Supreme Court No. 996563

Court of Appeals No. 79696-8-I

IN THE SUPREME COURT
OF THE STATE OF WASHINGTON

ROSE DAVIS, as the Personal Representative of the Estate of Renee L. Davis, deceased,

Plaintiff-Respondent,

v.

KING COUNTY, *et al.*,

Defendants-Petitioners.

ANSWER TO PETITION FOR REVIEW

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I. IDENTITY OF RESPONDENT

Respondent Rose Davis, Personal Representative for the Estate of her deceased sister, Renee Davis, answers urging the Court to deny review.

II. COURT OF APPEALS DECISION

The Court of Appeals reversed summary judgment in favor of Defendant King County, holding that Ms. Davis' claims were not barred by RCW 4.24.420. *Davis v. King Cty.*, 16 Wn. App. 2d 64, 479 P.3d 1181 (2021).

III. ISSUES PRESENTED FOR REVIEW

1. Is the Court of Appeals' Opinion in conflict with a published decision of the Court of Appeals such that it warrants acceptance under RAP 13.4(b)(2)? No.

2. Does the Court of Appeals' Opinion involve an issue of substantial public interest that should be determined by the Supreme Court such that it should be accepted for review under RAP 13.4(b)(4)? No.

IV. STATEMENT OF THE CASE

A. INITIAL CONTACT WITH THE KING COUNTY SHERIFF'S OFFICE

At 6:30 p.m. on October 21, 2016, King County Sheriff's

Office ("KCSO") Deputy Nicholas Pritchett was approached by a young man, T.J. Molena, who was worried about his girlfriend. CP at 247. Minutes earlier, T.J.'s girlfriend—Renee Davis, a twenty-three-year-old Muckleshoot tribal member and mother of three, with a fourth on the way—sent T.J. a text message: "Well come and get the girls or call 911 I'm about to shoot myself." *Id.* at 347. Renee sent him another text message at 6:28 p.m. with a photo of a superficial injury of unknown origin, which said: "This is to show you I'm not lying." *Id.*; *see also id.* at 248. Worried about Renee, her children, and his unborn son, T.J. sought KCSO's help. *Id.* at 249.[1]

Pritchett was familiar with both Renee and T.J. *Id.* at 246. Pritchett had responded to incidents at Renee's home in which she was a victim of domestic violence, including when Renee's ex-boyfriend and the father of two of her children strangled her, as well as other "DV assaults where he was pretty brutal to her." *Id.*; *see also id.* at 393-96. A few months prior to her death, Renee learned that this ex-boyfriend would soon be released from prison, so she

[1] It is common for residents of the Muckleshoot Indian Reservation to personally seek out law enforcement officers for help rather than call 911. CP at 248.

obtained a Washington State-issued concealed carry license and legally purchased a handgun. *See id.* at 349.

T.J. showed Pritchett the text messages from Renee. *Id.* at 248. He also told Pritchett that Renee had access to a handgun, that she had two of her children with her, and that she was pregnant. *Id.* at 248, 399-400, 404.

B. THE DEPUTIES ARRIVE AND ENTER RENEE'S HOME

At 6:37 p.m., Pritchett advised dispatch of a suicidal, possibly armed, female who had two children with her. *Id.* at 311; *see also id.* at 250. Pritchett informed dispatch that he would be conducting a welfare check and provided Renee's full name and birthdate—*information he could recall from memory based on prior contacts*. *Id*. At 6:44 p.m., Pritchett arrived in Renee's neighborhood and waited for backup. *Id.* at 311. While waiting, he observed no signs of distress coming from the home. *Id.* at 252.

KCSO Deputy Timothy Lewis was commuting home when he overheard Pritchett's radio transmissions and decided to respond. *Id.* at 263-64. Lewis was not working that evening; he had been at the KCSO shooting range where, for approximately eight hours, he fired over 400 rounds from an AR-15 assault rifle and his Glock 9-millimeter. *Id*. at 263.

