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**NO. 100529-6**

IN THE SUPREME COURT OF THE STATE OF WASHINGTON

**Court of Appeals, Div. III -- No. 372642  
Lincoln County Sup. Ct. No. 14-3-01151-7**

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AN NGOC NGUYEN,

Petitioner,

v.

THAO THI THU NGUYEN,

Respondent

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**RESPONDENT'S ANSWER TO PETITION FOR REVIEW**

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## TABLE OF CONTENTS

	<u>Page</u>
I. IDENTITY OF RESPONDENT .....	1
II. COURT OF APPEALS DECISION .....	1
III. ISSUES PRESENTED BY PETITION AND RESPONSES .....	1
1. WHETHER DIVISION THREE’S REVIEW DEPRIVED PETITIONER OF HIS PROPERTY WITHOUT DUE PROCESS OF LAW UNDER THE FOURTEENTH AMENDMENT? .....	1
2. WHETHER DIVISION THREE’S REVIEW OF THE CASE CONSTITUTED AN ABUSE OF DISCRETION? .....	1
3. WHETHER THE PETITION IDENTIFIES ANY VALID GROUND FOR SUPREME COURT REVIEW UNDER RAP 13.4? .....	1
4. WHETHER DIVISION THREE’S FAILURE TO ADOPT RESPONDENT’S “UNDISTRIBUTED PROPERTY/PARTITION” ARGUMENT CONSTITUTES EITHER AN ABUSE OF DISCRETION BY DIVISION THREE OR A DEPRIVATION OF DUE PROCESS OF LAW WITH REGARD TO PETITIONER?.....	1
IV. RESPONDENT’S STATEMENT OF THE CASE .....	2
V. ARGUMENT .....	3
1. THERE IS NO BASIS FOR REVIEW UNDER RAP 13.4 .....	3
i. Alleged misstatements of the record do not constitute violations of due process of law. ....	6
ii. The alleged failure to directly address assignments of error or related arguments does not amount to a violation of due process; in either case the central argument of the appeal was addressed.....	8
iii. Division Three did not violate conventional appellate principles resulting in due process violations. ....	11
iv. There is no reference to an oral agreement was secondary and passing; it was not a finding of fact, though supported by the record..	12
v. Division Three properly reviewed the CR 60 issues of misrepresentation and misconduct.....	13
2. THE REQUEST FOR APPELLATE ATTORNEY FEES SHOULD BE REJECTED; THE COURT SHOULD CONSIDER AWARDING THEM TO RESPONDENT. ....	15
i. No basis for review under RAP 13.4.....	15
ii. No basis for attorney fees under RAP 18.1 .....	15
iii. Ms. Nguyen is entitled to attorney fees according to Washington law below and on appeal .....	17

VI. CONCLUSION..... 18

## TABLE OF AUTHORITIES

	<b><u>Page</u></b>
<u>Cases</u>	
<i>Marriage of Booth</i> , 114 Wn.2d 772 (1990).....	7
<u>Statutes</u>	
RCW 26.09.140.....	17
<u>Rules</u>	
CR 60.....	6, 9, 14
ER 408.....	15
RAP 13.4(b)(4).....	5
RAP 13.4.....	passim
RAP 13.4(b)(1).....	3
RAP 13.4(b)(3).....	3
RAP 18.1(j).....	17
RAP 2.5.....	7

## **I. IDENTITY OF RESPONDENT**

The Respondent, Thao Thi Thu Nguyen, is the ex-wife of Petitioner.

## **II. COURT OF APPEALS DECISION**

The Division Three opinion speaks for itself, and will not be further described here, except that further description of the content of the Motion for Reconsideration is presented below.

## **III. ISSUES PRESENTED BY PETITION AND RESPONSES**

1. Whether Division Three's review deprived Petitioner of his property without due process of law under the Fourteenth Amendment?

A: No. Division Three's review of the appeal was a conventional appellate review, fully and adequately addressing the central issue in the matter, whether the trial court had abused discretion in reopening the matter by way of CR 60.

