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SUPREME COURT NO. 1028636
COURT OF APPEALS NO. 393828-III

IN THE SUPREME COURT
OF THE STATE OF WASHINGTON

CYNTHIA HEBERT and JAMES D. HEBERT,
husband and wife,

Petitioners,

v.

SPRING CREEK EASEMENT OWNERS ASSOCIATION
(RMA) BOARD OF TRUSTEES,

Respondents.

FILBERT HILL'S ANSWER TO PETITION FOR REVIEW

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I. INTRODUCTION

Filbert Hill, the bona fide purchaser at the sheriff's sale, submits this Answer to the Heberts' Petition for Review. The Heberts' property was sold at the sheriff's sale to satisfy a judgment in favor of Spring Creek Easement Owners Association ("Spring Creek"). In its Unpublished Opinion, Division III of the Court of Appeals correctly denied the Heberts' request for equitable relief from the trial court's prior supplemental judgment regarding disbursement of the funds from the sheriff's sale, as follows:

The Hebert's contentions on appeal are premised on an indirect challenge to the validity of a prior supplemental judgment, which was not appealed. Because this prior judgment became final and unassailable in this appeal, the Heberts' arguments fail. We affirm the superior court's order[.]

See Court of Appeals' Unpublished Opinion at 1-2.

The Heberts' Petition for Review should be denied because they have failed to demonstrate any basis for discretionary review under RAP 13.4(b). Moreover, in seeking equitable relief, the

Heberts fail to disclose that the prior judgment on which their claim is based was prepared by their own attorney (thus invoking the invited error doctrine); and, without any citation to the record, the Heberts falsely assert that Filbert Hill was not a bona fide purchaser at the sheriff's sale. These facts alone would defeat the Heberts' claim for equitable relief even if they had appealed the prior supplemental judgment in question.

Accordingly, because the Heberts' grounds for seeking discretionary review are baseless, and their presentation of the facts are misleading and fatal to their claim for equitable relief, Filbert Hill requests that sanctions be awarded against the Heberts or their counsel under RAP 18.9(a).

II. RESPONDENT'S STATEMENT OF THE ISSUES

1. Have the Heberts raised a ground for discretionary review under RAP 13.4(b)(4)?
2. Should Filbert Hill be awarded attorney's fees under RAP 18.9(a) because the Heberts' petition is frivolous and/or violates the Rules of Appellate Procedure?

III. STATEMENT OF THE CASE

The relevant facts necessary to deny the Heberts' Petition for Review are summarized in the Court of Appeals' Unpublished Opinion, as well as in the petition itself. However, additional detail is necessary to properly consider Filbert Hill's request for sanctions under RAP 18.9(a). Such detail will be provided as part of the argument in support of Filbert Hill's sanctions request.

IV. ARGUMENT

A. The Heberts Have Failed to Meet the Requirements Under RAP 13.4(b) to Warrant Discretionary Review.

RAP 13.4(b) provides:

A petition for review will be accepted by the Supreme Court **only**:

- (1) If the decision of the Court of Appeals is in conflict with a decision of the Supreme Court; or
- (2) If the decision of the Court of Appeals is in conflict with a published decision of the Court of Appeals; or
- (3) If a significant question of law under the Constitution of the State of Washington or of the United States is involved; or

(4) If the petition involves an issue of substantial public interest that should be determined by the Supreme Court.

(Emphasis added.) The Heberts do not argue that the Unpublished Opinion involves a significant question of state or federal constitutional law under RAP 13.4(b)(3). Rather, they argue that review is proper under RAP 13.4(b)(1), (2), and (4). Each of these alleged grounds for review is, however, facially without merit.

1. The Unpublished Opinion is Not in Conflict With Any Decision of This Court.

The Heberts' petition is essentially a meaningless synopsis of statutory redemption rights on foreclosed real property and equitable relief, which do not apply under the unique facts of this case. More importantly, the Heberts fail to demonstrate how the Court of Appeals' Unpublished Opinion conflicts with any decision of this Court. Indeed, the Court of Appeals' decision did not rely or otherwise depend on this Court's prior decisions regarding the law of statutory redemption, or when equity will grant relief from a party's failure to comply with the statutory requirements.