At 6:52 p.m., without formulating any kind of plan or relaying any information to each other, the Deputies rushed to Renee's front door. *Id.* at 252-54, 266-68, 311, 311-12. They could not see into or hear any noise from the house, or anything that indicated anyone was in distress inside. *Id.* at 253, 267. The Deputies began to pound loudly on the front door, siding, and windows of the home. *Id.* at 268-69. At no point did the Deputies announce: "Renee, this is a welfare check," "Renee, we're here to help you," or "Renee, we are here to check on you and your children." *Id.* at 254, 270. The Deputies also did not take into account the effect loud banging and knocking by two men would have on a young pregnant woman in a suicidal state. *Id.* at 270. They knocked, banged, and yelled for approximately four minutes. *Id.* at 269, 311-12. They did not attempt any other means of communication. *Id.* at 311-12.

At 6:54 p.m., Lewis attempted to break into Renee's home by removing a screen on the living room window. *Id.* at 270. As Lewis pried the screen off the window, he saw Renee's two children in the living room—uninjured—and asked them to open the door. *Id*. After Renee's three-year-old opened the door, the Deputies rushed into the home with firearms drawn. *Id.* at 270, 312. Lewis

immediately placed the children behind him in the front door area of the house, where they were safe. *Id.* at 256, 270, 272.

The only person in the house at this point was Renee, who posed no threat to anyone but herself. *Id.* at 250, 311.

Pritchett and Lewis rushed to "clear" the house. *Id.* at 273. Pritchett reached the door to Renee's bedroom, kicked off a child safety device from the knob on the door, and called to Lewis. *Id.* at 256, 273. Lewis joined Pritchett at the entrance of Renee's bedroom, both with guns drawn. *Id.* at 273.

C. RENEE IS FATALLY SHOT

In the bedroom, the Deputies observed Renee lying in her bed, covered in a blanket up to her neck, staring blankly at the door. *Id.* at 256, 273. They saw no evidence that she was injured or in distress. *Id*. The Deputies then, continuing to escalate the situation, shouted various commands at Renee, including that she "show her hands!" *Id.* at 242. According to Lewis, Renee did not respond; according to Pritchett, Renee said "no." *Id.* at 242, 274. Lewis pointed his firearm at Renee as Pritchett ripped the blanket off of her. *Id.* at 257, 273-74. Although the Deputies each claim to have seen Renee with a gun at this point, they recall things differently:

- According to Lewis: Renee had a gun near her right hand, "either laying on her bed or against her leg or somewhere down," with the muzzle facing the foot of the bed. *Id.* at 275. Lewis thought this positioning of the firearm may have been unintentional. *Id.*

- According to Pritchett: Renee had a gun resting between her legs in her right hand. *Id.* at 257.

The Deputies reported that Renee had a magazine in her left hand and claimed that she raised the gun and somehow pointed it at both of them at the same time. *Id.* at 257, 275. At that point:

- According to Lewis: Pritchett and Lewis each yelled at Renee to "drop the gun," then simultaneously fired. *Id.* at 258, 275.

- According to Pritchett: Only Pritchett yelled "gun," moved, and fired along with Lewis. *Id*.

Pritchett and Lewis shot Renee three times at close range, causing Renee to slump over and say, "It's not even loaded," before falling off the bed onto the floor. *Id.* at 258-59.

Less than one minute transpired between when the Deputies entered Renee's home to when they fatally shot her. *Id.* at 312.

In the aftermath, there were three stories about what happened to the gun:

- According to the Pritchett, he had a conversation with Lewis about what to do with the gun and they decided that Pritchett should put the gun in his utility belt, which he did. *Id.* at 258.

- According to Lewis, he did not see Pritchett pick the gun up off the bed and had no conversation with Pritchett about the gun. *Id.* at 258, 276.

- According to Auburn Police Officer Derek Pedersen (who arrived later), the gun was in Renee's hand. *Id.* at 351.