2. Whether Division Three's review of the case constituted an abuse of discretion?

A: No. The abuse of discretion standard argued by Petitioner applies to the trial court, not to the Court of Appeals.

3. Whether the Petition identifies any valid ground for Supreme Court review under RAP 13.4?

A: No. Division Three *followed* the law in this area, contrary to the contrived due process allegations presented in the Petition. There is no basis for this Court to conduct any constitutional review.

4. Whether Division Three's failure to adopt Respondent's "undistributed property/partition" argument constitutes either an

abuse of discretion by Division Three or a deprivation of due process of law with regard to Petitioner?

A: No. Division Three *did* address this argument, indicating that it was not raised in the trial court. Nonetheless, as the motion for relief from judgment was raised by Respondent in the trial court under CR 60, Division Three's review of the evidence under that rule appropriately addressed the fundamental nature of the appeal.

#### **IV. RESPONDENT'S STATEMENT OF THE CASE**

Respondent will rest upon the statement of facts set forth in the Division Three opinion. As indicated above, it speaks for itself. Left out of the Petitioner's Statement of the Case, however, is any detail concerning the content of the motion for reconsideration (MFR) filed with Division Three. It in fact incorporated virtually all of the arguments now being made before this court, in terms of its review being fundamentally deficient for failing to sufficiently or adequately address the issues raised by the appeal.

The Opinion failed to meaningfully address Appellant's legal arguments. The Opinion ignored or dismissed all of Appellant's legal arguments without meaningful consideration and subsequently resolved the issues in a manner contrary to Washington law. The result is an abuse of discretion and violated Appellant's right to due process.

*MFR*, 1. Those arguments were summarily rejected by Division Three.<sup>1</sup>

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<sup>1</sup> The ruling denying the MFR is appended to the Petition, following the decision.

## V. ARGUMENT

### 1. There is no basis for review under RAP 13.4

The petition ultimately seeks review only under under RAP 13.4(b)(3), a supposed “significant Constitutional question.” *Pet.*, 9-11, 24-25. This claim is supported by four subsidiary arguments which make passing references to RAP 13.4(b)(1) and (2) -- there has been a fundamental denial of due process because Division Three deprived Petitioner of “meaningful review.” *Pet.* 9-11, 24-25. There was no meaningful review because of “pervasive conflicts with numerous decisions of this [Supreme] Court and with decisions of the Court of Appeals” including “well-settled Washington law regarding appellate review.” *Id.* at 9, 15. <sup>2</sup>

The gist of the Petition, therefore, is that Division Three cheated Petitioner, that its decision was deficient and did not appreciably and fairly and objectively consider the merits of his arguments. Thus, the Division Three appellate process was fundamentally unfair. The central argument for acceptance of review is therefore whether this Court would like to review the novel question of whether a depraved Division Three appellate process,

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<sup>2</sup> This analysis is confirmed by studying the numbering of the arguments in the brief. The first is a parenthetical “(1)”; the second and remaining arguments are digitized using period marks for punctuation (e.g. “1.,” “2.”), immediately followed by the conclusion, which repeats the primary argument under the parenthetical (1).”

allegedly against Petitioner, can in this case rise to the level of a deprivation of due process of law.

Respondent asserts that the Petition should be denied on its face here, without regard to any secondary arguments. There is no legal premise for the central claim of some sort of appellate deprivation of due process, or abuse of discretion. Petitioner is making this up. It is an absurd proposition, particularly in the context of this case, for several reasons.

First, there is no express authority introduced in the petition supporting this principle, from this state or from any other jurisdiction. Certainly general principles of due process of law (e.g. *Mathews v. Eldridge*) are cited. But no case or other authority is presented in which an appellate court was found to be engaged in the violations of due process of law when issuing an opinion in due course of a conventional and regular appeal. That is precisely what happened here.

