NO. 98596-1

SUPREME COURT OF THE STATE OF WASHINGTON

In Re the Dependency of E.M., minor child,

STATE OF WASHINGTON,
Department of Children, Youth, and Families,

Respondent,

v.

J.M.,

Petitioner.

DCYF ANSWER IN OPPOSITION TO PETITION FOR REVIEW

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I. INTRODUCTION

This Court should deny review because the case is now moot. Aimée Sutton, the attorney retained by the child's former caregiver to represent then three-year-old E.M., has become a King County Superior Court judge. As such, she is no longer available to represent E.M. in the dependency proceeding, and this Court cannot provide effective relief.

In the alternative, if the merits of the issues are considered for review, review should be denied because the Court of Appeals correctly applied the *de novo* review standard while interpreting RCW 13.34.100. Then, the Court of Appeals properly applied the abuse of discretion standard to affirm the trial court's decision not to permit the representation. To correctly interpret RCW 13.34.100(7), the Court of Appeals examined the remainder of RCW 13.34.100 in addition to considering the statute's legislative history and the associated legislative findings. The Court of Appeals then properly concluded that the legislature envisioned that dependency courts would perform a gatekeeping role to ensure attorneys representing children are trained in dependency issues and are representing children without a conflict of interest. This correct interpretation of the statute does not require further review.

Lastly, this case fails to present an issue of substantial public interest under RAP 13.4(b)(3) because it affects only the parties to the case, and the

issue rarely arises in dependency proceedings. Ms. M. fails to show that the criteria for review have been satisfied, and the petition for review should be denied.

II. ISSUE PRESENTED FOR REVIEW

When a dependent child has not made a choice to be represented by retained counsel, must counsel retained by an interested third party seek appointment by the dependency court under RCW 13.34.100(7) before the attorney commences representing the child?

III. STATEMENT OF THE CASE

The Petitioner, J.M., is the mother of three children. CP 81. In addition to her youngest child, E.M., her two other children are M.M. and S.M. CP 3. In January 2010, the Department determined that Ms. M. neglected infant S.M. when she left him alone in a parked car for 55 minutes at night when it was 27 degrees outside. CP 390-91. Ms. M. has a history of mental health issues. CP 3-4. She has been diagnosed (in separate evaluations) with obsessive-compulsive disorder and delusional disorder, persecutory type. CP 3, 1565.

In November 2011, Ms. M.'s second-eldest child, S.M., disappeared while he was in her care and custody. CP 81. Ms. M. claims she left then two-year-old S.M. alone in her car after the car ran out of gas, and that he was gone from the car when she returned. CP 391. Law enforcement,

however, determined that the car had not run out of gas. CP 391. Law enforcement was unable to locate S.M. despite an extensive search. CP 4. Ms. M. has provided false information in the past regarding her identity and her living situation. CP 402. S.M. remains missing, his disappearance remains unsolved, and Ms. M. is the subject of an open and ongoing law enforcement investigation. CP 86. Ms. M. has not cooperated with the police in regards to their search for S.M. CP 391. S.M.'s father is not a suspect in S.M.'s disappearance. CP 391.

E.M. was born on July 10, 2015. CP 1. At the time of his birth, the hospital contacted Child Protective Services, expressing concern about Ms. M.'s mental health. CP 406. E.M.'s father has criminal history for domestic violence, and he was incarcerated at that time. CP 291. The Department filed a dependency petition as to E.M. a few days after he was born. CP 1. Ms. M. agreed to dependency, and the dependency court placed E.M. in the care of his maternal grandmother. CP 290, 296.

Initially, Ms. M. was allowed to live in the home with the grandmother and E.M. under conditions imposed by the Court. CP 63. Then, in April 2017, the grandmother made a series of phone calls to the Department, expressing her concerns about Ms. M.'s behaviors, and stating that she feared she would "lose another grandchild." CP 391, 97. According to the grandmother's initial report, Ms. M. told her she would never see

E.M. again if she cooperated with the Department. CP 391.