At 6:59 p.m., Pritchett allowed medical aid to enter, at which point the Deputies went outside and talked to each other about the shooting—*i.e.*, got their story about the alleged "pointed gun" straight—which violated KCSO policy. *Id.* at 272, 277, 302, 312.

Less than twenty minutes elapsed between when T.J. relayed his concerns to Pritchett and when Renee was fatally shot. *Id.* at 311-12. Less than a minute elapsed between when the Deputies arrived at the home and approached the front door. *Id.* About a minute elapsed between when they entered the home and opened fire on Renee. *Id*.

D. PROCEEDINGS BEFORE THE TRIAL COURT

On January 3, 2018, Ms. Davis filed suit in King County Superior Court for negligence, battery, and outrage. King County answered on February 2, 2018, asserting as an affirmative defense that "[t]he plaintiff's claims are barred as they arise out of Renee Davis' commission of illegal and felonious acts." CP 40.

Because King County failed to identify a specific felony in its Answer, on January 22, 2019, Plaintiff questioned King County's CR 30(b)(6) designee as to what "illegal and felonious acts" it was asserting Renee committed:

> A. So the part that I understand on this is that she raised and pointed a handgun, or deadly weapon, at the officers, which was a felonious act, and they responded.
>
> Q. And what is the felony that that is, in the County's understanding of it?
>
> A. That would be a felonious assault, so pointing a deadly weapon at an officer or any individual.
>
> Q. Is that a -- do you know the specific felony that -- is it a --
>
> A. Should be Assault 1 --
>
> Q. Okay.
>
> A. -- assault with a deadly weapon.
>
> Q. Is that the only felony that the County is alleging occurred here, Assault 1?
>
> A. I'd say that's the only felony -- . . .

CP 295.

Because "a 30(b)(6) deposition binds the entity," *Naini v. King Cty. Pub. Hosp. Dist. No. 2*, No. 19-0886, 2019 WL 6877927, at *3 (W.D. Wash. Dec. 17, 2019) (unpublished), in responding to the County's motion for summary judgment on RCW 4.24.420 Ms. Davis wrote:

> [T]he only felony that Renee is accused here—and only here—of committing, Assault in the First Degree, requires

> "intent to inflict great bodily harm," RCW 9A.36.011(1), but that charge cannot be sustained when a subject's intent is "to commit suicide by provoking police into shooting h[er]." *State v. Anderson*, 137 Wn.App. 1048, 2007 WL 831730 (2007). Here, **the County has admitted** Renee's intent was to commit suicide and not to inflict bodily harm. **The County's own expert** has opined too, "on a more-probable-than-not basis," that if Renee did point a gun she "intended to provoke law enforcement to use lethal force."

CP 536 (emphasis added).[2]

The trial court granted King County's motion on the basis of RCW 4.24.420. CP at 524. The trial court observed that "this case illustrates in a number of respects some issues that you can tell I find somewhat troubling in terms of holes or gaps in the law." RP at 53. The trial court also explained that it was "troubled by the fact that RCW 4.24.420 by its terms forecloses any inquiry into [any] responsibility that the deputies or the county may have had." *Id.* at 54. The trial court specifically noted that issues regarding the reasonableness of the Deputies' conduct were present, which are

[2] Petitioner's repeated mischaracterization of Rose Davis' position on this issue is disingenuous at best. Rose Davis did not "admit[] and argue[] to the trial court that her specific intent was to create an apprehension of harm to provoke the deputies into shooting her . . . and present[] expert testimony to bolster that claim." Petition for Review, at 8. That was **Petitioner's argument**, supported by **Petitioner's expert**. Renee Davis is dead. Nobody will ever know her intent. Neither Renee's sister nor her counsel claim divine powers. Rose Davis simply submitted to the trial court that even accepting Petitioner's argument as true, it would still not be enough to sustain the only felony asserted, Assault in the First Degree.