Second, sifting through the various arguments that follow, it is clear that the centerpiece of the claimed unconstitutionality is *not* that Division Three did not provide appropriate, conventional, review of the appeal; it is that Division Three sided against Petitioner, and affirmed the trial court in that regard. Thus it may here be argued that this petition is nothing more than a taste of sour grapes by Petitioner. Petitioner is upset at losing after he appealed. There is no allegation, for example, that Division Three did not

allow him to appeal, nor restrict his ability to present his appeal, nor indication that somewhere along the line there was some impropriety in evaluating his appeal. The closest that he comes to that is the “partition/undistributed property” argument. But that issue *was* addressed, in context, by Division Three. And in fact, the opinion is nothing unusual or extraordinary in the world of appeals. Petitioner alleged there was insufficient evidence in the record to sustain the trial court’s decision to reopen the divorce proceeding, which argument is repeated in the Petition here. Division Three reviewed the record and disagreed with that argument. Along the way it *expressly and directly addressed* the “partition/undistributed property” argument, as discussed above. That logic happens to correspond with what was presented by Respondent in its briefing to Division Three.

As much as Petitioner does not like it,<sup>3</sup> the fact that Petitioner lost in Division Three does not translate to some abstract denial of due process, particularly one which requires review by this Court. He was afforded due process through the Division Three appellate process. There is no basis for review under RAP 13.4(b)(4).

Following that broad assertion, there is a litany of secondary items that Petitioner asserts Division Three resolved incorrectly which creates the

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<sup>3</sup> And is being recalcitrant about it, ultimately, as discussed below.

“significant question” of constitutional law. These might be thought of as the building blocks of that general claim for review here. Though unnecessary because of the above analysis, to the extent they are identified more specifically in the Petition, some further response is provided here.

**i. Alleged misstatements of the record do not constitute violations of due process of law.**

Petitioner alleges that certain misstatements of the record by Division Three constitute a violation of due process to him, in whole or in part; he ultimately states in this section, as in others, “[t]he *Opinion’s* numerous misstatements of the record confirm that it [Division Three] did not provide An Ngoc with meaningful review.”

His first example is that Division Three may have incorrectly identified the time gap between the decree and the proceedings as three rather than four years. *Pet.* 12. But Petitioner never explains how or why this distinction makes any difference to anything, especially to the issue of whether this court should accept review. Indeed under operative provisions of CR 60, a motion only needed to be brought within a reasonable period of time. *Resp. Br.*, 20-24; *Opinion*, 6.

Next the Petition asserts that the Opinion “misstates the record” when it determined that the motion was timely when “the trial court never

determined that her motion was timely.” This is form over substance. The trial court granted the CR 60 motion; it therefore necessarily ruled that the motion was timely. Moreover, Division Three specified *why* there was no trial court abuse of discretion on this point, as Respondent brought the motion shortly after learning of the illicit transfer by Petitioner. Furthermore, as pointed out in the Respondent’s briefing, an absolute maxim of appellate review is that in the absence of findings, an appellate court may look at a trial court’s opinion to determine the basis for the trial court’s resolution of an issue. *Marriage of Booth*, 114 Wn.2d 772 (1990); RAP 2.5.

The same response applies to Petitioner’s third argument in this section of briefing, that Division Three “misstated the record” when it ruled there was a factual basis for fraud, misrepresentation or misconduct. Again, Petitioner alleges there were no findings or conclusions by the trial court on this point, and that it “ruled solely on undistributed property.” Even if this were so, Division Three was entitled to look at the entire record to understand the trial court actions. Also, as pointed out otherwise in this briefing and that made to Division Three, the partition argument would allow Petitioner to capitalize on his illicit/dubious transfer of the Lacey property. For example, in partition, as co-tenants, each would presumably be entitled to an even split of the property, without regard to any other marital/dissolution assets. If the property had been *included* in the original dissolution proceedings, it would

have been incorporated with all the marital assets in fashioning a fair split. This is what the trial court did, and the procedure approved by Division Three.

Also, as pointed out in Division Three, Petitioner's argument in the trial court was that the transfer of the Lacey property was valid and legally enforceable. In such case, there was to be no partition. To come into Division Three and advance such a proposition was to compound the illicit and illegal transfer, albeit in the dissolution proceedings. Put another way, it was a marital asset at the time of the dissolution which should have been part of the dissolution when it was originally considered by the court; the reason it was not then included was because of 1) the supposed side agreement between the parties combined with 2) the illicit transfer by Petitioner.

