SUPREME COURT NO. 100085-5
COURT OF APPEALS NO.: 814061

IN THE COURT OF APPEALS
OF THE STATE OF WASHINGTON

3320 MLK, LLC, a Washington Limited Liability Company; Carl Raymond Haglund, et. al.,

Appellants.

v.

HELSELL FETTERMAN, LLP a Washington Limited Liability Partnership, and BRANDON S. GRIBBEN, Individual and on Behalf of the Marital Community Comprised of BRANDON GRIBBEN and JANE DOE GRIBBEN,

Respondents.

RESPONDENTS' ANSWER TO PETITION FOR REVIEW

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I. IDENTITY OF RESPONDING PARTY

Defendants-Respondents are Helsell Fetterman, LLP and Brandon and Jane Doe Gribben (collectively "Mr. Gribben").

II. CITATION TO COURT OF APPEALS DECISION

3320 MLK, LLC v. Helsell Fetterman, LLP, No. 81406-1-l (Wn. App. July 19, 2021).

III. ISSUES PRESENTED FOR REVIEW

Whether this Court should deny Mr. Haglund's petition for review under RAP 13.4, where:

1. Mr. Haglund fails to establish any basis for review under RAP 13.4(b);

2. The Court of Appeals' decision is unpublished and therefore has no precedential value;

3. This case presents no substantial public interest under RAP 13.4(b)(4) because the present dispute involves no one but the parties to this action and will not recur; and

4. The Court of Appeals' decision was correct on its merits because Mr. Haglund failed to prove:

a. That Mr. Gribben's conduct in litigating the Underlying Action caused Mr. Haglund to lose that action;

b. That Mr. Gribben's conduct in connection with charging orders against all plaintiffs caused Mr. Haglund any damages through actual loss or because he supposedly would have won on appeal; or

c. That Mr. Gribben owed any legal duty to any plaintiff LLC other than 3320 MLK, LLC, because they were not his clients.

IV. STATEMENT OF THE CASE

Mr. Gribben adopts by reference his Statement of the Case in his Brief of Respondents to Division One of the Court of Appeals, a copy of which is attached at Appendix 1, and offers the following facts pertinent to the Petition for Review.

A. The Court of Appeals held that Mr. Gribben did not owe a legal duty to the third-party plaintiff LLCs.

The Court of Appeals held that Mr. Gribben did not owe

a legal duty to the 18 LLCs that were named plaintiffs in this action but were not clients of Mr. Gribben or parties to the Underlying Action:

> Haglund argues that, although Gribben did not represent 18 of the 19 LLCs listed in the complaint, a duty to them should be imposed. … The threshold question is the extent to which the transaction was intended to benefit the third party plaintiff. **Haglund has not satisfied this threshold question**. He has not provided sufficient evidence that Gribben was aware of his other LLCs or intended his counsel to benefit them as entities.

Petitioner's Appendix 1, p. 13, fn. 7 (citing *Trask v. Butler*, 123 Wn.2d 835, 842-43, 872 P.2d 1080 (1994)) (emphasis added).

B. The Court of Appeals held that Mr. Haglund would have been liable to Pacific 5000 regardless of any alleged professional negligence by Mr. Gribben.

The Court of Appeals held that Mr. Haglund's own reprehensible conduct, not any conduct of Mr. Gribben, resulted in Mr. Haglund's loss in the Underlying Action: "The loss of the case is clearly attributed by the trial court to Haglund's conduct relative to the transaction at issue and to his lack of

credibility in the proceedings. The record on appeal does not demonstrate any harm to Haglund flowing from Gribben's conduct." A-20.

C. The Court of Appeals held that the late filing of the supersedeas bond did not result in any harm to Mr. Haglund.

The Court of Appeals, in analyzing the harm element, looked for proof of actual harm caused by the filing of the charging bond against Mr. Haglund's LLCs and found that Mr. Haglund "has not offered evidence of any financial losses caused by the charging order applied to those sales or his other LLC interests." A-15.