reserved exclusively "for the trier of fact" to determine. *Id.* at 55. The trial court concluded by explaining "if a court is going to make new law in this issue, it should be in an appellate court, not a Superior Court." *Id.*

E. COURT OF APPEALS DECISION

The Court of Appeals reversed the trial court's order, concluding that because "[i]ntent is a question of fact, normally reserved for the jury . . . [t]he trial court erred in concluding Davis had the requisite specific intent to commit assault." *Davis v. King Cty.*, 479 P.3d 1181, 1186-87 (Wash. Ct. App. 2021) (citing *Morissette v. U.S.*, 342 U.S. 246, 274, 72 S. Ct. 240, 96 L. Ed. 288 (1952); *State v. Bea*, 162 Wash. App. 570, 579, 254 P.3d 948 (2011); and *Wingert v. Yellow Freight Systems, Inc.*, 146 Wash.2d 841, 849, 50 P.3d 256 (2002)).

IV. ARGUMENT

A. THE COURT OF APPEALS' OPINION DOES NOT CONFLICT *WITH LEE V. CITY OF SPOKANE*.

The entire analysis of RCW 4.24.420 in *Lee v. City of Spokane* was as follows: "By the plaintiffs' own account, Mr. Lee pointed a gun at Officer Langford and Ms. Lee after threatening to shoot them. This is first degree assault, a felony." 101 Wash. App.

158, 177, 2 P.3d 979, 991 (2000) (citing RCW 9A.36.011). As the Court of Appeals acknowledged in its Opinion, *Lee* "did not discuss intent, much less, conclude that intent could be inferred by the trial court on summary judgment."[3] *Davis*, 479 P.3d at 1186. In addition, unlike *Lee*, Respondent here has constantly and adamantly maintained that inconsistencies in the involved officers' testimony requires a jury to determine whether Renee pointed a gun at all.[4] And the Court of Appeals agreed. *See Davis*, 479 P.3d at 1187 ("While a jury might find the officers' testimony credible . . . it might also conclude to the contrary.").

To be clear, the Court of Appeals did not hold, and Respondent does not argue, that a jury may not infer intent. To the contrary, as the Court of Appeals found, case law makes absolutely clear that while intent is always jury question, **a jury** is free to infer

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[3] As the Court of Appeals explained in *Watness v. City of Seattle*:

> *Lee* contains no discussion of whether the aggressor's *mens rea* should be considered when adjudicating a defendant's immunity under RCW 4.24.420. Generally, in cases where a legal issue is not discussed in an opinion, the case is not controlling on a future case where the legal issue is properly raised. *Lee* does not discuss *mens rea* under RCW 4.24.420 and is not controlling here.

16 Wash. App. 2d 297, 481 P.3d 570, 579 (2021) (citation omitted).

[4] Again, Respondent has never "admitted" that "Ms. Davis pointed a firearm at the deputies." Petition for Review, at 16. At most, Respondent has argued that "**if** Renee did point a gun" she did not possess "intent to inflict great bodily harm" required by RCW 9A.36.011(1)—the only felony that Petitioners were alleging at that time that Renee Davis committed. CR 536 (emphasis added).

intent from circumstantial evidence. *Davis*, 479 P.3d at 1186 (citing *Morissette*, 342 U.S. at 274; *Bea*, 162 Wash. App. at 579; and *Wingert*, 146 Wash.2d at 849). The authority cited by Petitioners themselves supports this rule. *See* Petition for Review, at 15 ("'**A jury** may infer criminal intent from a defendant's conduct where it is plainly indicated as a matter of logical probability.'") (quoting *Bea*, 162 Wn. App. at 579) (emphasis added); *see also generally id.* (citing to criminal cases upholding **jury verdicts** based on circumstantial evidence).