There are other variations of these responses which can be presented. The core issue, however, as presented by the Petition, is that these items of "misstatements of the record" prevented "meaningful review, that is, a deprivation of due process against Petitioner. This argument does not support review by this Court.

- ii. The alleged failure to directly address assignments of error or related arguments does not amount to a violation of due process; in either case the central argument of the appeal was addressed.**

The next section of briefing again asserts a denial of due process and/or meaningful review by Division Three in that it was required to more precisely address Petitioner's "wrong legal standard" argument. The wrong legal standard was the "existence of undistributed property ***NOT*** the bases outlined in CR 60". The section of argument for review should be rejected for several reasons.

First, again, Petitioner does not articulate how this alleged error amounts to a justification for review under RAP 13.4 other than the general references to some oblique fundamental fairness.

Second, it refuses to acknowledge that Division Three did review the matter to determine whether the trial court had engaged in an abuse of discretion under traditional legal principles, specifically those principles of CR 60 which applied, based on the specific arguments for reversal brought by Petitioner as Appellant, as elegantly recounted by the Petition. It seems a bit odd that Petitioner would seek review under CR 60, lose under CR 60, and then complain that Division Three did not rule for him under CR 60.

Third, the argument continues to conflate the standards of undistributed property with those of CR 60, and argues without basis that the two could never conceivably overlap, which they happen to here. In other words, though there perhaps was technically "undistributed property" at issue

because of the CR 60 ruling, the CR 60 ruling in-effect creating that condition is not invalid. The two simply are not mutually exclusive.

Fourth, Division Three refused to more deeply review the argument because it had not been sufficiently preserved at the trial court level. Indeed, at the trial court Petitioner asserted – as he continues to here – that there was no agreement such as that to which his ex-wife testified. He testified that his wife *agreed* that he would have both properties. Therefore, at trial Petitioner largely refused to acknowledge the possibility of partition; he asserted that his full ownership of the Lacey property was a done deal. Under the circumstances, the reference to undistributed property and partition is illogical. The trial court abjectly rejected his side of the story.

Fifth, and for much the same reason, the trial court treated the Lacey lot as property that was illicitly transferred and should have been treated as part of the dissolution proceedings when the dissolution occurred. That is, but for the illicit transfer by Petitioner, it would have been so treated. The critical question is not whether it was undistributed property, but how it came to be so.

Beyond simply alleging a grandiose denial of “meaningful review,” this segment of briefing makes no reference back to RAP 13.4. Especially given the observations set forth above, there is no basis for Supreme Court review based on these factors.

**iii. Division Three did not violate conventional appellate principles resulting in due process violations.**

The next variation of the due process argument involves sub-arguments 3 and 4 in the briefing. Here Petitioner asserts Division Three wrongly evaluated credibility, weighed evidence, and substituted its judgment for that of the superior court. *Pet.*, 16. This argument suffers from many of the same defects as those explained above.

First, it does not tie the matter into RAP 13.4, other than in the general sense of general unfairness and due process deprivation, as set forth above.

Second, there were no findings of fact or decisions of credibility made by Division Three. It made rulings of law, specifically whether the trial court should or should not be affirmed as a matter of law. The trial court determined that there was undistributed property *because* Petitioner's dubious deed was invalidated; a court order to that effect was issued. It was invalidated because the trial court believed there was ample evidence to show that the parties did not have a meeting of the minds, at minimum, because Respondent never intended to convey her interest in the Lacey property. There was no meeting of the minds because Petitioner, on his own, added pages to the document to falsely incorporate the Lacey property in the deed presented for the Tacoma property. The trial court necessarily made some assessment of the competing testimony on this point and believed Respondent more creditable, that is, that

the pages containing the legal description for the Lacey property were added after Respondent signed the document. Petitioner vehemently denied the same. Division Three found there was sufficient evidence in the record to support the trial court decision in this regard, such that there was no abuse of discretion. This is review on a matter of law; it is not a finding as alleged by Petitioner. On this basis, there is no reason for Supreme Court review.

