NO. 101769-3

SUPREME COURT OF THE STATE OF WASHINGTON

TERRY COUSINS,

Petitioner,

v.

DEPARTMENT OF CORRECTIONS,

Respondent.

THE DEPARTMENT'S RESPONSE TO MEMORANDUM OF AMICI CURIAE AMERICAN CIVIL LIBERTIES UNION OF WASHINGTON, COLUMBIA LEGAL SERVICES, AND WASHINGTON COALITION FOR OPEN GOVERNMENT

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I. INTRODUCTION

The Public Records Act's (PRA) one year statute of limitations and its unique procedural process are designed to expeditiously address PRA claims in order to support the ultimate goal of providing access to records. This objective is well served by the interpretation of the statute of limitations that this Court adopted in *Belenski v. Jefferson County*, 186 Wn.2d 452, 378 P.3d 176 (2016).

The Court of Appeals has correctly applied *Belenski*'s clear rule: when a request is closed, the requester has one year to file suit from that point. Absent a timely lawsuit or application of equitable tolling, the requester's remedy to obtain records is to submit a new request. But when a requester fails to file suit within that one year period, the requester's legal claims arising from that request are barred by the statute of limitations. Adopting such a clear and workable rule was the goal of this Court's decision in *Belenski*.

Amici express concerns that this rule creates a disincentive for agencies to conduct adequate searches and encourages litigation instead of cooperation. Neither concern provides a basis for revisiting *Belenski*. The first concern was already considered by this Court in *Belenski*. *Belenski*, 186 Wn.2d at 461-62. Rather than adopting a different interpretation of the statute of limitations based on arguments that agencies would intentionally withhold records, the Court signaled that equitable tolling was the best way to address such concerns. *Id.*

The second concern, that a bright-line rule discourages cooperation and invites litigation, also does not require this Court's review. Rather, this outcome is a natural result of procedural mechanisms that do not require exhaustion of administrative remedies prior to filing suit. And, given the risk of liability for inadequate searches, agencies have little incentive to close a request without a robust search. In this case, the superior court correctly concluded that the Department's "search

was adequate, reasonable, and conducted in a manner to timely produce the requested records." CP 1794.

Similarly, Amici's suggestion that the Department has been "escaping liability" when it cooperates with requesters and provides records after the initiation of a PRA suit also does not support this Court's review. Amici cite to five cases over a nine-year period during which the Department has received tens of thousands of PRA requests. None of those five cases support Amici's claim that the Department "shirks" its obligations prior to litigation. Thus, Amici do not present a basis for discretionary review.

II. ARGUMENT

A. Amici's Policy Arguments Were Addressed by This Court in *Belenski* Itself

The primary purpose of the PRA is to provide access to public records. *Doe ex rel. Roe v. Wash. State Patrol*, 185 Wn.2d 363, 371, 374 P.3d 63 (2016). To further that purpose, the Legislature has designed a process by which dissatisfied requesters can file suit and require the agency to demonstrate

compliance with the PRA. RCW 42.56.550(1), (2). This Court's "cases emphasize the importance of speedy review of PRA claims." *Kilduff v. San Juan Cnty.*, 194 Wn.2d 859, 871, 453 P.3d 719 (2019).

Further emphasizing the need to resolve such disputes expeditiously, the Legislature has adopted a fairly short statute of limitations of one year that applies to PRA claims. RCW 42.56.550(6). This Court in *Belenski*, and the Court of Appeals in a string of decisions starting with *Dotson v. Pierce County*, 13 Wn. App. 2d 455, 464 P.3d 563 (2020), have adopted a clear and workable rule that applies to all types of PRA responses.

This rule is based on the premise that once an agency notifies the requester that her request is closed, the requester can file suit challenging the agency's response. Indeed, all three judges of the Court of Appeals, including the dissenting judge, recognized that Cousins could have filed suit after the Department closed her request in January 2019. *Cousins v. Dep't of Corr.*, 25 Wn. App. 2d 483, 495, 523 P.3d 884 (2023)

("Cousins could have and should have filed suit regarding what she believed to be DOC's deficient production before the statute of limitations expired in January 2020."); *Cousins*, 25 Wn. App. 2d at 500 (Glasgow, J., dissenting in part) ("Even though Cousins could have brought a public records lawsuit within one year of the initial closing letter…"). Given the rule adopted by this Court in *Belenski*, requesters and public agencies have clear guidance about the need to file a lawsuit within one year of the closure of a request.

