgment, it is not the District's rendition of the facts that controls, but whether the Estate's factual assertions, reviewed in a light most favorable to the Estate, including reasonable inferences from those facts, creates a genuine issue of material fact for the jury.

Given the extensive testimony from the Estate's experts and its own staff on cause-in-fact, the District is forced to resort in its petition to a contention that, in effect, its negligence could never be the proximate cause of the students' deaths and injuries, citing a traffic case. It seems to want to argue that "but for" causation is not really "but for" causation, after all, citing *Channel v. Mills*, 77 Wn. App. 268, 890 P.2d 535 (1995), a case the District cited in a footnote in its Division I brief. Resp't Br. at 20 n.2. But that case is ultimately unavailing to the District's position on proximate cause. There, Division II held that speed was not the proximate cause of an automobile accident if it did no more than bring the favored and disfavored drivers to the same location at the same time. The *Channel* court hastened to note that nothing in its opinion foreclosed proof that but for excessive speed, "the favored driver, between the point of notice and the point of impact, would have been able to brake, swerve or otherwise

avoid the point of impact." *Id*. at 278-79. Indeed, Division II itself said that if a plaintiff can document that but for the defendant's negligence, the plaintiff would not have been harmed, proximate cause is met. ("A cause in fact is a cause but for which the accident would not have happened."). *Id*. at 272-73. That is precisely what the Estate documented here on *multiple* levels, as Division I observed. Op. at 11-12.

For example, on causation:

- Dr. Smith testified that Ritchie's spur-of-the-moment excursion without parental permission should not have occurred at all as there was no educational benefit in it. CP 348;

- Ritchie's ill-fated excursion with the students required parental permission in accordance with Policy 2320, and the District's own personnel were themselves confused about the nature of Ritchie's action. Appellants' Br. at 31 n.22. Both SPI Judith Billings and Dr. Dennis Smith testified that the excursion was unsafe and violated District policy. CP 346-90;

- Rick Brudwick and Jill Iwasaki testified that District staff believed Policy 2320 applied to classes leaving the WHS campus, requiring parental permission. They required parental permission before PE class students could go on an excursion. CP 364-66; 378-79. Gabriel's grandmother, his guardian, never gave permission for the excursion. CP 433-24;

- As Steven Harbinson testified that Ritchie's conduct of his excursion was not only unsafe because it violated the District's policy, it was unsafe because the students were spread out, allowed to cross W. Smith Road wherever they chose, at other than designated crosswalks within the lower speed school zone and were unchaperoned. CP 395. His

> cavalier operation of the excursion caused the students to be struck by an inattentive driver like Klein.

But for *any* of these actions, Gabriel would not have been killed. As Division I discerned, op. at 9-12, fact questions abounded on cause-in-fact. Ritchie's impromptu excursion to discuss summer plans was unnecessary and not agreed to by parents, as the District's Policy 2320 commanded. That it occurred along a roadway where cars could travel up to 40 miles per hour without regard to traffic-related dangers was also a matter for the jury. Review is not merited because Division I correctly applied a cause-in-fact analysis. RAP 13.4(b).

(3) Division I Correctly Addressed Legal Causation in Light of This Court's Controlling Precedent

The central focus of the District's petition is legal causation, pet. at 5-9, an issue it raised only in passing in the trial court. CP 41-43, 333-35, and that the trial court *never reached*. CP 569 ("The defendant school district here argues that the accident was not foreseeable, and further argues that the Plaintiffs cannot establish legal cause or proximate cause."). Review is not merited on that issue in any event because Division I faithfully applied this Court's treatment of legal causation. Op. at 12-15.

This Court has determined that legal causation is closely associated with duty – whether, as a matter of policy, the connection between the

defendant's misconduct and the plaintiff's ultimate harm is too remote or insubstantial to permit liability to attach. *Schooley v. Pinch's Deli Market, Inc.*, 134 Wn.2d 468, 951 P.2d 749 (1998). The *Schooley* court held that legal causation principles did not bar a claim by a minor injured when a grocery store illegally sold liquor to another minor and that minor injured the plaintiff.

This Court rejected the District's legal causation argument in *Lowman v. Wilbur*, 178 Wn.2d 165, 309 P.3d 387 (2013), a case largely ignored by the District. Noting the connection between duty and legal causation, *id*. at 171, the Court held that where the jury found that the plaintiff passenger's injuries sustained when the driver lost control of her vehicle, left the road, and struck a utility pole placed too close to the roadway were within the scope of a municipality's duty to roadway users, the plaintiff's injuries were not too remote and legal causation did not foreclose liability.[5]

[5] *See also*, *Wuthrich v. King County*, 185 Wn.2d 19, 366 P.3d 926 (2016) (in roadway design case involving overgrown blackberry bushes obstructing motorist views at intersection, Court found proximate cause was a fact question for jury and rejected county's legal causation argument that it lacked notice of hazard of overgrown bushes; county had notice of the overgrown bushes and fact that no prior accidents occurred at intersection related to breach of duty and not causation); *State v. Frahm*, 193 Wn.2d 590, 444 P.3d 595 (2019) (Court holds that even under the narrower rule of legal causation applicable in criminal cases than in civil cases, legal causation was satisfied in a case where a drunk driver caused an accident on I-5 in Vancouver, a Good Samaritan stopped to assist the accident victim, and was himself then killed in a subsequent collision at the site; the drunk driver was legally the cause of the Good Samaritan's death for purposes of a vehicular homicide prosecution).