**iv. The reference to an oral agreement was secondary and passing; it was not a finding of fact, though supported by the record.**

The next arrow in the Petition's quiver is the notion that due process was not provided by Division Three because it determined – as a finding of fact – that there was an oral promise by Petitioner. The Petition goes on to say that any recognition of such a promise amounted to an error as a matter of law. *Pet.*, 17-18. The error of law occurred because it is said to be in violation the statute of limitations and the statute of frauds. This argument should be rejected for several reasons.

The first is that this description of the opinion by Division Three is inaccurate, in its final form. In particular, as set forth above, there was a motion for reconsideration filed by Petitioner in Division Three. That motion presented the same argument presented here on this precise point. The ruling

on reconsideration, while summary, specifically addressed this complaint. It amended the opinion and the sentence at issue, as follows:

IT IS FURTHER ORDERED that the third full sentence in the third paragraph on page 6 that begins “Further, it is uncontested” shall be deleted and the following shall be inserted in its place:

The trial court considered Ms. Nguyen’s declaration, which stated that she did not know the March 2014 deed purported to convey her interest in the Lacey property.

This revision makes clear that Division One was acting as an appellate court, examining the record to determine whether evidence existed before the trial court to support its ruling so that there would be no abuse of discretion.

Second, as with all the other arguments, there is no argument as to precisely how this part of the case justifies some form of review under RAP 13.4. In fact, especially with the ruling on the motion for reconsideration, Respondent has again received review of his case. There is no issue of some anomalous deprivation of due process by Division Three which would support review by this Court.

**v. Division Three properly reviewed the CR 60 issues of misrepresentation and misconduct**

The Petition maintains that review should be accepted because Division Three erred as a matter of law concerning its review of the CR 60 issues related to misrepresentation or misconduct. In particular, as with the

Division Three appeal, Petitioner basically asserts the record in the trial court did not contain sufficient evidence for vacation of the judgment under CR 60. The Petition maintains 1) that the mere fact that a document contains errors is not sufficient evidence to prove either misrepresentation or misconduct, as such evidence can have “many potential interpretations;” 2) that any claims of oral agreements must survive the statute of frauds/limitations; and 3) that Division Three was off base when it surmised that Respondent would not have signed off on the divorce decree had she known. The Petition concludes that Division Three “abused its discretion” in ruling against Petitioner. None of these items justifies Supreme Court review, for several reasons.

First, no review is justified under any constitutional standard, the main claim of the petition. The primary grievance here is that Petitioner disagrees with Division One’s decision concluding there was sufficient evidence to justify reopening the matter under CR 60.

Second, no review is justified under any other provisions of RAP 13.4. The Petition here simply alleges that Division Three “erred” as a matter of law. Nonetheless, the error of law relates back to the factors it identified in making its decision. Once again, as argued above, Petitioner refuses to acknowledge that the illicit transfer of the Lacey property contributed to the false representation in the original decree that the parties had reached an agreement as to disposition of their marital real estate. The truth was that they

had not. Thus there was without any doubt a connection to the judgment. All of this was addressed in Respondent's briefing to Division Three. Division Three agreed with those arguments there. <sup>4</sup>

Third, as suggested above, Respondent is not aware of any "abuse of discretion" standard for review this Court to review Division Three, as put forth in Respondent's final paragraph of argument on these points on page 22 of the briefing. There is no case cited for this extremely broad proposition. Again, it should not serve as any basis for Supreme Court review.

2. The request for appellate attorney fees should be rejected; the Court should consider awarding them to Respondent.

**i. No basis for review under RAP 13.4.**

Although somewhat unclear from the manner in which it is presented, the Petition can be interpreted as seeking review based on Division Three's ruling that no attorney fees would be allowed to either party on appeal. To the extent it may be, such idea should be rejected. There is no argument presented under RAP 13.4.