The Department filed a motion to place E.M. in foster care. CP 301. In response, in May 2017, King County Superior Court Judge Patrick Oishi ordered Ms. M. to move out of the grandmother's home. CP 301-02. Ms. M. sought discretionary review of this order, and review was denied. *In re Dependency of E.M.,* No. 76959-6-I (Nov. 2, 2017) at 4.

In April 2018, the dependency court heard a motion filed by Ms. M. to have the grandmother approved as a monitor for Ms. M.'s visits with E.M. CP 304. The court denied this motion, based upon a "history of conflict between the mother and grandmother." CP 304.

In May 2018, Ms. M. filed a motion asking to remove E.M. from the grandmother's home and seeking placement in the home of James Kelly (where Ms. M. also resided). CP 7-32. Ms. M. did not seek appointment of counsel for E.M. prior to filing a motion to change E.M.'s placement. CP 1900. E.M.'s father filed a competing motion asking to place E.M. in foster care. CP 305-384. The Department's response to the two competing motions opposed Ms. M.'s motion and deferred to the court on the placement change suggested by E.M.'s father. CP 385-412. Ms. M.'s pleadings stated she was "in agreement that her mother Nadia Biryukova should be allowed to act simply as a grandmother and return to work, thus necessitating a change of placement from maternal grandmother Nadia

Biryukova to James Kelly." CP 414.

E.M.'s father argued that Ms. M.'s motion was "nothing more than an attempt to have [E.M.] placed with her." CP 425. His declaration stated that Ms. M. had warned him repeatedly that if he interfered with her reunification efforts with E.M., "NOBODY would see [E.M.] again." CP 425-26 (Emphasis in original). E.M.'s father's reply notes, "[u]nfortunately, there is no longer a CASA on this case, due largely in part to the barrage of constant emails and personal attacks on the parties from Ms. Biryukova and Ms. [M], which is a detriment to the child." CP 430. The extensive motion process eventually resulted in a July 11, 2018 order placing E.M. in foster care. CP 1896.

Ms. M. filed a separate motion for discretionary review under Court of Appeals number 78824-8-1 seeking review of the superior court's placement decision. After review was denied in the Court of Appeals, a motion for discretionary review was denied by this Court under No. 97336-9. Later, a certificate of finality was entered, ending the appellate litigation regarding E.M.'s placement in foster care.

Meanwhile, at the superior court level, on July 18, 2018, a lawyer named Aimée Sutton filed a notice of appearance to represent E.M. CP 1914. Ms. Sutton's notice of appearance was not filed in conjunction with any discovery request. CP 1930. The Department, E.M.'s father, and

E.M.'s GAL initially did not know who had hired Ms. Sutton. CP 86, 1930, 1949. When asked, Ms. Sutton refused to explain who had hired her. CP 86.

On July 19, 2018, an attorney from the CASA program filed a notice of appearance for a trained dependency GAL named Emma Bergin. CP 1915-17.

Ms. Sutton attempted to contact E.M., but the Department refused to provide his location in foster care, as this information is confidential. RP 7, 13. Five days after filing her notice of appearance, Ms. Sutton filed a motion to reconsider E.M.'s placement into foster care, seeking to return the child to the grandmother's home. CP 1918-1925. Ms. Sutton requested a "full evidentiary hearing" on the proposed change of placement, arguing the court violated state law by not deferring to the wishes of Ms. M. in regards to E.M.'s placement. CP 1918, 1921. Judge Oishi issued a preliminary order denying Ms. Sutton's request for a full evidentiary hearing on the motion for reconsideration. CP 1926. Judge Oishi required all parties to file a written response to "address the child's request for alternate placement with the maternal grandmother." CP 1926. Judge Oishi scheduled oral argument to address Ms. Sutton's motion. CP 1927.

On July 30, 2018, along with its response to the motion for reconsideration, the Department filed an objection to the notice of appearance filed by Ms. Sutton. CP 85. In addition, the Department social

worker provided a declaration explaining her "serious concerns" about the proposal to place E.M. back in the care of his maternal grandmother. CP 97.