Numerous state jurisdictions also follow the rule that "[w]here intent of the accused is an element of the crime charged, its existence is a question of fact for the jury. The question of intent cannot be ruled upon as a matter of law." *State v. Howe*, 247 N.W.2d 647, 655 (N.D. 1976); *see also Pratt v. State*, 492 N.E.2d 300, 302 (Ind. 1986) ("[W]hether or not [a defendant]'s intoxication prevented him from forming the requisite *mens rea* was a question of fact . . . ."); *Shackelford v. State*, 486 N.E.2d 1014, 1017 (Ind. 1986) ("Whether appellant's voluntary intoxication was sufficient to preclude the formulation of the requisite *mens rea* is a question of fact for the jury."); *Rush v. Alaska Mortgage Group*, 937 P.2d 647, 651 (Alaska 1997) (same).

U.S. District Courts have likewise universally held that "[w]hether a party formed the adequate *mens rea* is a question of fact that cannot be decided [as a matter of law]." *Greenbank v. Great Am. Assurance Co.*, No. 18-0239, 2019 WL 4542690, at *7 (S.D. Ind. Sept. 19, 2019) (unpublished); *see also Peterson v. Port of Benton Cty.*, No. 17-0191, 2019 WL 1299373, at *6 (E.D. Wash. Mar. 21, 2019) (unpublished) ("Whether the defendant acted with retaliatory intent is a question of fact . . . .") (quotation omitted); *Cincinnati Ins. Co. v. Orten*, No. 17-0036, 2019 WL 6895980, at *6 (M.D. Tenn. Feb. 5, 2019) (unpublished) ("*Mens rea* is a question of fact properly decided by a criminal jury."); *Prudential Ins. Co. of Am. v. Govel*, No. 16-0297, 2017 WL 2455106, at *8 (N.D.N.Y. June 6, 2017) (unpublished) ("[T]he question whether a defendant possessed a 'reckless' *mens rea* is a question of fact properly left to the trier of fact . . . .") (quotation omitted); *Whitney Info. Network v. Weiss*, No. 06-6569, 2008 WL 731024, at *7 (E.D.N.Y. Mar. 18, 2008) (unpublished) ("[T]he nature and extent of Defendant's *mens rea* is a question of fact not appropriate for disposition under Rule 12(b)(6).").

B. THE COURT OF APPEALS' OPINION DOES NOT CONFLICT WITH *WATNESS V. CITY OF SEATTLE*.

In *Watness*, the decedent's estate submitted that "diminished capacity, due to a mental illness," impaired the decedent's "ability to form the specific intent to commit a crime" and submitted evidence of the decedent's "incapacity to form intent to commit felonious assault or attempted murder at the time of her shooting" in the form of expert opinion. 481 P.3d at 580. The trial court excluded the estate's expert opinion and granted summary judgment on behalf of the City of Seattle and its officers.

The Court of Appeals reversed the trial court's evidentiary rulings, holding that while "**[a] jury** may infer criminal intent from a defendant's conduct," the estate's evidence that the decedent "was suffering from a psychosis at the time of the shooting that impaired her ability to form this *mens rea*" was relevant under ER 702 to show "incapacity to form intent to commit felonious assault or attempted murder." *Id.* at 580 (emphasis added, quotation omitted). The Court of Appeals also held that the expert testimony in the form of "a psychological autopsy" was sound and admissible under *Frye v. U.S.*, 293 F. 1013 (D.C. Cir 1923). *Id.* at 580-81.

Here, Petitioners submit that because the Respondent "lacks the diminished capacity evidence required by *Watness*" the Court of Appeals' Opinion is in conflict with *Watness*. Petition for Review, at 18. Not so. Nothing in *Watness* upends the rule that while "**a jury** may infer it[tent] from . . . circumstantial evidence," determining intent is within the exclusive province of a jury. *Watness*, 481 P.3d at 580 (emphasis added). While evidence in the form of expert testimony to support a diminished capacity defense is certainly helpful in making that argument to a jury, nothing in *Watness* requires a plaintiff (1) to assert a diminished capacity defense, or (2) provide intent evidence in the form of expert opinion.