Although the expiration of this statute of limitations prevents a requester from pursuing judicial remedies related to a given request, it does not impact the requester's ability to obtain records. As the Court of Appeals recognized below "[n]othing prevents a requestor from making a new records request for records that were not produced." *Cousins*, 25 Wn. App. 2d at 495. Given the nature of PRA claims and the limited impact that the statute of limitations has on obtaining records, the Court of

Appeals decision below is unlikely to have any significant impact on a requester's ability to obtain records.

Amici assert that *Dotson* and the decision below create a number of policy concerns. However, examining their arguments closely, Amici's primary disagreement is not with the Court of Appeals case law but with *Belenski* itself. In fact, this Court was faced with many of the same policy concerns when it decided *Belenski* and adopted the clear and workable rule. *Belenski*, 186 Wn.2d at 461-62. Like Amicus Washington Employment Lawyers Association, Amici simply want this Court to revisit its prior decision in *Belenski*. This Court should decline to do so.[1]

[1] Amici also briefly claim that the decision below conflicts with *Rental Housing Association of Puget Sound v. City of Des Moines*, 165 Wn.2d 525, 199 P.3d 393 (2009). However, as *Belenski* explained, the circumstances in *Rental Housing Association* dealt with the triggering of the statute of limitations by a claim of exemption. *Belenski*, 186 Wn.2d at 461 n.2. Like in *Belenski*, this case does not require the Court to determine whether the Department triggered the statute of limitations by claiming an exemption, because neither party has invoked that portion of the statute of limitations.

Amici claim that the decision below discourages agencies from conducting adequate searches. However, the bright-line rule adopted in *Belenski* and properly applied by the Court of Appeals does not have this effect. An agency that conducts an inadequate search with the hopes that it will not be sued is taking an extraordinary gamble. The agency obviously has no way to predict whether or not a requester will file suit within the one year period. And if the agency intentionally fails to produce records or otherwise acts in bad faith, it faces the potential of equitable tolling as well as the most stringent penalties. There is simply no evidence that agencies will take such risks.[2] And to assume as much without any evidence is contrary to this Court's typical approach of assuming that agencies and public officials will comply with the law. *See, e.g., State ex rel. Hodde v. Superior Court of Thurston Cnty.*, 40 Wn.2d 502, 515, 244 P.2d

[2] As discussed below, the superior court concluded that the Department conducted an adequate search, so this concern is not present in this case.

668 (1952) ("It has long been the rule in this state that it is to be presumed that public officials act, or will act, within the limits of their authority and in good faith.").

Amici finally argue that the decision below will promote conflict instead of cooperation. The Department agrees that the PRA works best with communication between agencies and requesters. The Department also agrees that requesters should use the internal appeals process to attempt to resolve their concerns. But this case does not undermine those principles because it involves the interpretation of the statute of limitations, which is inherently a part of the litigation process, not the agency's response process. And this Court has already concluded that requesters cannot be forced to use administrative appeals processes prior to filing suit under the current iteration of the PRA. *Kilduff v. San Juan Cnty.*, 194 Wn.2d 859, 872, 453 P.3d 719 (2019). Moreover, as explained elsewhere, (*See* DOC's Resp. to WELA's Amicus Br., at 8-9), adopting a less definite statute of limitations that hinges on various factors or punishes

agencies for communicating with the requester after closure of the request will undermine rather than serve the goals of cooperation and communication.

Rather than impacting communication, the bright-line rule originally adopted by this Court in *Belenski* creates clear rules for requesters and agencies. It gives agencies and requesters a year to resolve concerns prior to the expiration of the statute of limitations. It also permits equitable tolling when appropriate. And for those requesters who remain dissatisfied with the agency's response to a request, they simply must file their lawsuit within one year, or submit another request at any time.

Finally, although Amici emphasize the importance of communication in arguing for a change in the interpretation of the PRA's statute of limitations, Amicus Washington Coalition for Open Government (WACOG) struck a much different tone when this Court was considering whether a requester could be required to use an administrative process prior to filing suit. Specifically, in its briefing in *Kilduff v. San Juan County*,

WACOG recognized that "[t]he PRA is designed to place the burden of compliance on the agency *and to allow the requester to quickly hale the agency into court if the requestor is unsatisfied with an agency's response."* Br. of Amicus WACOG, at 6, *Kilduff v. San Juan Cnty.*, 194 Wn.2d 859, 872, 453 P.3d 719 (2019) (emphasis added). And WACOG argued that the PRA is not concerned "with allowing an agency to correct its mistakes before being haled into court." *Id.*, at 6. Given the emphasis on resolving PRA issues expeditiously as recognized by this Court and even by WACOG in other cases, there is no need to alter this Court's prior analysis of the PRA's statute of limitations. Therefore, these policy arguments do not present a persuasive basis for granting review.