E.M.'s father also filed a response to the motion for reconsideration, seeking to strike Ms. Sutton's notice of appearance. CP 1928. E.M.'s father noted that it appeared as though Ms. Sutton had not spoken to any of the parties except Ms. M. prior to filing her motion for reconsideration. CP 1930. He argued that Ms. Sutton's lack of "any collateral information" was "extremely concerning." CP 1930. He expressed his belief that Ms. Sutton had not acted in accordance with the RPCs and "instead appears to be relying solely on information from the mother and acting based on the mother's directives…" CP 1935. The father also noted the confidential nature of information in dependency cases. CP 1930. He argued in favor of a requirement for child's counsel to be "court-appointed." CP 1929. Instead of retained counsel for E.M., the father supported the current GAL appointment, noting that due to the age of the child, the GAL appointment was "sufficient to protect and advocate for his best interests in this case." CP 1931.

Ms. M. filed a response to the motion for reconsideration, supporting the motion for reconsideration filed by Ms. Sutton, and (contrary to her own earlier motion) seeking E.M.'s placement in the care of the maternal grandmother. CP 1953.

E.M.'s GAL filed a response to Ms. Sutton's motion, and she took "no position on the placement motion due to her recent appointment." CP 1947. The attorney for the CASA program argued that the notice of appearance filed by Ms. Sutton was "contrary to the procedure required by RCW 13.34.100," as Ms. Sutton was attempting to appear "without an order for appointment of counsel for the child." CP 1947. The CASA program attorney argued that from reviewing the pleadings filed by Ms. Sutton, "it appears that the attorney has only reviewed the most recent legal documents, has not reviewed discovery and may not have met the child at the time of the filing of the Motion." CP 1947. The CASA attorney additionally noted there was "no motion before the court asking for appointment of an attorney for this toddler." CP 1949.

On August 1, 2018, Ms. Sutton filed a declaration revealing that E.M.'s former relative caregiver had retained her to represent E.M. CP 265. The following day, during a contested hearing, Judge Oishi heard from all the parties, considered the Rules of Professional Conduct, the Admission to Practice Rule 5(g), RCW 13.34.100, and *In re Dependency of M.S.R.*, 174 Wn.2d 1, 271 P.3d 234 (2012), before deciding to strike Ms. Sutton's notice of appearance and the motion for reconsideration. CP 263-64. Ms. M. sought review of this decision, and the Court granted discretionary review. On February 24, 2020, the Court of Appeals issued an opinion affirming the

dependency court's order. *Matter of the Dependency of E.M.*, 12 Wn.App.2d 510, 458 P.3d 810 (2020). After her motion for reconsideration was denied, Ms. M. petitioned for review in this Court.

IV. REASONS WHY REVIEW SHOULD BE DENIED

A. The Issues Presented Are Moot

Instead of presenting a claim of substantial public interest, Ms. M. presents moot issues. Aimée Sutton is now a King County Superior Court judge,[1] and, as such, she is no longer available to represent E.M. The inability of the appellate court to provide effective relief is an indicator of mootness. *In Re LaBelle*, 107 Wn.2d 196, 200, 728 P.2d 138 (1986). In addition, neither the grandmother nor any party to the dependency proceeding filed a motion in superior court seeking independent counsel for E.M. at public expense, and E.M. has a current guardian ad litem adequately representing his best interests. CP 1949, 1915-17. Nor is there evidence in the record of any pending notice of appearance filed by a privately retained attorney. Consequently, there is no effective remedy to provide nor any remedy even being sought for E.M. As a general rule, the appellate court will not hear moot cases. *Hart v. Social and Health Services*, 111 Wn.2d 445, 447, 759 P.2d 1206 (1988). This case presents moot issues, and review

[1] *See* King County Superior Court, Judge Directory, Judge Aimée Sutton, https://kingcounty.gov/courts/superior-court/directory/judges/sutton.aspx (last accessed on June 18, 2020).

is not warranted.

