FILED
SUPREME COURT
STATE OF WASHINGTON
12/31/2020 1:48 PM
BY SUSAN L. CARLSON
CLERK

No. 99271-1

**SUPREME COURT
OF THE STATE OF WASHINGTON**

SYMON B. MANDAWALA

Appellant,

v.

ERA LIVING, LLC

Respondent,

RESPONDENT'S ANSWER TO PETITION FOR REVIEW

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I. IDENTITY OF THE RESPONDENT

The Respondent to the Petition for Review is Era Living, LLC ("Era Living").[1] Era Living respectfully requests the Court deny Appellant Symon Mandawala's Petition for Review.

II. COURT OF APPEALS DECISION

The unpublished decision at issue is *Symon B. Mandawala v. Era Living at ATP and Dennis Newman Jr.*, No. 80543-6-1 (Div. I, Nov. 2, 2020).

III. INTRODUCTION

The Court should deny Mandawala's Petition for Review because Mandawala has not demonstrated that review is warranted under any of the factors set forth in RAP 13.4(b). The Court of Appeals' unpublished decision in this case is wholly consistent with the precedent of this Court and the Court of Appeals, presents no cognizable questions of constitutional law, and presents no issue of substantial public interest.

Both the trial court and the Court of Appeals properly applied the law to this case when they granted Era Living's motion to dismiss Mandawala's various claims against Era Living due to Mandawala's

[1] Mandawala's Complaint and the caption incorrectly identify Era Living, LLC as "Era Living at ATP."

failure to properly serve Era Living as required by Washington State Superior Court Civil Rule ("CR") 4 and RCW 4.28.080(9).

IV. COUNTERSTATEMENT OF THE ISSUES PRESENTED FOR REVIEW

1. Did the Court of Appeals properly affirm the trial court's dismissal of Mandawala's claims against Era Living where Mandawala failed to present a prima facie case that he had properly served Era Living with process?

2. Did the Court of Appeals properly affirm the trial court's dismissal of Mandawala's claims against Era Living where Era Living consistently and repeatedly raised the defense of insufficient service of process and promptly moved to dismiss?

3. Did the Court of Appeals properly affirm the trial court's dismissal of Mandawala's claims against Era Living where neither CR 15 nor CR 4(h) allow a party to amend insufficient service of process?

V. COUNTERSTATEMENT OF THE CASE

A. Statement of Facts

Mandawala filed a complaint ostensibly against Era Living in King County Superior Court on February 4, 2019. Clerks Papers ("CP") at 7. On February 21, 2019, Mandawala mailed a copy of the Complaint and the Order Setting Civil Case Schedule to "Era Living." CP at 213-39. He subsequently sent various other combinations of the Complaint, Order

Setting Civil Case Schedule, and a purported Certificate of Service to Era Living on February 26, 2019 and March 25, 2019. CP at 241-77. Both mailings were addressed generally to "Era Living." *Id.* Neither of Mandawala's mailings included a Summons. CP 134.

On April 22, 2019, counsel for Era Living, Skylar Sherwood, sent a letter to Mandawala, who is pro se, informing him that he had not properly served Era Living and that Era Living intended to move to dismiss the case for failure to do so. CP at 108. This letter included a link to the Washington State Superior Court Civil Rules, and explained that the requirements for proper service of process are outlined in the rules. *Id.* Mandawala emailed Ms. Sherwood the next day expressing his opinion that he had properly served Era Living on March 25, 2019. CP at 283-84. Ms. Sherwood responded to Mandawala, reiterating that the mailing Mandawala referenced did not constitute proper service and again referencing the link to the Civil Rules that she included in her April 22 letter. *Id.*

Following these communications, Mandawala never served Era Living as required by CR 4 and RCW 4.28.080(9).[2] At no time did he serve Era

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[2] The only subsequent communications between Mandawala and counsel for Era Living were in connection with scheduling a hearing for Era Living's Motion to Dismiss. CP at 30.

Living's registered agent or any other individual enumerated in RCW 4.28.080(9)—each of Mandawala's mailings was addressed to "Era Living." CP at 213, 241, 250.