B. The Court Should Not Rely Upon Amici's Inaccurate and Unsupported Characterization of the Record in This Case

Amici make a number of claims about the facts of this case and the Department's response to Cousins' request that are

contradicted by the record and the superior court's decision and therefore cannot provide a basis for review.

First, Amici's repeated claim that the Department's search was inadequate in this case is belied by the superior court's unchallenged factual findings. Specifically, the superior court found that the Department's "search was adequate, reasonable, and conducted in a manner to timely produce the requested records." CP 1794. Cousins has not challenged that finding on appeal and it is a verity as a result.

Second, Amici argue that applying prior appellate case law to Cousins' claims would permit the Department and other agencies to "manipulate the statute of limitations." Amici's Br., at 6. The Court of Appeals, however, addressed this concern and specifically noted that "there is no indication in the record that DOC's response was an attempt at manipulation." *Cousins*, 25 Wn. App. 2d at 494. Amici do not acknowledge the Court of Appeals' conclusion and make no attempt to argue that the Court was wrong on the record or that the Department was in fact

attempting to manipulate the statute of limitations. And as the Court of Appeals recognized, even when manipulation is present, equitable tolling provides a tool to address such manipulation. *Cousins*, 25 Wn. App. 2d at 494. Cousins has abandoned any argument regarding equitable tolling on appeal.

Third, Amici repeatedly claim that the Department produced 1,000 pages of additional records. Amici's Br., at 6. That is not supported by the record. As the Department has repeatedly pointed out during these proceedings, the "vast majority of these records had already been provided to Cousins" and were provided again to attempt to address her concerns. COA Brief, at 11. Despite suggesting that some of the records were important to her ability to file a tort claim, Cousins has never identified these records. Indeed, although Cousins has not been entirely consistent on this point, a careful read of her complaint in the superior court demonstrates that even she does not believe that 1,000 additional records were produced. CP 6-7 (complaining about duplicative documents in her complaint).

Finally, Amici state that Cousins received additional records eleven months after the request was closed. Amici's Br., at 2. In doing so, Amici suggest that the Department produced records prior to the one year statute of limitations expiring, and the implication appears to be that Cousins might have acted reasonably in declining to file suit at that point. This proposition is not supported by any citation to the record and is demonstrably incorrect.

Prior to the expiration of the statute of limitations, the Department reiterated to Cousins that her request was closed. CP 65 (informing Cousins that her request "is and remains closed"). The Court of Appeals correctly recognized that based on the facts of this case, "Cousins could have and should have filed suit regarding what she believed to be DOC's deficient production before the statute of limitations expired in January 2020." *Cousins*, 25 Wn. App. 2d at 495. Given her apparent dissatisfaction with the Department's response dating back to May 2017, the Court of Appeals concluded that the application

of the statute of limitations to a lawsuit filed in January 2021 cannot be said to lead to a harsh result here. *Id.*[3]

Amici's inaccurate presentation of the record does not provide a basis for this Court's review.

C. Amici's Attacks Against the Department Do Not Provide a Basis for Discretionary Review

After taking issue with the clear and workable rule in *Belenski* and presenting an inaccurate view of the record in this case, Amici attempt another tactic to persuade this Court to take review, i.e., to simply attack the Department as a bad actor. But Amici's arguments are unsupported and, in any event, do not provide a basis for review.

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[3] Amici also make inaccurate assertions about PRA case law. For example, Amici claim that "inadequate agency searches trigger penalties under the PRA." Amici Br., at 7 (*citing Neighborhood All. Of Spokane Cnty. v. Spokane Cnty.*, 172 Wn.2d 702, 717-18, 261 P.3d 119 (2011)). But *Neighborhood Alliance* does not stand for this proposition. Instead, this Court explicitly said "But we again put off for another day the question whether the PRA supports a freestanding daily penalty when an agency conducts an inadequate search but no responsive documents are subsequently produced." *Id.* at 724. At best, Amici's statement misconstrues the decision in question.

As an initial matter, Amici's attempt to paint the Department as a bad actor does not demonstrate that this case meets any of the established criteria for discretionary review. Amici spend almost half of their brief arguing that the Court should take discretionary review based on a purported need to punish the Department. Amici's Br., at 7-12. But the criteria for discretionary review focus on whether the decision below, and its interpretation of the PRA's statute of limitations, comports with precedent or involves an issue of substantial public interest. RAP 13.4(b)(1)-(4). These criteria do not turn on the identity of the parties' involved in the litigation, and they are not met here.