In addition, while in the past there were periods of time when E.M. did not have a GAL assigned to his case, on August 2, 2018, when the trial court struck the notice of appearance, E.M. had a trained dependency GAL (Emma Bergin). CP 264, 1915-17. There is no indication in the record that for any period of time during the nearly two years that have elapsed while this appellate litigation has been pending that E.M. has not had a trained GAL. Without such evidence, this Court should presume that the statute requiring a GAL is being followed.[2] Ms. M.'s argument that E.M. is without a guardian ad litem should not be considered to reflect the current situation. Petition at 16. Instead, during the past two years, this Court should presume that E.M. consistently had a trained GAL protecting his best interests in the underlying highly contentious dependency proceeding.

B. Review Should be Denied Because the Court of Appeals Applied the Correct Standards of Review and Correctly Interpreted RCW 13.34.100(7)

1. The Court of Appeals correctly applied the *de novo* standard and then the abuse of discretion standard

Ms. M. incorrectly claims that this Court applied an abuse of discretion standard while interpreting the statutory language found at RCW 13.34.100(7). Petition at 8. Instead, the Court of Appeals applied the

[2] RCW 13.34.100(1) contains a general requirement for the appointment of a guardian ad litem for a child who is the subject of a dependency action.

two correct standards of review to the two aspects of its decision. First, the Court of Appeals addressed the statutory interpretation of RCW 13.34.100(7) under the *de novo* standard. Op. at 9-10. Then, after determining the statute authorized an oversight role for the dependency court in regards to the appointment of private counsel for dependent children, the Court of Appeals applied the abuse of discretion standard to the trial court's decision in this particular case to exercise that oversight authority and to reject the notice of appearance. Op. at 10-11.

Ms. M. further confuses the issue by claiming that the Court's use of RPCs in making its decision is a question of law reviewed *de novo*. Petition at 8. That aspect of the Court's decision was examining whether the court abused its discretion when engaging in its oversight role—an analysis that can include whether the court erroneously applied the law. Ms. M. had claimed that the trial court held an erroneous view of the law. Specifically, she argued that "the court's invocation of the RPCs and APR 5(g) was erroneous…" Brf of Appellant at 19. A dependency court abuses its discretion if its ruling is manifestly unreasonable, or is exercised on untenable grounds or for untenable reasons. *In re Dependency of T.L.G.*, 139 Wn. App. 1, 15, 156 P.3d 222 (2007); *State v. Rohrich*, 149 Wn.2d 647, 654, 71 P.3d 638 (2003). "A trial court would necessarily abuse its discretion if it based its ruling on an erroneous view of the law."

Washington State Physicians Ins. Exch. & Ass'n v. Fisons Corp, 122 Wn.2d 299, 339, 858 P.2d 1054 (1993). While applying the abuse of discretion standard, the Court of Appeals appropriately considered Ms. M.'s claim that the trial court erroneously considered the Rules of Professional Conduct. Op. at 10-11. The Court of Appeals correctly rejected Ms. M.'s claim that individual judges are prohibited from considering the RPCs when making a discretionary decision on whether to permit privately retained counsel to represent a dependent child. Op. at 10-12.

Ms. M.'s issue with the lower Court's reliance upon *Pub. Util. Dist. No. 1 of Klickitat County v. Int'l Ins. Co.*, 124 Wn.2d 789, 881 P.2d 1020 (1994) ("*Klickitat PUD*") also lacks merit and does not require review. Petition at 9. The Court of Appeals appropriately relied upon *Klickitat PUD* when determining the abuse of discretion standard applied to the dependency court's decision not to permit Ms. Sutton to serve as E.M.'s attorney. One of the issues raised in *Klickitat PUD* involved appellate review of the trial court's ruling on a motion to disqualify an attorney because the plaintiff's attorney was being called as a witness by the defendants. *Klickitat PUD.*, 124 Wn.2d at 811. The trial court, after reviewing RPC 3.7 and considering the competing concerns expressed by the parties, decided not to require disqualification of the attorney. *Klickitat PUD*, 124 Wn.2d at 812-13. This Court then evaluated the trial court's

decision, applied the abuse of discretion standard, and found no abuse of discretion in the trial court's decision not to disqualify the attorney. *Id.* at 812.