B. <u>Procedural History</u>

As explained above, Mandawala filed his complaint on February 4, 2019. CP at 7. On July 26, 2019, Era Living filed a Motion to Dismiss, which was granted after oral argument on August 30, 2019. CP at 133. On September 5, 2019, Mandawala filed a Motion for Reconsideration, CP at 136, which was denied on September 30, 2019. CP at 174. Mandawala filed his Notice of Appeal to Division I of the Court of Appeals on September 23, 2019. The Court of Appeals issued an unpublished opinion affirming the trial court's dismissal of Mandawala's claims against Era Living on November 2, 2020.

VI. ARGUMENT FOR DENIAL OF PETITION FOR REVIEW

The Court should deny Mandawala's Petition for Review because he has not demonstrated that review should be granted under any of the provisions of RAP 13.4(b). Under RAP 13.4(b), a petition for review will be granted by this Court only if the Court of Appeals' decision (1) conflicts with a decision of the Supreme Court; (2) conflicts with a published decision of the Court of Appeals; (3) involves a "significant question" of constitutional law; or (4) involves "an issue of substantial

public interest that should be determined by the Supreme Court." Mandawala fails to address these factors in his petition, and instead focuses exclusively on rehashing various meritless arguments that have already been considered and rejected by the Court of Appeals or makes new arguments raised for the first time in his Petition that should be disregarded.

A. The Court of Appeals' Decision Is Consistent with Washington Precedent, Does Not Implicate a Significant Question of Constitutional Law, and Does Not Present an Issue of Substantial Public Interest.

1. Dismissal of Mandawala's Claims Due to Insufficient Service of Process Was Legally and Substantively Correct.

The Court of Appeals' decision affirming the dismissal of Mandawala's claims against Era Living due to insufficient service of process is premised on long-standing Washington precedent. "Proper service of the summons and complaint is a prerequisite to a court's obtaining jurisdiction over a party." *Harvey v. Obermeit*, 163 Wn. App. 311, 318, 261 P.3d 671 (2011); *Interior Warehouse Co. v. Hays*, 91 Wash. 507, 512, 158 P. 99 (1916) (Jurisdiction over a party can "only be obtained by service of proper process upon it"). CR 4(d)(1) and (2) in combination provide that "[t]he summons and complaint shall be served together" and that "[p]ersonal service of summons and other process shall be as provided

in RCW 4.28.080-.090, 23B.05.040, 23B.15.100, 46.64.040, and 48.05.200 and .210, and other statutes that provide for personal service."

Of these statutes, RCW 4.28.080(9), which applies to service of process against a company, governs Mandawala's service efforts. RCW 4.28.080(9) requires that process against a company "shall be served . . . to the president or other head of the company or corporation, the registered agent, secretary, cashier or managing agent thereof or to the secretary, stenographer or office assistant of the president or other head of the company or corporation, registered agent, secretary, cashier or managing agent." Statutory service requirements, like those in RCW 4.28.080, are mandatory requirements that "must be complied with in order for the court to finally adjudicate" a dispute between parties. *Weiss v. Glemp*, 127 Wn.2d 726, 734, 903 P.2d 455 (1995).

When a defendant challenges proper service, as Era Living did, the plaintiff has the initial burden of proof to establish a prima facie case of proper service. *Northwick v. Long*, 192 Wn. App. 256, 261, 364 P.3d 1067 (2015). As the Court of Appeals accurately stated, Mandawala "did not introduce any evidence, such as a declaration of the process server, to establish a prima facie case of proper service." Opinion at 5. The Court of Appeals further noted that, beyond his failure to properly serve Era Living, none of Mandawala's mailings contained a summons as required

by CR 4(d)(1). *Id.* at 7. Due to the deficiencies in Mandawala's service of process, the Court of Appeals correctly concluded that Mandawala failed to meet his burden of showing a prima facie case of proper service and affirmed the dismissal of Mandawala's claims consistent with Washington precedent. Opinion at 8.