In any event, contrary to Amici's characterization, there is no evidence that the Department fails to take its PRA obligations seriously. Amici's arguments are unsupported. Instead, Amici's argument ignores the superior court's findings in this case; provides a skewed view of the Department's compliance with the PRA with respect to other requests; and relies upon cases that do

not support any plausible view that the Department is somehow escaping liability.

First, Amici's attacks on the Department's compliance with the PRA are divorced from the facts of this case. Contrary to Amici's assertions, the facts here actually illustrate the seriousness with which the Department takes its PRA obligations, in light of the extensive search for records—involving more than eighty-two staff and ninety-three hours of searching for and reviewing records—that the Department conducted in response to Cousins' request. CP 1454-57. Consistent with this, the superior court specifically found that its "search was adequate, reasonable, and conducted in a manner to timely produce the requested records." CP 1794. Cousins does not challenge that well supported finding, which rebuts Amici's repeated and unsupported claim that the search was inadequate.

Even leaving aside the facts of this case, Amici's suggestion that the Department routinely fails to comply with the PRA or does not take its PRA obligations seriously is also

unsupported. The Department receives the eleventh most requests of any state or local agency in Washington.[4] The Department devoted more than three million dollars[5] and 34,000 hours[6] to responding to PRA requests in 2021 alone.

Although the Department is named in a substantial number of PRA lawsuits, it faces a unique set of circumstances because it is often the target of abusive PRA requesters. The Legislature has recognized this problem by imposing the penalty limitations discussed by Amici. Specifically, the Legislature enacted RCW

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[4] Information about the Department's public records requests and responses is publically available on the Joint Legislative Audit & Review Committee website. https://leg.wa.gov/jlarc/reports/2023/PubRecordsDataCollection/default.html. Information about the number of requests by agency is available at: https://public.tableau.com/app/profile/jlarc/viz/2021-Baselinedata/Baselinedashboard

[5] Information about money spent responding to requests is available at https://public.tableau.com/app/profile/jlarc/viz/2021-Metric11/Maindashboard

[6] Information about hours spent responding to requests is available at https://public.tableau.com/app/profile/jlarc/viz/2021-Metric10/Maindashboard

42.56.565(1) "to curb abuses by inmates who use the PRA to gain automatic penalty provisions when an agency fails to produce eligible records," *Faulkner v. Wash. Dep't of Corr.*, 183 Wn. App. 93, 105, 332 P.3d 1136 (2014), and "to discourage profit-driven inmate PRA litigation." *Dep't of Corr. v. McKee*, 199 Wn. App. 635, 648, 399 P.3d 1187 (2017). Amici may disagree with the Legislature's decision to enact these penalty limitations. However, this appeal does not involve the interpretation of RCW 42.56.565(1) and even if it did, the policy decision to amend or eliminate RCW 42.56.565(1) is for the Legislature to make.

Rather than providing concrete evidence of the Department's purported non-compliance with the PRA, Amici cite to five cases (one published and four unpublished)[7] in the

[7] *Faulkner v. Dep't of Corr.*, 183 Wn. App. 93, 332 P.3d 1136 (2014); *Padgett v. Dep't of Corr.*, No. 51081-2-II, 9 Wn. App. 2d 1040, 2019 WL 2599159 (2019); *Curtis v. Dep't of Corr.*, No. 54758-9-II, 2022 WL 1315654 (2022); *Haney v. Dep't of Corr.*, No. 378582-7-III, 22 Wn. App. 2d 1008, 2022

past nine years. According to Amici, these cases involve a pattern of DOC escaping liability for inadequate searches by producing records after a requester raises concerns through a lawsuit or internal appeal. Amici Br., at 8-9. Contrary to Amici's suggestion that this demonstrates that the Department is a bad actor when it comes to responding to PRA requests, this conduct actually demonstrates a genuine attempt to resolve a requester's concerns. Indeed, the logical implication of Amici's argument is that agencies should avoid providing additional records after the requester raises concerns. Following Amici's suggestion would actually create a perverse incentive for agencies to not provide additional records when the requester raises such concerns. Continued efforts at communication and responsiveness, however, should be encouraged, not demonized.[8]

WL 1579881 (2022); *Thurura v. Wash. Dep't of Corr.*, No. 36512-3-III, 15 Wn. App. 2d 1047, 2020 WL 7231100 (2020).

[8] This argument also appears to contradict Section III.B.2 of Amici's Brief, in which Amici themselves maintain that the PRA works best when agencies attempt to resolve a requester's

Regardless, five examples in nine years cannot plausibly demonstrate some kind of pattern of non-compliance with the PRA. In this same nine-year period, the Department has received tens of thousands of requests.[9] Five cases among tens of thousands of requests do not demonstrate a pattern of non-compliance.