V. ARGUMENT WHY REVIEW SHOULD BE DENIED

A. Supreme Court review of a Court of Appeals decision requires a "compelling need" to address matters that are of substantial public interest.

Supreme Court review of a Court of Appeals decision is an extraordinary step. Indeed, there must be a "compelling need" for this Court to decide an issue presented. *Wash. Appellate Prac. Deskbook* § 27.11 (1998).

Nothing in RAP 13.4 or in Washington law entitles Mr. Haglund to review by this Court simply because he disagrees with the Court of Appeals' decision:

> [I]t is a mistake for a party seeking review to make the perceived injustice the focus of attention in the petition for review. RAP 13.4(b) says nothing in its criteria about correcting isolated instances of injustice. This is because the Supreme Court, in passing upon petitions for review, is not operating as a court of error. Rather, it is functioning as the highest policy-making judicial body of the state.
>
> The Supreme Court's view in evaluating petitions is global in nature. Consequently, the primary focus of a petition for review should be on why there is a compelling need to have the issue or issues presented decided generally. The significance of the issues must be shown to transcend the particular application of the law in question. Each of the four alternative criteria of RAP 13.4(b) supports this view. The court accepts review sparingly, only approximately 10 percent of the time. Failure to show the court the "big picture" will likely diminish the already statistically slim prospects of review.

Id. (italics in original).

Mr. Haglund asserted grounds for Supreme Court review under RAP 13.4(b)(4) only. He does not offer any argument in

support of any other basis for this court to accept review. Mr. Haglund therefore concedes that review is not warranted under either RAP 13.4(b)(1), (2), or (3). Accordingly, this Court should accept a petition for review **only** "[i]f the petition involves an issue of substantial public interest that should be determined by the Supreme Court." RAP 13.4(b)(4).

B. The Court of Appeals' decision does not involve an issue of substantial public interest.

1. The Court of Appeals' decision is unpublished and has no precedential value.

First, as a practical matter, the Court of Appeals' decision is unpublished. Therefore, the decision cannot conflict with any other decision because, by its very nature, it is not precedent. GR 14.1(a); RCW 2.06.040; *State v. Fitzpatrick*, 5 Wn. App. 661, 668, 491 P.2d 262 (1971). Even though GR 14.1(a) permits citation to unpublished opinions of the Court of Appeals, the rule is clear that "[u]npublished opinions of the Court of Appeals have no precedential value and are not binding on any court." This unpublished decision does not –

and cannot – substantially affect the public interest because the unpublished opinion does not become a part of the common law of the State of Washington. "No matter how well reasoned, unpublished opinions of the Court of Appeals lack precedential value, in part because they merely restate well established principles." *State v. Nysta*, 168 Wn. App. 30, 44, 275 P.3d 1162, 1170 (2012) (citing GR 14.1(a)). Indeed, even if the Court of Appeals incorrectly decided the matter, there is no possibility that the Court of Appeals' decision creates supposedly bad precedent; it cannot and will not dictate the outcome of any other litigation.

2. This action is a private dispute between private parties and involves no substantial public interest under RAP 13.4(b)(4) that would warrant Supreme Court review.

Mr. Haglund has the burden of persuading the Court that its petition involves an issue of substantial public interest under RAP 13.4(b)(4) because "the issue is recurring in nature or impacts a large number of persons." *Wash. Appellate Prac. Deskbook* at § 27.11.

As discussed, by its very nature, an unpublished decision cannot affect anyone except the parties to that specific case. Nevertheless, assuming that one could establish a substantial public interest arising from an unpublished opinion, this Court has considered what constitutes an issue of public interest:

> The criteria to be considered in determining whether sufficient public interest is involved are: (1) the public or private nature of the question presented; (2) the desirability of an authoritative determination which will provide future guidance to public officers; and (3) the likelihood that the question will recur.