2. **<u>The Court of Appeals Correctly Held that CR 15 and CR 4(h) Do Not Apply to Allow Mandawala to Amend His Summons or His Service of Process.</u>**

The Court of Appeals properly affirmed the trial court's refusal to allow Mandawala to amend his summons and service of process under CR 15 and CR 4(h). Petition at 15-18. As the Court of Appeals held, CR 15 allows a party to amend its pleadings, but the trial court's dismissal was based on insufficient service of process, not the fact that Mandawala incorrectly named Era Living as "Era Living at ATP." Nor does CR 15 apply to amendment of a summons. Opinion at 9. Further, while CR 4(h) grants the trial court discretion to "allow any process or proof of service thereof to be amended," the rule does not permit a party to amend defective service of process. *Id.* at 10; *see Sammamish Pointe Homeowners Ass'n v. Sammamish Pointe LLC*, 116 Wn. App. 117, 124, 64 P.3d 656 (2003) (citing *Whitney v. Knowlton*, 33 Wash. 319, 322, 74 P.

469 (1903)) ("[a] failure to accomplish personal service of process is not a defect that can be cured by amendment of paperwork").[3]

Mandawala cites to two cases—without any explanation or argument—that he appears to contend are in conflict with the Court of Appeals' decision with regard to amendment of his pleadings. *See* Petition at 19 citing *In re Marriage of Markowski*, 50 Wn. App. 633, 635-36, 749 P.2d 754 (1988) and *In re Marriage of Morrison*, 26 Wn. App. 571, 573-78, 613 P.2d 557 (1980). Neither case conflicts with the Court of Appeals' decision.

In *Markowski*, Mrs. Markowski failed to serve Mr. Markowski with the petition for dissolution or a summons; Mr. Markowski filed a motion to vacate the petition for lack of personal jurisdiction. 50 Wn. App. at 636-37. Mrs. Markowski unsuccessfully argued that her petition for dissolution was actually a CR 15(a) amendment to her earlier petition for legal separation, which had been properly served on Mr. Markowski several months earlier, thereby eliminating the need for service of a new summons. *Id.* at 636. The court disagreed. Similarly, Mandawala's various

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[3] Mandawala cites to various federal cases, none of which addresses amending process in a way that would overcome a plaintiff's failure to serve a summons. Petition at 15-18. The cases Mandawala cites address a plaintiff's ability to amend his or her complaint as a matter of course when the proposed amendment does not affect claims against defendants who have already filed responsive pleadings. *See* Petition at 16 citing *Williams v. Bd. of Regents of Univ. Sys. of Ga.*, 477 F.3d 1282, 1291 (11th Cir. 2007) and *Thomas v. Home Depot USA Inc.*, 527 F.Supp.2d 1003, 1005 (N.D. Cal. 2007). Amendment of pleadings is not at issue here.

mailings to Era Living were not CR 15(a) amendments to prior, properly served pleadings such that no summons would be necessary. There is no conflict between the two decisions.

In *Morrison,* the Court of Appeals affirmed the trial court's dismissal of the case where the defendant was served in his personal capacity instead of in his representative capacity as a trustee and the plaintiff had not submitted a motion to amend service to reflect the proper capacity of the defendant. 26 Wn. App. at 574. *Morrison* is not instructive because the trial court's dismissal of Mandawala's claims was based on his failure to properly serve Era Living with the complaint and summons, not his misidentification of the defendant. There is no inconsistency between *Morrison* and the Court of Appeals' decision.

Mandawala does not and, indeed, cannot establish that the Court of Appeals' holdings in the above respects conflict with other decisions of this Court or the Court of Appeals, present a question of constitutional law, or implicate a substantial public interest.

B. Mandawala's Remaining Arguments Are Raised for the First Time on Appeal and Should be Disregarded, and, In Any Event, Do Not Meet the Criteria in RAP 13.4(b).

Mandawala's remaining arguments are that: (1) Era Living waived the insufficient service of process defense by dilatorily raising it in its motion to dismiss, (2) counsel for Era Living's communications with him

allegedly violated 42 U.S.C. § 1985 and (3) constituted improper legal advice. Petition at 12-14, 19-24. At the outset, each of these arguments should be disregarded as they were not argued to the trial court. *Sourakli v. Kyriakos, Inc.*, 144 Wn. App. 501, 509, 182 P.3d 985 (2008) *review denied* 165 Wn.2d 1017 (2009) ("[a]n argument neither pleaded nor argued to the trial court cannot be raised for the first time on appeal."). And while novel arguments may be raised on appeal when they address a "manifest error affecting a constitutional right," no constitutional issue is presented or even argued here.[4] RAP 2.5(a). Should the Court consider the merits of these new arguments, they do not meet any of the criteria in RAP 13.4(b) and Era Living requests that Mandawala's Petition be denied.