Moreover, the cases identified by Amici do not support their arguments in this case or the suggestion that the Department is a bad actor. Four of the cases cited (*Haney*, *Curtis*, *Padgett*, and *Faulkner*) do not involve any determination that the Department's search was inadequate. The remaining case, *Thurura*, involved a finding that the search was inadequate, but that there were no responsive records. *Thurura*, 2020 WL

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concerns. Amici Br., at 13. Amici make no attempt to explain this contradiction.

[9] In 2020 and 2021, the Department received over 6,000 requests each year. *See supra* footnote 4 (providing link to information about number of requests). Assuming similar numbers for 2014 through 2019, the Department has received approximately 54,000 requests in this time period.

7231100, at *5-6. Given that result, the Court of Appeals awarded the requester the only remedy available to a self-represented litigant in such circumstances, costs. *Id.* These cases do not establish that the Department has been escaping liability for inadequate searches.

As indicated above, in four of the five cases cited by Amici, despite Amici's implication to the contrary, the Court of Appeals did not conclude that the Department's search was inadequate. In *Haney*, the Court did not assess the merits of the requester's claims because it analyzed only the statute of limitations. *Haney*, 2022 WL 1579881, at *4-5. In *Padgett*, the Court explicitly declined to address the issue of whether the Department conducted a reasonable search. *Padgett*, 2019 WL 2599159, at *10. And in *Curtis*, the Court expressly concluded that "the Department conducted a reasonable search for the

records and complied with its PRA policy." *Curtis*, 2022 WL 1315654, at *6.[10]

Similar to *Curtis*, the Court in *Faulkner* concluded that the Department's search was reasonable and did not amount to bad faith. *Faulkner*, 183 Wn. App. at 107. In that case, the public records specialist made an inadvertent error in forwarding the language of the request to staff to search for records. *Faulkner*, 183 Wn. App. at 107. This resulted in the requester being given an unsigned copy of the record (a legal mail log). *Id.* at 97. When Faulkner submitted an internal appeal, the Department provided him a copy of a signed version. *Id.* at 98. Faulkner then filed suit and the Court agreed that the Department's conduct did not rise to the level of bad faith to warrant penalties because, among other factors, it conducted a reasonable search. *Id.* at 107-08.

[10] In *Curtis*, the Department did not cross appeal the superior court's finding that it violated the PRA so the Court of Appeals was not asked to decide whether the superior court correctly determined the Department violated the PRA.

Amici's citation to *Faulkner* undermines their purported interest in crafting rules that encourage cooperation without litigation because in that case, the Department provided the record before the lawsuit was filed to address the requester's concerns. In other words, the requester did not need to file suit to obtain the record. In another section of their brief, Amici express concerns about "unnecessary lawsuits" and creating rules that punish requesters who try to resolve disputes without litigation. Amici Br., at 13-16. Amici's reliance on *Faulkner* demonstrates that Amici—contrary to what they suggest elsewhere in their brief—primarily wish to preserve the requester's ability to sue regardless of the agency's efforts to address a requester's concerns, rather than to craft rules where litigation can be avoided through further communication.

Finally, with respect to *Thurura*, the Court of Appeals did conclude that the Department's search for metadata was inadequate. However, the requested metadata did not exist. *Thurura*, 2020 WL 7231100, at *4 n.3. Contrary to Amici's

suggestion, *Thurura* did not involve a situation where the requester was provided the responsive records after the lawsuit, because the records did not exist. *Id.* And rather than escaping liability, the Court of Appeals awarded costs against the Department, which is the only remedy available to the requester for this type of PRA violation. *Thurura*, 2020 WL 7231100, at *6.

In sum, Amici's unsupported attacks on the Department do not present a basis for review.

III. CONCLUSION

This Court's decision in *Belenski* encourages expeditious resolution of PRA claims. And when the statute of limitations expires on a given request, the requester can still obtain records through another request. The decision below is consistent with

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Belenski and does not implicate issues of substantial public interest. The arguments presented by Amici do not support review.

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RESPECTFULLY SUBMITTED this 9th day of June, 2023.

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CERTIFICATE OF SERVICE

I certify that on the date below I filed the DEPARTMENT'S RESPONSE TO BRIEF OF AMICI CURIAE AMERICAN CIVIL LIBERTIES UNION OF WASHINGTON, COLUMBIA LEGAL SERVICES, AND WASHINGTON COALITION FOR OPEN GOVERNMENT with the Clerk of the Court using the electronic filing system, which will notify the following electronic filing participants:

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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 this 9th day of June, 2023, at Olympia, WA.

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