> Under the circumstances, we find the trial court's ruling under RPC 3.7 to be an appropriate compromise, balancing the interests of both the plaintiffs and the defendants. We find no abuse of discretion.

Id. The *Klickitat PUD* decision supports the proposition that the abuse of discretion standard applies to appellate review of a trial court's decision on whether to disqualify an attorney in the context of RPC requirements. The Court of Appeals appropriately relied on case law from this Court to render an opinion that was correctly decided, and no further review is warranted.

2. The Court of Appeals correctly interpreted RCW 13.34.100 to conclude the legislature envisioned the oversight role of the court

The Court of Appeals properly concluded that the legislature envisioned that dependency courts would perform a gatekeeping role to ensure attorneys representing children are trained in dependency issues and are representing children without a conflict of interest. Op. at 9. In reaching this conclusion, the Court of Appeals correctly examined not only RCW 13.34.100(7) but also legislative history, related legislative findings, and the remainder of the statute. Op. at 8-11. The Court of Appeals considered the legislature's amendment to the statute in 2010, which added a finding stating, "when children are provided attorneys in their dependency

and termination proceedings, it is imperative to provide them with well-trained advocates so that their legal rights around health, safety, and well-being are protected." Laws of 2010, ch. 180, § 1. Op. at 10. Judicial oversight is required to ensure that only well-trained advocates serve the role of representation of dependent children.

Instead of reading RCW 13.34.100(7) in isolation, as Ms. M. proposes, the Court of Appeals considered the related statutory provisions contained within RCW 13.34.100. For example, The Court of Appeals considered RCW 13.34.100(6)(a) which addresses potential conflicts of interest. Op. at 10-11. This portion of the statute provides that "[t]he court may appoint one attorney to a group of siblings, unless there is a conflict of interest or such representation is otherwise inconsistent with the rules of professional conduct." RCW 13.34.100(6)(a). The Court of Appeals correctly viewed this language as a demonstration of "the legislature's concern that courts have oversight of the appointment process to all dependent children." Op. at 11. The correct interpretation of the RCW 13.34.100(7) contained in the Court of Appeals' opinion does not require further review.

3. Review should be denied because the Court of Appeals Correctly determined the trial court did not abuse its discretion

King County Superior Court Judge Patrick Oishi's decision not to

allow Aimee Sutton to represent E.M. was an acceptable exercise of the court's discretion. The dependency court considered the Rules of Professional Conduct, the Admission to Practice Rule 5(g), RCW 13.34.100, and *In re Dependency of M.S.R.*, 174 Wn.2d 1, 271 P.3d 234 (2012), before deciding to strike Ms. Sutton's notice of appearance. CP 263. RPC 1.8(f) provides that a lawyer "shall not accept compensation for representing a client from one other than the client" unless the client gives "informed consent." Ms. Sutton admitted it "will likely not be possible to get informed consent directly." CP 256. E.M. had never met or spoken to the attorney retained to represent him. RP 13. E.M. had not provided informed consent to the retained attorney, and he had not waived any potential conflict created by the fact that the attorney was retained by his former caregiver. RP 13; CP 91, 265. The dependency court correctly concluded that three-year-old E.M. did not provide informed consent for representation by Ms. Sutton. RP 16.

Although the dependency court did not find a specific violation of the RPCs had yet taken place, the court properly referred to the RPCs to evaluate whether to accept the attorney's notice of appearance. The dependency court also concluded there was at least a potential conflict. The dependency court determined the question "boiled down just into one nutshell" which was "the problem of potential conflict, and obviously that's

why I talked about the RPC." RP 20.

RCW 13.50.100 provides that records of dependency court hearings "shall be confidential" and proscribes limited instances in which they may be released. RCW 13.50.100(2). When Ms. Sutton asked the Department for release of the location of E.M. in foster care, which was a request for confidential information, the Department properly desired court approval prior to releasing this information. RP 7. When Ms. Sutton filed a motion to return E.M. to the care of the person paying her retainer without first meeting E.M. and, even more significantly, without obtaining access to and reviewing the confidential records explaining E.M.'s complex and vulnerable circumstances, Ms. Sutton provided the court with tenable grounds to support the decision not to permit her representation. The Court of Appeals correctly concluded the dependency court did not abuse its discretion in deciding to strike Ms. Sutton's notice of appearance after considering the RPCs. Op. at 12.