1. **Era Living Did Not Waive Insufficient Service of Process Defense By Being Dilatory.**

Mandawala contends that, under CR 12(a), Era Living waived its insufficient service of process defense because it raised it for the first time in its motion to dismiss, which Mandawala contends was dilatorily filed more than 20 days after alleged service. Petition at 12-14. Proper service

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[4] Indeed, the only time Mandawala refers to any implication of constitutional law in his Petition is in the heading to his argument that counsel for Era Living's communications with him violated 42 U.S.C. § 1985(2), in which he references the "Equal Protection Clause in 14th Amend." Petition at 19. The nature of Mandawala's 42 U.S.C. § 1985(2) argument is discussed more fully below. Suffice it to say, however, that he advances no argument to support the reference in the heading and no constitutional impact is generally apparent.

of the summons and complaint starts the timeline for filing a responsive pleading under CR 12(a). As the Court of Appeals correctly noted, Mandawala neither properly served Era Living nor included a summons in any of his various mailings to Era Living. Opinion at 7. Accordingly, Era Living had no duty to answer Mandawala's complaint within 20 days and its motion to dismiss timely raised the defense of insufficient service of process under CR 12(b)(5).

Further, a defendant waives a defense through dilatory conduct only where such conduct is "purposeful or misleading" and the defendant's conduct is "inconsistent with the assertion of the defense." *Lybbert v. Grant Cty. State of Wash.*, 141 Wn.2d 29, 46, 1 P.3d 1124 (2000). Counsel for Era Living never misled Mandawala about Era Living's assertion of its insufficient service defense. Rather, in every communication sent to Mandawala, Era Living's counsel asserted that proper service had not been completed and promptly moved to dismiss for lack of proper service after it became clear that Mandawala had no intention of properly serving Era Living. CP 108, 283-84.[5]

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[5] Mandawala's further suggestion that Era Living's counsel's communications with him were threatening, intimidating, or deceitful (Petition at 15) was expressly addressed and discredited by the Court of Appeals based on the clear evidence in the record of those communications. Opinion at 12.

Mandawala relies on inapposite federal cases for his waiver argument. He first cites *U.S. v. Ziegler Bolt & Parts Co.*, in which the court affirmed dismissal of the plaintiff's claims because the defendant was not properly served, even though the defendant participated in litigation for two years prior to seeking dismissal. 111 F.3d 878 (Fed. Cir. 1997). *Ziegler* supports affirming dismissal of Mandawala's claims.

Mandawala's reliance on *Yeldell v. Tutt*, 913 F.2d 533 (8th Cir. 1990), and *Trustees of Cent. Laborers' Welfare Fund v. Lowery*, 924 F.2d 731 (7th Cir. 1991), is also misplaced. In both cases, the courts disallowed insufficient service of process defenses because the defendants had been dilatory in raising the defense, but the facts of each are materially different than this one. In *Yeldell*, the defendants participated in discovery, filed various motions, participated in a five-day trial, and filed post-trial motions before seeking to assert a service of process defense once the case was on appeal. 913 F.2d at 539. In *Lowery*, the court refused to set aside a default judgment against the defendant based on a theory of insufficient service of process where "the defendants participated in post-judgment proceedings [for] almost six years during which time [defendants] never raised a question as to the adequacy of the original service." 924 F.2d at 732. Era Living, in contrast, has consistently asserted its insufficient service of process defense and moved to dismiss on the same basis prior to

filing any responsive pleading or engaging in any litigation of Mandawala's claims.[6]

Finally, while Mandawala did not raise to the Court of Appeals the specific waiver argument that he now raises in his Petition,[7] Mandawala nonetheless appears to contend that the Court of Appeals' decision is somehow contradicted by *Raymond v. Fleming*, 24 Wn. App. 112, 600 P.2d 614 (1979), but he advances no argument supporting this assertion. Petition at 15. In *Raymond*, the Court of Appeals held that the defendants waived their insufficient service of process defense by engaging in dilatory conduct where they repeatedly delayed responding to the plaintiff's complaint, failed to respond to plaintiff's discovery requests, and obtained two continuances before eventually raising an insufficient service of process defense more than nine months after entering a notice of appearance. 24 Wn. App. at 115. Those facts do not exist here.