To the contrary, the Court of Appeals affirmed the trial court's decision simply because the Heberts failed to timely appeal the trial court's prior final supplemental judgment. *See* Unpublished Opinion at 8-11.

In short, the Court of Appeals' decision turned on the unique facts of this case; specifically, whether the Heberts timely appealed the judgment in question, which is an issue they failed to raise and meaningfully address in their Petition for Review. The Court of Appeals' passing reference to Washington's statutory right of redemption, at page 3 of the Unpublished Opinion, is not in conflict with any decision of this Court. Likewise, the Unpublished Opinion's legal analysis of the principles regarding equitable relief, and the finality of judgments and the timeliness of taking an appeal, are not in conflict with any decision of this Court. *See* Unpublished Opinion at 7-8, 10-11.

Accordingly, the Heberts' request for discretionary review under RAP 13.4(b)(1) is without merit.

2. The Unpublished Opinion is Not in Conflict with a Published Decision of the Court of Appeals.

The preceding arguments apply with full force and effect here. Tellingly, the Heberts admit that their request for equitable relief turns on the unique facts of this case, thus undermining their argument that the Unpublished Opinion conflicts with published Court of Appeals' decisions. In the Heberts' own words:

While the precise facts here are unique, Division III's opinion conflicts with *the guidelines* established by published precedent that should govern equitable relief in the context of forfeiture sales, thus warranting review. RAP 13.4(b)(1), (2).

Pet. for Rev. at 22 (emphasis added). The Heberts, however, fail to meaningfully explain how the "unique" facts of this unpublished case conflict with "the guidelines" set forth in published cases so that this Court should intervene to resolve the alleged, but never established, conflict. "This court will not consider claims insufficiently argued by the parties." *See, e.g., State v. Elliott*, 114 Wn.2d 6, 15, 785 P.2d 440 (1990).

No case relied upon by the Heberts remotely involves the

unique, dispositive facts on which the Court of Appeals' Unpublished Opinion was decided; that is, the Heberts' failure to file an appeal from the final supplemental judgment from which they now seek equitable relief. RAP 5.2(a) mandates that an appellant must file a notice of appeal within thirty days of entry of the final judgment, which the Heberts failed to do. *See Unpublished Opinion* at 8. And the Heberts have failed to cite any authority that would grant them equitable relief from such failure. "Contentions that are not supported by argument or authority will not be considered by [this Court]." *Talps v. Arreola*, 83 Wn.2d 655, 657, 521 P.2d 206 (1974).

Moreover, "[u]npublished opinions of the Court of Appeals have no precedential value and are not binding on any court." GR 14.1(a). This rule further establishes that there is simply no conflict with the Unpublished Opinion and a published decision of the Court of Appeals that would require acceptance of review by this Court. The Heberts' reliance on RAP 13.4(b)(2) as a ground for discretionary review is thus unwarranted.

3. The Unpublished Opinion Does Not Involve an Issue of Substantial Public Interest That Should be Determined by This Court.

As the Heberts admit, and as evident from the Court of Appeals' Unpublished Opinion, which is of no precedential value per GR 14.1(a), the facts of this case are unique. *See* Pet. for Rev. at 22; Unpublished Opinion at 2-6. Moreover, the Heberts' petition makes clear that the case law governing the statutory right of redemption and equitable relief are well-developed. *See* Pet. for Rev. at 1, 13-15, 16-24. Accordingly, resolution of this uniquely private dispute does not involve "an issue of substantial public interest that should be determined by [this Court]." RAP 13.4(b)(4).

The Heberts have failed to identify any similar appeal or case, and they have not established any other reason that would make this Court's resolution of this fact-specific private dispute an issue of substantial public interest. In short, because the resolution of this unique dispute will affect nobody besides the parties themselves, the Heberts' request for review under RAP 13.4(b)(4) is baseless.