Dept. of Ecology v. Adsit, 103 Wn.2d 698, 705, 694 P.2d 1065 (1985); *Sorenson v. City of Bellingham*, 80 Wn.2d 547, 558, 496 P.2d 512 (1972). An issue that meets these criteria almost always implicates constitutional principles or the validity of legislative enactments. *In re Myers*, 105 Wn.2d 257, 714 P.2d 303 (1986); *Gen. Tel. Co. of the Northwest, Inc. v. City of Bothell*, 105 Wn.2d 597, 716 P.2d 879 (1986); *Adsit*, 103 Wn.2d at 705; *State ex rel. Chapman v. Superior Court*, 15 Wn.2d 637, 642-43, 131 P.2d 958 (1942); *State ex rel. Yakima*

Amusement Co. v. Yakima County, 192 Wash. 179, 73 P.2d 759 (1937).

This case is a private action between private parties. Even if the Court of Appeals' unpublished decision somehow could affect anyone but Mr. Haglund, his request for discretionary review still does not present a question that (1) is public in nature, (2) affects the conduct of governmental officers, or (3) recurs. Further, Supreme Court review under RAP 13.4(b)(4) usually presents a constitutional or statutory issue, but Mr. Haglund's petition fails to address any such issue, and this case does not remotely involve one.

Instead, Mr. Haglund's entire stated basis for Review under RAP 13.4(b)(4) is contained in two sentences:

> The Court has only rarely addressed supersedeas issues, and the effect of charging orders under RCW 25.15 is a question of first impression. The practicing bar and the public would benefit from the Court addressing those issues.

Petition for Review at 7.

Even if Mr. Haglund were correct that this Court rarely addresses the effect of supersedeas bonds and charging orders in legal-malpractice cases, that fact undermines rather than supports his Petition for Review. It suggests that the issue arises only rarely and therefore does not present any "compelling need to have the issue or issues presented decided generally." *Wash. Appellate Prac. Deskbook* § 27.11 (1998). Mr. Haglund provides no proof that Supreme Court review would "benefit" the public. He offers no proof that litigation abounds as to the effect of supersedeas bonds or charging orders, or that Washington courts require any guidance on the subject. Mr. Haglund cites no professional-negligence actions involving supersedeas bonds or charging orders. Mr. Haglund not only fails to show this is public in nature, he also fails to show whether it has even recurred even once. He offers zero support for his sweeping conclusion that the "practicing bar and the public" would benefit from such review. *See* Petition at 7.

He merely seeks de novo review of an unpublished Court of Appeals opinion that he does not like.

Accordingly, this Court should deny discretionary review because Mr. Haglund fails to satisfy RAP 13.4(b)(4).

3. Mr. Haglund failed to prove, as he must, that Mr. Gribben's conduct regarding the charging order harmed him.

Mr. Haglund's remaining allegation on appeal is that he suffered harm as a result of Mr. Gribben's late filing of the supersedes bond. However, Mr. Haglund never presented proof to the trial court that the charging orders or Mr. Gribben's handling of them caused any harm at all. Based on this complete failure of proof of harm, the Court of Appeals correctly held that Mr. Gribben's late filing of the supersedeas bond was not the proximate cause of damages to Mr. Haglund where: (1) Mr. Haglund showed no evidence of damages as a result of the charging orders, and (2) Mr. Haglund lost no opportunity to improve his damages on appeal.

Regardless of whether Mr. Gribben met the standard of care in this matter — he did — Mr. Haglund's own misconduct sealed his fate in the Underlying Action and the mere presence of charging orders does not mean that harmed occurred.

4. The charging order liens were never enforced against Mr. Haglund's LLCs.

Immediately after the charging order was filed, Mr. Gribben filed the supersedeas bond and exchanged emails with counsel for Pacific 5000 to confirm that no further collection efforts would be taken. CP 214. Ultimately, approximately seven months later, the charging orders were vacated upon stipulation of the parties. CP 320-323. As Mr. Gribben and Pacific 5000's counsel had agreed previously, no collection activity occurred while the charging orders were in effect. CP 214. Even if enforcement of the charging orders possibly could cause harm to Mr. Haglund, this mere possibility never came to pass. Nor was that mere possibility enough to prove that Mr. Haglund in fact suffered harm. He did not.