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[6] The other cases Mandawala cites are inapplicable to the issues considered by the Court of Appeals. *U.S. v. Riggs* is a Fifth Circuit criminal case addressing equitable tolling on the statute of limitations for motion of collateral relief. 314 F.3d 796, 799 (5th Cir. 2002). *Manning v. Epps* is a Fifth Circuit criminal case addressing equitable tolling of the Antiterrorism and Effective Death Penalty Act. 688 F.3d 177, 182 (5th Cir. 2012).

[7] To the Court of Appeals, Mandawala argued that Era Living engaged in dilatory conduct and thereby waived the insufficient service of process defense by making allegedly deceptive statements in its correspondence with him. The Court of Appeals correctly rejected this argument, concluding that the correspondence "was neither deceitful nor dilatory." Opinion at 12.

2. <u>Era Living and its Counsel Did Not Violate 42 U.S.C. § 1985 or Give Improper Legal Advice.</u>

Mandawala appears to allege that, under 42 U.S.C. § 1985(2), Era Living and its counsel unlawfully conspired to prevent him from exercising his civil rights[8] and that counsel for Era Living violated ethical rules by telling Mandawala that he had not completed proper service, which he contends amounted to legal advice. Petition at 19-24. There was no conspiracy or violation of the Rules of Professional Conduct ("RPC").

The sole basis for Mandawala's assertions is Era Living's counsel's emails to him in which counsel informed Mandawala, a pro se plaintiff, that he had not successfully completed service on Era Living. As a courtesy, counsel provided Mandawala with a link to the civil rules, but, correctly, did not provide Mandawala with legal advice regarding service (for example, there is no discussion of how to properly serve a party or which rule to follow). CP 108-109, 112. When Mandawala contended in his response to counsel's initial letter that he had completed proper service, counsel again stated Era Living's position that proper service had not been completed and again referred Mandawala to the link to the Civil

[8] 42 U.S.C. § 1985(2), in relevant part, prohibits individuals from conspiring to obstruct or impede "the due course of justice . . . with intent to deny to any citizen the equal protection of the laws, or to injure him or his property for lawfully enforcing, or attempting to enforce, the right of any person, or class of persons, to the equal protection of the laws[.]"

Rules she had previously provided. CP 112. This was not intimidation or legal advice, but normal communication between parties in litigation—which would have occurred even if Mandawala was represented by an attorney—in which they professionally express their respective positions. After this correspondence, Era Living provided Mandawala with time to complete proper service before filing its Motion to Dismiss. These communications do not evidence any conspiracy that would violate 42 U.S.C. § 1985(2) or constitute legal advice.

VII. CONCLUSION

Mandawala fails to show that any of the criteria for granting review of the Court of Appeals' decision set forth in RAP 13.4(b) are satisfied. The Court of Appeals' decision does not conflict with existing law of this Court or the Court of Appeals. Nor does this case present any significant questions of constitutional law or substantial public interest. Indeed, the Court of Appeals signaled that this case presents no issue of substantial public interest when it chose not to publish it. Rather, this case involves a plaintiff's repeated failure to satisfy the service of process requirements established in CR 4 and RCW 4.28.080(9), despite notice. For the reasons stated here, Era Living respectfully requests that the Court deny Mandawala's Petition for Review.

DATED this 31st day of December, 2020.

Respectfully submitted,

s/ Skylar Sherwood ____________
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CERTIFICATE OF SERVICE

I, Marina Krylov, certify that:

1. I am an employee of Fox Rothschild LLP, attorneys for Respondent ERA LIVING, LLC in this matter. I am over 18 years of age, not a party hereto, and competent to testify if called upon.

2. On December 31st, 2020, I served a true and correct copy of the foregoing document on the Appellant, via mail and email, and addressed as follows:

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San Antonio, TX 78229

Symon Mandawala
Post Office Box 5512
San Antonio, Texas 78229

smandawala@yahoo.com

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

SIGNED at Seattle, Washington, this 31st day of December, 2020.

Marina Krylov

FOX ROTHSCHILD LLP

December 31, 2020 - 1:48 PM

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