B. Filbert Hill Should be Awarded Fees and Costs Against Heberts or Their Counsel as Sanctions Under RAP 18.9(a).

RAP 18.9(a) authorizes this Court to order “a party or counsel” who “files a frivolous appeal, or fails to comply with these rules to pay terms or compensatory damages to any other party who has been harmed [thereby].” “An appeal is frivolous if there are no debatable issues upon which reasonable minds might differ and it is so totally devoid of merit that there was no reasonable possibility of reversal.” *Fay v. Northwest Airlines, Inc.*, 115 Wn.2d 194, 200-201, 796 P.2d 412 (1990). Such is the case here.

1. The Heberts Failed to Raise the Court of Appeals’ Actual Holding as an Issue for Review, and There is No Reasonable Grounds for Reversal.

The Court of Appeals correctly upheld the trial court’s decision because the Heberts failed to timely file an appeal within the mandatory thirty-day deadline after entry of the final judgment in question. *See* Unpublished Opinion at 1-2, 8-10. There is no debatable issue upon which reasonable minds can differ regarding this fact; hence, there is no reasonable possibility of reversal. The

Heberts themselves concede this inescapable conclusion because they have failed to cite a single authority that would grant them equitable relief from their failure to appeal. “Where no authorities are cited in support of a proposition, the court is not required to search out authorities, but may assume that counsel, after diligent search, has found none.” *DeHeer v. Seattle Post-Intelligencer*, 60 Wn.2d 122, 126, 372 P.2d 193 (1962).

Moreover, the Heberts have failed to meaningfully address the Court of Appeals’ holding; that is, their failure to file an appeal from the final judgment they dispute. In fact, the Heberts failed to even raise this as an issue for review. *See* Pet. for Rev. at 3. This failure violates RAP 13.4(c)(5) and RAP 10.3(a)(4) and is, by itself, fatal to the Heberts’ petition, thus compelling its denial and an award of sanctions. *See, e.g., State v. Collins*, 121 Wn.2d 168, 178-79, 847 P.2d 919 (1993) (holding that, pursuant to RAP 13.4(c)(5), an issue presented for review must be concisely stated in the issues for review and not in the argument section) (citing *Clam Shacks of Am., Inc. v. Skagit County*, 109 Wn.2d 91,

98, 743 P.2d 265 (1987)); *see also* RAP 18.9(a) (authorizing sanctions for filing a frivolous appeal or failing to comply with the Rules of Appellate Procedure).

2. The Heberts Falsely Assert That Filbert Hill Was Not a Bona Fide Purchaser at the Sheriff’s Sale, Which is Fatal to Their Claim for Equitable Relief.

Instead of raising and arguing the issue of why the Court of Appeals erred in its holding, and why they are entitled to equitable relief for failing to appeal the trial court’s final judgment in question, the Heberts incorrectly assume their appeal was proper, then raise the following single issue in their Petition for Review:

Does a trial court have power to provide equitable relief to the statutory redemption process and/or allow a party the opportunity to cure a deficiency with redemption if equity demands to prevent the unjust forfeiture of a family home, thereby preventing an inequitable windfall to *a speculative purchaser* in a foreclosure sale?

See Pet. for Rev. at 3 (emphasis added); *see also id.* at 2 (asserting, without citation to the record, that the Heberts’ home “was sold at [the] sheriff’s sale to a speculative real estate company”).

The Heberts thus imply that Filbert Hill was not a bona fide

purchaser at the sheriff's sale; yet their petition fails to cite to the record, or otherwise provide a shred of evidence, to support this position. *See, e.g.*, Pet. for Rev. at 3-13 (Heberts' Statement of the Case). Sanctions against the Heberts under RAP 18.9(a) are thus warranted for their "failure to comply with [the Rules of Appellate Procedure]." Specifically, RAP 10.3(a)(5) requires a party to present "[a] fair statement of the facts and procedure relevant to the issues presented for review, without argument." The Heberts have failed to do so.