While Mr. Haglund pointed to information regarding the properties held under the relevant LLCs in his declaration, there is no evidence of activities that would have been adversely affected by the presence of the charging orders. CP 1019-29. Mr. Haglund admits that there were no collection efforts made, and he failed to show proof of any offers or plans to sell the listed properties with which the charging order actually interfered. CP 535, CP 1019-29.

Additionally, there is no evidence that removal of the charging orders was a priority because Ms. Bloomfield showed no urgency in removing the July 11, 2018 charging orders. Mr. Gribben was removed as counsel approximately one month after the charging orders were filed, with Ms. Bloomfield substituting as counsel for Mr. Haglund in the Underlying Matter. Despite this, it was not until February 14, 2018, more than six months after beginning her representation of Mr. Haglund, that Ms. Bloomfield made any attempt to vacate the charging order. CP 320-323. This failure to take action to

remove the charging order for over seven months provides further support that Mr. Haglund did not experience harm as a result of the mere existence of the charging orders.

Mr. Gribben's expert Keith Petrak found no evidence that the existence of the charging orders caused harm to Mr. Haglund. CP 1065-80. Mr. Haglund's unproven allegation of harm was that he was unable to use an LLC to acquire an additional property. Based on Mr. Petrak's expertise, he questioned the validity of Mr. Haglund's undocumented claim because the charging order should only prevent the transfer of funds from the LLC to Mr. Haglund, not the transfer of additional assets into the LLC. CP 1073-74. Ultimately, Mr. Petrak found that "no transactions on the properties were currently in process nor reasonably contemplated." CP 1072. Therefore, no actual harm was caused by the presence of the charging orders. CP 1065-80.

The Court of Appeals, even assuming that there may have been deals that had been negotiated, still held that Mr.

Haglund had failed to show evidence of harm. A-15. The only evidence before the Court of Appeals showed that Mr. Haglund ultimately got the charging orders dismissed. A-15. There was no proof of any agreed upon transactions that had failed due to the charging order, or any proof of financial damages as a result of any delay that may have been caused by the charging orders. To the extent the charging order represented a potential harm to Mr. Haglund, this was resolved without any damages to Mr. Haglund. A-15. Therefore, Mr. Haglund "has not offered evidence of any financial losses caused by the charging order applies to those sales or his other LLC interests." A-15.

Because Mr. Haglund provided no proof of financial or other losses caused by the charging orders, the Court of Appeals correctly rejected any argument that the mere presence of the charging orders, without more, resulted in any harm to Mr. Haglund.

5. Mr. Haglund failed to show that he would have improved his position on appeal of the Underlying Action.

Without proof of financial loss, Mr. Haglund may only prove harm if he would have done better on appeal but for Mr. Gribben's alleged negligence.

Here, even if Mr. Haglund had been able to present his entire proposed defense, and each of the key witnesses and evidence had been admitted in the Underlying Action, there is no proof that Mr. Haglund would have fared better on the trespass claim. In his deposition Mr. Haglund, admitted that he entered the Pacific 5000 building without permission, prior to purchasing the note on the property and while knowing that he lacked the authorization to enter the premises. CR 408-17. He could not state what specific testimony of the excluded witnesses would have defeated the trespass claim; he offered only the conclusory speculation that "the totality of all the witnesses" would have caused a different result. CP 536-43.

In the motion for reconsideration in the Underlying

Action, Judge Nelson denied Mr. Haglund's motion, finding that "if the evidence contained in Mr. Haglund's declaration were admitted, it would not alter the court's findings of fact and conclusions of law." CP 286.