This much is true: under the rule affirmed in both *Davis* and *Watness*, "any plaintiff that commits a felonious act c[an] avoid summary judgment by the mere argument she did not have the requisite intent." Petition for Review, at 19. Indeed, it has been clearly established for decades that "[h]owever clear the proof may be, or however incontrovertible may seem to the judge to be the inference of a criminal intention, the question of intent can never be ruled as a question of law, but must always be submitted to the jury." *Morrissette*, 342 U.S. at 274. While Petitioners may not like this rule, it is well settled that the right to have juries and not judges

determine criminal intent is fundamental. *Sullivan v. Louisiana*, 508 U.S. 275, 277 (1993).

C. A DEFENDANT IS BARRED FROM EMPLOYING THE FELONY BAR DEFENSE AT SUMMARY JUDGMENT WHERE INTENT IS AN ELEMENT OF THE UNDERLYING ALLEGED FELONY.

Petitioner's argument that "*Davis* effectively obliterates the defense" is hyperbole. Petition for Review, at 20. That the question of intent cannot be determined as a question of law does not mean that RCW 4.24.420 cannot apply where the underlying alleged felony contains a specific intent element. Juries can be, and very often are, instructed on the statute. *See* WPI 16.01. The Court of Appeals was correct that "[t]he plain language of the statute does not require that a person be convicted of a felony or admit to felonious conduct before RCW 4.24.420 is a complete defense to a civil action." *Davis*, 479 P.3d at 1187. But absent a conviction or an admission, the defense is simply unavailable *at the summary judgment* stage.

Earlier this month, our state legislature passed ESSB 5263, amending RCW 4.24.420 to "clarify to the judiciary" that alleged felonious intent in an action arising out of law enforcement activities resulting in personal injury or death cannot "be decided on summary

judgment by a judge, but need[s] to be decided by a finder of fact, primarily the jury." H.B. Rep. on Engrossed Substitute Senate Bill 5263, 67th Leg., Reg. Sess., at 3 (Wash. 2021). In addition, the new RCW 4.24.420 raises the defendants' burden by requiring that "the finder of fact" determine "beyond a reasonable doubt that the person injured or killed was engaged in the commission of a felony." Engrossed Substitute Senate Bill 5263, 67th Leg. (Wash. 2021). The legislation is currently on Governor Jay Inslee's desk and is expected to be signed into law next week. Since on remand the trial court will very likely be required to apply this amended language, Petitioner's appeal to RAP 13.4(b)(4) falls flat. *In re Dependency of A.M.M.*, 182 Wash. App. 776, 789, 332 P.3d 500, 507 (2014) (citing *Bradley v. Sch. Bd. of City of Richmond*, 416 U.S. 696, 711, 94 S.Ct. 2006, 40 L.Ed.2d 476 (1974); *Wash. State Farm Bureau Fed'n v. Gregoire*, 162 Wash.2d 284, 304, 174 P.3d 1142 (2007)).

V. CONCLUSION

This Court should decline review. The Court of Appeals' Opinion is in line with every single court to have analyzed the issue. Petitioner also fails to present an issue of substantial public interest, especially considering that RCW 4.24.420 will in all likelihood no

longer take its current form by the time the Court reviews the Petition.

Respectfully submitted this 12th day of May, 2021.

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CERTIFICATE OF SERVICE

I , Wendy Foster, declare as follows:

1. I am now and at all times herein mentioned a legal and permanent resident of the United States and the State of Washington, over the age of eighteen years, not a party to the above-entitled action, and competent to testify as a witness.

2. I am employed with the law firm of Galanda Broadman PLLC, 8606 35th Avenue NE, Ste. L1, Seattle, WA 98115.

3. Today, I served the foregoing document, via email on the following parties:

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The foregoing Statement is made under penalty of perjury and under the laws of the State of Washington and is true and correct.

Signed at Seattle, Washington, on May 12, 2021.

s/Wendy Foster
Wendy Foster

GALANDA BROADMAN

May 12, 2021 - 10:12 AM

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