Moreover, the Heberts' entire equitable argument rests on their above lack of candor. After conceding they would not be entitled to equitable relief if Filbert Hill was a bona fide purchaser, the Heberts assert, again without citation to the record, that "Filbert Hill is not a *bona fide* purchaser." *See* Pet. for Rev. at 19, note 2. The law is well-settled that appellate courts do not consider arguments that are not supported by any reference to the record. *See, e.g., Cowiche Canyon Conservancy v. Bosley*, 118 Wn.2d 801, 809, 828 P.2d 549 (1992) (citing RAP 10.3(a)(5); *McKee v.*

American Home Prods. Corp., 113 Wn.2d 701, 705, 782 P.2d 1045 (1989)).

As the Heberts acknowledge: “A bona fide purchaser for value is one who without notice of another’s claim of right to, or equity in, the property *prior to his acquisition* of title, has paid the vendor a valuable consideration.” *See* Pet. for Rev. at 19, note 2 (emphasis added) (quoting *Miebach v. Colasurdo*, 102 Wn.2d 170, 175, 685 P.2d 1074 (1984)). It is uncontroverted that, at the time of the sheriff’s sale on December 10, 2021 (CP 8), Filbert Hill had no knowledge of any legal or equitable interest in the property other than the Heberts’ statutory redemption right. Indeed, the dispute over whether the Heberts failed to comply with the redemption statute did not arise until after the Heberts’ attorney drafted the order entered by the trial court on June 14, 2022. CP 151-154; Unpublished Opinion at 2, 4-6.

Besides failing to provide any evidence to support their naked assertion that Filbert Hill was not a bona fide purchaser, the Heberts misleadingly cite *Casa del Rey v. Hart*, 110 Wn.2d 65,

71, 750 P.2d 261 (1988), in arguing that “[a] party who purchases an interest `solely to satisfy a judgment’ knowing `that *third parties* claimed ownership or rights in the property’ is not a *bona fide* purchaser.” See Pet. for Rev. at 19, note 2 (emphasis added). The Heberts, however, do not have *a third-party ownership claim* in their own property.¹

Moreover, the Heberts again fail to cite to the record, or provide any other evidence, that Filbert Hill had knowledge of any third party’s (in this case Spring Creek’s) interest in the property at the time of the sheriff’s sale. CP 8, 151-154. To the contrary, during oral argument before the trial court, held on October 10, 2022, some ten months after the sheriff’s sale of December 10, 2021, the Heberts’ counsel admitted that Filbert Hill “to the best

¹ Although Filbert Hill, like any other similar purchaser of property at a sheriff’s sale, presumably had knowledge of the Heberts’ statutory redemption right, such knowledge cannot, as a matter of law, disqualify Filbert Hill from being a bona fide purchaser; otherwise, there could never be a bona fide purchaser at any sheriff’s sale under RCW 6.23.020.

of my knowledge has acted in good faith[.]” VRP at 12; CP 8.

The Heberts’ above misrepresentations of the record and legal authority are egregious and violate the Rules of Appellate Procedure, including RAP 10.3(a)(5). It is beyond reasonable debate that the Heberts’ petition for equitable relief fails because Filbert Hill was a bona fide purchaser. Sanctions are thus warranted under RAP 18.9(a). *Fay*, 115 Wn.2d at 200-201.²

3. The Superseded Judgment on Which The Heberts Relied Was Prepared by Their Own Attorney, Thus Barring Their Claim For Equitable Relief Under the Invited Error Doctrine.