**ii. No basis for attorney fees under RAP 18.1**

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<sup>4</sup> Here again Petitioner weaves in the specious statute of limitations and statute of frauds arguments addressed above, which are byproducts of the "oral promise" argument. He additionally posits another vague ER 408 theory. Respondent is unable to connect those thoughts and ideas to the central question here, that of review factors under RAP 13.4.

The other option here is that an award of appellate attorney fees is being submitted pursuant to RAP 18.1(b), to preserve the issue. Indeed the argument presented seems to be aimed more at this provision, as Petitioner ultimately argues for attorney fees “on appeal for having to defend against Thao’s frivolous motions four years after entry of the decree.”

There are a number of problems with this request. Most glaringly, of course, is the suggestion of this litigation being frivolous when the trial court and Division Three are in accord as to the proper result, that being *against* Petitioner. It is by such circumstances not frivolous.

Moreover, as Respondent pointed out in her briefing below, and despite the somewhat diplomatic ruling by the trial court, there is considerable evidence here that Petitioner was actively involved in a scheme to deprive Respondent of a fair distribution of the marital assets. This assertion was argued to Division Three by Respondent and Division Three basically agreed.

Viewed through this lens, as argued below, and now amplified by the 1) the probable and likely manipulation of the deed at issue, 2) the trial court ruling, 3) the refusal of Petitioner to convey the Lacey property to date back to Respondent, 4) the appeal to Division Three and subsequent ruling against Petitioner, 5) the denial of the motion for reconsideration to Division Three that was denied and 6) the current off-base Petition before this court, the argument that Respondent has been recalcitrant is wholly off base, frivolous

and itself recalcitrant. Put more simply, Petitioner is the recalcitrant one, who simply refuses to take no for an answer, and has forced Respondent to pay extensive legal costs through protracted litigation.

**iii. Ms. Nguyen is entitled to attorney fees according to Washington law below and on appeal**

All of what is written above supports this Court's consideration of some award of attorney fees against Petitioner, using the same standard cited by Petitioner. In making such argument Respondent concedes the application of RAP 18.1(j), and specifically that Division Three ruled neither party should be awarded appellate attorney fees. Nonetheless, this Court no doubt has authority under either RCW 26.09.140 and/or the principles of intransigence. With regard to this, Respondent would ask this Court to critically assess the Petition. As presented above, it gives passing, token mention to RAP 13.4, and instead ultimately argues that Division Three was somehow biased against Petitioner, that Petitioner was generally and ambiguously denied due process and/or "meaningful review." No specific case law is cited to support this grandiose argument. It can be paraphrased as something akin to "everybody is against me," including specifically the judges of Division Three. This is perhaps the embodiment of recalcitrance, now that a series of judicial officers have sternly ruled against Petitioner. Yet he has continued to litigate.

## VI. CONCLUSION

The Petition should be denied. Its central premise, a fundamental deprivation of due process caused by the Court of Appeals, is not supported in law, nor in the facts and circumstances of review. Division Three fairly reviewed the matter and properly analyzed the legal issues presented by Petitioner. Its decision is firmly based in conventional legal principles and appellate law. It did not go out of bounds in any way that prevented effective, neutral and detached review of the matter, despite the fact that Petitioner lost.

Petitioner is not entitled to any review of the issue of attorney fees. If such is entertained at all, in any form, further attorney fees should be awarded to Respondent who has been inordinately required to litigate this matter now several years in the making, including this appellate process.

The undersigned certifies that the foregoing brief contains 3957 words not including the appendices, title sheet, table of contents, table of authorities, certificate of service, signature block, and this certificate of compliance.

DATED this 22nd day of February 2022,

By:     /s/ Thomas E. Seguine      
THOMAS E. SEGUINE, WSBA # 17507  
Counsel for Respondent

DECLARATION OF DELIVERY

I, Thomas E. Seguine, declare as follows:

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

Executed at Mount Vernon, Washington this 22<sup>nd</sup> day of February 2022,

/s/ Thomas E. Seguine  
NAME

February 22, 2022  
DATE

**LAW OFFICE OF TOM SEGUINE**

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