Nor were the procedures used by dependency court "fundamentally unfair" to E.M., as Ms. M. claims. Petition at 12. Before making a ruling, Judge Oishi appropriately heard from the parties regarding interpretation of RCW 13.34.100(7) in addition to hearing the parties' legitimately held concerns as to a conflict of interest. The procedure utilized is consistent with basic principles of due process. *See*, RCW 13.34.090(1) (providing "[a]ny

party" in all dependency proceedings the right to "be heard in his or her own behalf"). As noted by the Court of Appeals, RCW 13.34.100(6)(a) addresses the question of a potential conflict of interest. Op. at 10. If the dependency court had employed the procedure impliedly suggested here by Ms. M., involving an absolute refusal to hear the concerns from parties to the dependency proceeding regarding a potential conflict of interest, the resulting scenario truly could have been troubling. Fortunately, here the trial court appropriately heard and considered argument from the parties before making its ruling.

C. The Opinion Addresses the Rare Occurrence of Privately Retained Counsel for Dependent Children

The American Bar Association has established standards for lawyers representing children in dependency proceedings. *Standards of Practice for Lawyers Who Represent Children in Abuse and Neglect Cases*, Approved February 5, 1996.[3] The commentary accompanying the standards refer to the "rare" circumstance where someone seeks to have retained counsel recognized as sole legal representative of the child:

> *Although such representation is rare*, there are situations where a child, or someone acting on a child's behalf, seeks out legal representation and wishes that this lawyer, rather than one appointed by the court under the normal

[3] The ABA standards are available at https://www.americanbar.org/content/dam/aba/administrative/child_law/repstandwhole.pdf (last viewed June 17, 2020).

> appointment process, be recognized as the sole legal representative of the child. Sometimes, judges have refused to accept the formal appearances filed by such retained lawyers. These Standards propose to permit, under carefully scrutinized conditions, the substitution of a court-appointed lawyer with the retained counsel for a child.

Id. at 19.

Ms. M. seeks review under RAP 13.4(b)(3), so the consideration governing acceptance of review in this Court is whether "the petition involves an issue of substantial public interest that should be determined by the Supreme Court." Petition at 15. The ABA commentary appropriately characterizes retained counsel for a dependent child as rare, and the facts of this care are even more unique, in that the child at issue was not making an independent choice to be represented by the counsel retained for him. Such a situation is likely to recur only on a very infrequent basis in Washington, given the statutory provisions authorizing appointment of "well-trained" independent counsel for children "at public expense." RCW 13.34.100(7)(b)(i)(A) and (B); Findings- Laws of 2010, ch. 180. As this petition presents a circumstance that occurs rarely, there is not adequate public interest to support further review.

V. CONCLUSION

Ms. M. has failed to establish that the opinion from the Court of Appeals raises any issues requiring resolution by this Court. The Respondent therefore respectfully requests that this Court deny the Petition

for Review.

RESPECTFULLY SUBMITTED this 25th day of June, 2020

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s/ Kelly Taylor
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CERTIFICATE OF SERVICE

The undersigned certifies under the penalty of perjury under the laws of the State of Washington that on the below date, the original documents to which this Declaration is affixed/attached, was filed in the Supreme Court of the State of Washington, under Case No. 98596-1, and a true copy was e-mailed or otherwise caused to be delivered to the following attorneys or party/parties of record at the e-mail addresses as listed below:

1. Jan Trasen, Washington Appellate Project, wapofficemail@washapp.org; and jan@washapp.org; and

2. Kathleen Martin, Dependency CASA Program, casa.group@kingcounty.gov; and kathleen.martin@kingcounty.gov.

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

DATED this 25th day of June, 2020, at Seattle, WA.

s/ Patricia A. Prosser
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ATTORNEY GENERAL'S OFFICE, SHS, SEATTLE

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