Significantly, Mr. Haglund's Petition for Review identifies no proof that, even if Mr. Haglund had defeated the trespass claim, he would have fared better in the Underlying Action. Mr. Haglund would have this Court ignore that he was also found liable for a litany of other wrongs, not just for trespass. The trial court in the Underlying Action held that Mr. Haglund was liable under theories of (1) trespass, (2) fraud, (3) breach of contract, (4) violations of the Consumer Protection Act, (5) slander of title, (6) tortious interference with business relationships, (7) civil conspiracy, and (8) waste by landlord or tenant under RCW 4.24.630. CP 198-200. Because the court held Mr. Haglund liable under seven causes of action against Mr. Haglund other than trespass, he failed to prove that he would have fared better in the Underlying Action. The record

on review shows that he still would have been held liable to Pacific 5000 for the same amount of damages due to Pacific 5000's loss of equity in the building.

Perhaps the most important of the causes of action Mr. Haglund lost in the Underlying Action was the conspiracy in restraint of trade under RCW 19.86.090. Pacific 5000 was awarded damages in the amount of $313,447.21, which was trebled under two separate theories of recovery, both intentional trespass under RCW 4.24.630 and conspiracy in restraint of trade under RCW 19.86.090. CP 198-200. Therefore, even if Mr. Haglund had defeated the trespass claim, he would have still been liable to Pacific 5000 under the remaining seven claims, and those damages would have been trebled under the conspiracy charge. A-16, 17.

Neither Mr. Haglund nor his expert, Stephanie Bloomfield presented any testimony that any of the excluded evidence would have rebutted any claims other than trespass. A-11, A-16, 17. In fact, Ms. Bloomfield's declaration does not

speak to causation at all. A-11. Ms. Bloomfield's statements address only her contention that Mr. Gribben fell below the standard of care. A-11. Whether Mr. Gribben complied with the standard of care was sharply controverted, CP 1050-52, and was irrelevant to the basis of the dismissal of this action, which was failure to prove causation. The trial court in the Underlying Action granted Mr. Gribben's motion for summary judgment because Mr. Haglund could not prove that he would have obtained a more favorable result but for Mr. Gribben's conduct.

The Court of Appeals reviewed and unanimously affirmed the trial court's decision. *See generally* Appendix. The Court of Appeals held that, even if Mr. Haglund had defeated the trespass claim, he had failed to provide any evidence that would have reversed the conspiracy claim, resulting in the same result in the Underlying Action:

> Even if judgment on the trespass claim was vacated, the court still would have found that Haglund caused Pacific 5000's loss of equity in the

> building and that the loss should be trebled under RCW 19.86.090 based on Haglund's conspiracies in restraint of trade.
>
> Haglund failed to demonstrate he would have materially bettered his position on appeal but for Gribben's alleged malpractice during or after trial. For this reason, he has not established that he was damaged by loss of opportunity on appeal.

A-16-17.

Because Mr. Haglund offered no proof of actual damages resulting from the charging order, and because he lost no opportunity to improve his position on appeal, Mr. Haglund was not harmed by the charging orders, and therefore not harmed by Mr. Gribben's late filing of the supersedeas bond.

C. Other than 3320 MLK, LLC, Mr. Gribben had no attorney-client relationship with any of the named LLCs.

In cases of legal malpractice brought by non-clients, they must prove that they were intended third-party beneficiaries under a six-part balancing test. *Trask v. Butler*, 123 Wn.2d 835, 843, 872 P.2d 1080 (1994). "[T]he threshold question is whether the plaintiff is an intended beneficiary of the

transaction to which the advice is pertained." *Id.* If such intent does not exist, then no further inquiry into the matter needs to be made. *Id.* If the benefits from the transaction do not flow directly from the attorney-client relationship and are "merely incidental, indirect or inconsequential," then that third party is not a third-party beneficiary. *McDonald Const. Co. v. Murray*, 5 Wn. App. 68, 70, 485 P.2d 626 (1971).

Mr. Haglund has failed to show that a legal duty existed between Mr. Gribben and any of the plaintiff LLCs other than 3320 MLK, LLC. Without a duty to those LLCs that were not parties to the Underlying Action, there can be no compensable damages.