This Court has *routinely* rejected legal causation arguments in the school district setting. *E.g.*, *McLeod*, 42 Wn.2d at 365;[6] *N.L.*, 186 Wn.2d at 437-38. Indeed, as Division I noted at 14, the District fails to cite *a single case* in the school district liability setting that applies legal causation to deny liability, given the school districts' broad protective duty owed to students under their care and custody.

Because it cannot prevail on the basis of this Court's recent legal causation jurisprudence, the District invents an arcane three-step analysis it alleges *Schooley* requires and relies on *King v. City of Seattle*, 84 Wn.2d 239, 525 P.2d 228 (1974), an overruled case,[7] for its position on legal causation. Pet. at 5-9.

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[6] The *McLeod* court indicated that issues of foreseeability and legal causation revolve around the same principle of whether the harm is within the general field of danger:

> Having given full consideration to the factor of foreseeability in discussing the allegations as to negligence, it is not necessary to cover the same ground in dealing with proximate cause. We have held that it is for the jury to decide whether the general filed [sic] of danger should have been anticipated by the school district. If the jury finds respondent negligent in not having anticipated and guarded against this danger, then it is not for the court to say that such negligence could not be a proximate cause of a harm falling within that very field of danger.

Id. at 365.

[7] The central issue of *King* was whether a municipality could tortiously interfere with a business expectancy of a developer by denying a building permit. This Court held that it could not, only to reverse course in *Pleas v. City of Seattle*, 112 Wn.2d 794, 774 P.2d 1158 (1989) and *City of Seattle v. Blume*, 134 Wn.2d 243, 947 P.2d 223 (1997) to conclude that such a claim was possible. This Court's more recent discussions of legal causation in *Schooley* and *Lowman* are more cogent than the *King* court's treatment of legal causation.

As noted *supra*, there is no three-step analysis in *Schooley*. Applying principles of logic, common sense, justice, policy, and precedent, as dictated by the *Schooley* court, 134 Wn.2d at 479, the connection between the harm to Gabriel and the District's negligence was not too tenuous or remote, particularly given the District's apparent concession that foreseeability is a fact question here, as Division I opined. Op. at 14. This is particularly true in the setting of the District's protective duty owed to Gabriel, a duty that even extends to *anticipating* foreseeable harms to students in its care and custody. Moreover, as this Court directed in *Lowman*, duty and legal causation are analogous concepts as noted *supra*. The District refuses to acknowledge the majority holding in *Lowman* and disclaims any relationship between the duty it acknowledged it owed to Gabriel and the other students, and legal causation. Division I was correct to reject its analysis. Op. at 15 ("Ferndale's urging that we uncouple legal causation analysis from duty analysis runs counter to the Supreme Court's teachings in *Lowman*.").

Division I honored this Court's legal causation case law. By contrast, the District's legal causation argument is contrary to *Schooley* and *Lowman*. Review is not merited. RAP 13.4(b).

D. CONCLUSION

Ultimately, Division I applied this Court's well-established

precedents in reversing the trial court's decision. Under Washington's broad protective duty (*in loco parentis*) for school districts with respect to students under their charge extending to off-campus activities, Gabriel was owed a duty of care. And, the trial court here erred in ruling as a matter of law on foreseeability; it applied an incorrect standard for foreseeability. Gabriel Anderson died tragically, and unnecessarily, as a result of the District's negligence.

This Court should deny review. The District has failed to establish that review would be appropriate where Division I's opinion was a straightforward application of well-established principles of causation. RAP 13.4(b)(1)-(2). The District disregarded his protection by violating its own policy on off-campus excursions, failing to secure Gabriel's grandmother's permission for the unnecessary excursion, and disregarding traffic safety standards so that the Klein vehicle could strike him and other students. Legal causation principles do not bar the Estate's action. And, notwithstanding its "parade of horribles" argument, pet. at 17-19, this is not a case of substantial public importance this Court should address. RAP 13.4(b)(4). This Court should allow Division I's well-reasoned opinion reversing the trial court's order on summary judgment to stand. Costs on appeal should be awarded to the Estate.

DATED this ___ day of April, 2020.

Respectfully submitted,

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DECLARATION OF SERVICE

On said day below, I electronically served a true and accurate copy of the ***Answer to Petition for Review*** in Supreme Court Cause No. 98280-5 to the following parties:

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Original E-Filed with:
Supreme Court
Clerk's Office

I declare under penalty of perjury under the laws of the State of Washington and the United States that the foregoing is true and correct.

DATED: March 24, 2020, at Seattle, Washington.

Sarah Yelle, Legal Assistant
Talmadge/Fitzpatrick

TALMADGE/FITZPATRICK

March 24, 2020 - 11:37 AM

Transmittal Information

Filed with Court:	Supreme Court
Appellate Court Case Number:	98280-5
Appellate Court Case Title:	Bonnie I. Meyers, et al. v. Ferndale School District
Superior Court Case Number:	15-2-02248-9

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