FILED
SUPREME COURT
STATE OF WASHINGTON
8/23/2022 10:03 AM
BY ERIN L. LENNON
CLERK

CASE NO. 101093-1

IN THE SUPREME COURT OF THE STATE OF WASHINGTON

FREEDOM FOUNDATION, Petitioner

v.

WASHINGTON FEDERATION OF STATE EMPLOYEES, et al., Respondents

RESPONDENT CITY OF SEATTLE'S ANSWER TO PETITION FOR REVIEW

ANN DAVISON Seattle City Attorney

JESSICA LEISER, WSBA #49349 Assistant City Attorneys Seattle City Attorney's Office 701 Fifth Avenue, Suite 2050 Seattle, WA 98104 (206) 684-8200

I. INTRODUCTION

The City of Seattle ("the City") is a charter code city and municipal corporation located in Seattle, Washington. On January 15, 2020, the City received a request in its public records office from the Freedom Foundation, seeking information for each employee who is a member of a union-represented bargaining unit, including name, day and month of birth, and information about the employee's bargaining unit.

On January 10, 2020, the City was served with a Summons and Complaint for Injunctive Relief in this matter, in which it was named as one of numerous defendants. The City has been included in this litigation since that date.

II. RESPONSE TO PETITION

The City takes no on the merits of the Freedom

Foundation's Petition for Discretionary Review and has no
objection to review of the underlying matter by this Court.

Additionally, unless the Court directs otherwise, the City does
not intend to participate in oral argument in this matter.

This document contains 157 words, excluding the parts of the document exempted from the word count by RAP 18.17.

DATED this 23rd day of August, 2022.

ANN DAVISON
Seattle City Attorney

By: <u>s/Jessica Leiser</u>

Jessica Leiser, WSBA #49349 Assistant City Attorneys Seattle City Attorney's Office 701 Fifth Avenue, Suite 2050 Seattle, WA 98104 (206) 684-8200

Attorney for Respondent City of Seattle

DECLARATION OF SERVICE

- I, Marisa Johnson, declare and state:
 - 1. I am over the age of eighteen, not a party to this action and am competent to be a witness herein.
 - 2. On the date noted below I caused the foregoing City of Seattle's Answer to Petition for Review to be filed with the Washington State Court of Appeals via the eFiling Application, which will automatically provide notice to such filing to all required parties.

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

DATED this 23rd day of August, 2022, at Seattle, WA.

/s/Marisa Johnson Marisa Johnson, Legal Assistant

SEATTLE CITY ATTORNEY'S OFFICE - GOVERNMENT AFFAIRS

August 23, 2022 - 10:03 AM

Transmittal Information

Filed with Court: Supreme Court

Appellate Court Case Number: 101,093-1

Appellate Court Case Title: WA Federation of State Employees, et al. v. Freedom Foundation

Superior Court Case Number: 19-2-06100-3

The following documents have been uploaded:

1010931_Answer_Reply_20220823100101SC927508_9472.pdf

This File Contains:

Answer/Reply - Reply to Answer to Motion for Discretionary Review

The Original File Name was City of Seattles Answer to Pet for Review FINAL.pdf

A copy of the uploaded files will be sent to:

- ADaylong@floyd-ringer.com
- APearce@floyd-ringer.com
- Alexandra@KenyonDisend.com
- Allen@vanderstoep.com
- Andream@sumnerwa.gov
- EvelynFielding.Lopez@atg.wa.gov
- Jennifer.Loynd@piercecountywa.gov
- Kelder@freedomfoundation.com
- LPDarbitration@atg.wa.gov
- LeighAnn.Tift@seattlehousing.org
- · Lsantangelo@kirklandwa.gov
- Margaret@kenyondisend.com
- Natalie.brown@kingcounty.gov
- aastrakhan@snoqualmiewa.gov
- abrenes@chmelik.com
- acruz@unionattorneysnw.com
- adrian.winder@foster.com
- aeddy@cityoftacoma.org
- ahearne@foster.com
- alex.witenberg@snoco.org
- amuul@floyd-ringer.com
- angela@lighthouselawgroup.com
- angie@ylclaw.com
- antoinette@kenyondisend.com
- appeals@graysharbor.us
- arains@ghpud.org
- barnard@workerlaw.com
- bio.park@mercerisland.gov
- bob.noelaw@gmail.com
- bob@rbouvattepllc.com
- bsterbank@snoqualmiewa.gov
- ccomer@cityoftacoma.org
- · ccowgill@cityofpa.us