Throughout Mr. Gribben's representation in the Underlying Action, the only representation discussed was of Mr. Haglund and 3320 MLK, LLC. There were no discussions or agreements during Mr. Gribben's representation in the Underlying Action, that would have created an attorney-client

relationship between Mr. Gribben and all of Mr. Haglund's other LLCs. CR 544-549; A-13 fn. 7.

While Mr. Gribben was generally aware that Mr. Haglund had an interest in other projects, there was no discussions regarding any other LLCs beyond 3320 MLK, LLC. Indeed, he did not even know the names of those numerous other LLCs. CP 1097. Mr. Haglund admitted as much, confirming that Mr. Gribben had never told Mr. Haglund that he represented any of the LLCs not named as defendants in the Underlying Action. CP 547-49.

Mr. Gribben intended only to represent 3320 MLK, LLC and Mr. Haglund. The other LLCs have no basis on which to sue, because no legal duty was owed.

D. Disgorgement is improper without "egregious" or "fraudulent" conduct which constitutes "gross misconduct"; Mr. Haglund does not allege or prove any such misconduct here.

Under Washington law, to prevail on a claim for disgorgement of attorneys' fees, Mr. Haglund must prove that Mr. Gribben breached his fiduciary duty in a manner that was

"egregious" or "fraudulent" or constituted "gross misconduct." *Kelly v. Foster*, 62 Wn. App. 150, 157, 813 P.2d 598 (1991).

Any factual or legal basis for the discretionary award of disgorgement of attorneys' fees is absent here. In determining whether an award of disgorgement of fees is merited, the gravity of the attorney's misconduct should be considered. *Id.* at 156. In *Kelly*, the sole beneficiary of her uncle's estate brought an action for breach of fiduciary duty against attorney Foster, who represented the estate's executor. *Id.* at 599. Foster recommended the estate sell its land to a third-party below market value and failed to disclose that he had an interest in the land sale. After the sale, the third party sold part of the land to Foster and his wife. *Id.* The jury found that Foster had breached his fiduciary to Kelly and awarded damages of $85,000. *Id.* at 600. The trial court denied Kelly's motion for disgorgement of fees. *Id.* The Court of Appeals affirmed, holding that "the trial court did not find factors present in this

case justifying reimbursement to Kelly of attorney's fees paid by the estate." *Id*. at 602.

Here, Mr. Haglund points only to Mr. Gribben's late disclosure of witnesses and supposed breach of the duty of candor as to the filing of the supersedeas bond. Neither of these rises to the level of an "egregious" mistake that would justify disgorgement.

In fact, there is no holding that Mr. Gribben has breached his fiduciary duty at all. Instead, every court that has addressed the exclusion of the evidence, or the late filing of the supersedeas bond, has found that Mr. Gribben's alleged negligence has not harmed Mr. Haglund and would have made no difference to the current outcome.

Actions that fail to cause harm to the client certainly do not breach the fiduciary duty in a manner that was "egregious" or "fraudulent" or constituted "gross misconduct." *Kelly*, 62 Wn. App. at 157. The Court of Appeals reaffirmed this conclusion, holding that "[t]he facts do not allege or support a

finding of fraudulent acts or gross misconduct in violation of a statute or against public policy." A-20.

Mr. Gribben's conduct is innocuous compared to the attorney misconduct in *Kelly*, and even in *Kelly*, disgorgement was denied. Therefore, no colorable basis for disgorgement is present here.

VI. CONCLUSION

Supreme Court review of a Court of Appeals decision is an extraordinary step which requires a "compelling need" for this Court to decide an issue presented. The Court of Appeals' unpublished decision in this action does not come close to meeting that rigorous standard.

Therefore, the Court should deny Mr. Haglund's Petition for Review because it fails to meet any of the criteria for review under RAP 13.4(b).

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Respectfully submitted this 13th day of September, 2021.

I certify that this memorandum contains 4,165 words, in compliance with RAP 18.17.

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I, the undersigned, certify under penalty of perjury and the laws of the State of Washington that on September 13, 2021, I caused the foregoing document to be served on the following via e-mail and U.S. mail:

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