Further warranting sanctions under RAP 18.9(a) is the Heberts’ failure to disclose to this Court that it was their own attorney who prepared and presented the very judgment upon which

² At pages 28-30 of its respondent’s brief filed with the Court of Appeals, Filbert Hill pointed out that the Heberts failed to produce any evidence to indicate that Filbert Hill was not a bona fide purchaser at the sheriff’s sale on December 10, 2021. This Court should not treat lightly the fact that the Heberts have repeated this failure in their Petition for Review, despite having been put on notice of same.

they now claim they mistakenly relied in failing to comply with the statutory redemption requirements. CP 151-154. “A party cannot properly seek review of an alleged error which the party invited.” *Davis v. Globe Mach. Mfg. Co., Inc.*, 102 Wn.2d 68, 77, 684 P.2d 692 (1984).

Filbert Hill did not contribute to the Heberts’ counsel’s preparation and presentation of that order; indeed, Filbert Hill had no knowledge of the order until after it was entered (Filbert Hill was neither served with a copy of the proposed order nor the notice of its presentation to the trial court (CP 144-154); nor was Filbert Hill present at the hearing when the Heberts’ counsel caused the court to sign the order (CP 155)).

In short, the Heberts’ claim for equitable relief against Filbert Hill also appears to rest upon their bald assertion that, after acquiring the property at the sheriff’s sale, Filbert Hill failed to take any action to challenge the trial court’s subsequent judgment, which was prepared by the Heberts’ own counsel and which they claim caused them to fail to redeem their property.

However, in the absence of a fiduciary or other special relationship, which does not exist here, Filbert Hill had no duty to speak or otherwise relieve the Heberts from the consequences of their self-inflicted mistake. *Oates v. Taylor*, 31 Wn.2d 898, 904, 199 P.2d 924 (1948) (where the parties are dealing at arms-length, there is no duty to speak where the relevant facts and information are equally available to both parties); *Ticor Title Ins. Co. of California, Inc. v. Nissell*, 73 Wn.App. 818, 824, 871 P.2d 652 (1994) (there was no duty to speak where “both parties knew the underlying facts regarding [the] lien, and each could determine the law”).

A party may not base a claim of equitable estoppel, which is essentially what the Heberts are doing, where the claim is based on their own conduct. *Nissell*, 73 Wn.App. at 824-25; *see also Saunders v. Lloyd’s of London*, 113 Wn.2d 330, 340-42, 779 P.2d 249 (1989).

4. The Heberts’ Grounds for Review Are Frivolous.

Sanctions under RAP 18.9(a) are also appropriate because the three grounds upon which the Heberts base their Petition for

Review (RAP 13.4(b)(1), (2), (4)) are frivolous, for the reasons stated above in responding to those grounds. In short, there is no debatable issue upon which reasonable minds might differ as to whether the Court of Appeals' Unpublished Opinion conflicts with a prior decision of this Court (it clearly does not), conflicts with published opinions of the Court of Appeals (again, it clearly does not), or involves an issue of substantial public interest that should be determined by this Court. The Heberts themselves admit that the facts of this case are unique, and an unpublished opinion involving a dispute among private parties that does not affect existing law cannot reasonably be said to involve an issue of substantial public interest.

Accordingly, sanctions should be awarded against the Heberts or their counsel for filing a frivolous Petition for Review. *Fay*, 115 Wn.2d at 200-206.

V. CONCLUSION

For the above reasons, Filbert Hill asks this Court to affirm the Court of Appeals' Unpublished Opinion and award attorney's

fees and costs to Filbert Hill as sanctions against the Heberts or their counsel for filing a frivolous appeal and/or repeatedly and flagrantly violating the Rules of Appellate Procedure, especially RAP 10.3(a)(5)'s mandate of presenting "[a] fair statement of the facts and procedure relevant to the issues presented for review," with "[r]eference to the record . . . for each factual statement."

VI. CERTIFICATE OF COMPLIANCE

This document contains 3164 words, excluding the parts of the document exempted from the word count by RAP 18.17.

DATED this 3rd day of April, 2024.

Respectfully submitted,

**LATHROP, WINBAUER, HARREL
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I certify that on the 3rd day of April, 2024, I caused a true and correct copy of this document to be filed and served on the following Attorneys for Petitioner via the Washington State Appellate Court's Secure Portal Electronic Filing System, and via Electronic Mail:

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