- cmiller@craiglmiller.com
- cmpalmer@kitsap.gov
- cpl@pattersonbuchanan.com
- cyndi@pfrwa.com
- darcey.elliott@atg.wa.gov
- david.moon@atg.wa.gov
- dkf@pattersonbuchanan.com
- · dstragier@spokanecity.org
- edy@ylclaw.com
- emilyg@trustedguidancelaw.com
- gamann@cityoffife.org
- grantw@trustedguidancelaw.com
- grubstello@omwlaw.com
- hillary@kenyondisend.com
- hstrasberg@comcast.net
- hstrasberg@me.com
- james.mcnamara@eluho.wa.gov
- james.niemer@soundtransit.org
- jaufderh@kitsap.gov
- jay@pfrwa.com
- jbrown@stevensclay.org
- jcombs@cityoffife.org
- jdefrang@cityofpa.us
- jds@pattersonbuchanan.com
- jeff@haggardganson.com
- jlebeau@prklaw.com
- jmanix61@gmail.com
- jmolay@cityofpa.us
- jmyers@lldkb.com
- joe.brogan@foster.com
- joel@ascentllp.com
- john.gerberding@kingcounty.gov
- john.safarli@courts.wa.gov
- jriley@wallawallawa.gov
- jwhite@prklaw.com
- katie.yount@chelanpud.org
- kcomeau@auburnwa.gov
- kcpaciv@kitsap.gov
- · kdetwiler@unionattorneysnw.com
- khansen@prklaw.com
- kraymond@kirklandwa.gov
- laura@mcaloon-law.com
- ldunn@bdlaw.com
- legal@richardhugheslaw.com
- lhoober@gth-law.com
- lisa@lldkb.com
- litdocket@foster.com
- malolaw@yahoo.com
- mari.isaacson@kingcounty.gov
- maureen.wingler@ci.longview.wa.us
- mckenna.filler@foster.com
- mdelaba@gcpud.org
- michelle@sayrelaw.com
- nikkit@trustedguidancelaw.com

- njohnston@bdlaw.com
- noe.robert@ysd7.org
- ntillotson@graysharbor.us
- patricia@lighthouselawgroup.com
- paul.byrne@bothellwa.gov
- pcpatvecf@piercecountywa.gov
- rachel@madronalaw.com
- rbinger@spokanecounty.org
- rdavis@chmelik.com
- respegard@gth-law.com
- revolyef@atg.wa.gov
- rick@richardhugheslaw.com
- ron@cogdillnicholsfarley.com
- rroberts@bdlaw.com
- rrysemus@snoco.org
- ryann@millcreeklaw.com
- scpaappeals@spokanecounty.org
- sfaggiano@spokanecity.org
- shawn.horlacher@atg.wa.gov
- shellyt@rmbllaw.com
- sjdivittorio@snopud.com
- sjohnson@cityofhoquiam.com
- sklotz@floyd-ringer.com
- smack@everettsd.org
- sphillips@freedomfoundation.com
- sprosser@craiglmiller.com
- srogers@kitsap.gov
- tharris@360legalsupport.com
- tom@rmbllaw.com
- tparson@ghpud.org
- tsnow@prklaw.com
- valenzuela@workerlaw.com
- wbloor@cityofpa.us
- weinert@ci.ellensburg.wa.us
- zilavy@gmail.com

Comments:

Sender Name: Jay Beck - Email: jay.beck@seattle.gov

Filing on Behalf of: Jessica Lynn Zornes Leiser - Email: Jessica.Leiser@Seattle.gov (Alternate Email: marisa.johnson@seattle.gov)

Address:

701 5th Avenue

Suite 2050

Seattle, WA, 98104-7095 Phone: (206) 684-8200

Note: The Filing Id is 20220823100101SC927508