No. 90620-3

SUPREME COURT OF THE STATE OF WASHINGTON

EDWARD O. GORRE
Respondent,

v.

CITY OF TACOMA
Petitioner,

THE DEPARTMENT OF LABOR AND INDUSTRIES
FOR THE STATE OF WASHINGTON,
Defendant.

RESPONDENT'S REPLY TO PETITION FOR REVIEW

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I. IDENTITY OF RESPONDENT

Lt. Gorre is a career firefighter employed by the self insured employer, City of Tacoma. He suffers from respiratory diseases: eosinophilic lung disease and coccidioidomycosis. Coccidioidomycosis (i.e. Valley Fever) also an infectious disease.

RCW 51.32.185 presumes that any respiratory disease and any infectious disease is caused by employment as a firefighter. Because the presumption was not overcome by a preponderance of admissible evidence as required by RCW 51.32.185(1), Lt. Gorre is entitled to all the benefits provided by the Industrial Insurance Act (IIA). Because firefighting need only be a proximate cause of his respiratory and infectious disease conditions, and firefighting as a proximate cause of his diagnosed conditions was not rebutted by a preponderance of admissible evidence, Lt. Gorre is also entitled to attorney fees and costs under the IIA and RCW 51.32.185(7).

II. CITATION TO COURT OF APPEALS DECISION

The SIE seeks review of the decision in: *Gorre v. City of Tacoma*, 180 Wash.App. 729, 324 P.3d 716 (2014).

III. ISSUES PRESENTED FOR REVIEW

A. The Court of Appeals, Division II's decision is **not** in **conflict or** direct conflict with the decision of the Court of Appeals, Division I's decision in *Raum v. City of Bellevue*, 171 Wn.App. 124, 286 P. 3d 695 (2012).

B. The Court of Appeals **did not** improperly consider irrelevant and prejudicial factual evidence gather and investigated *ex parte* by the Court of Appeals.

C. The Court of Appeals **did not** improperly apply statutory construction what the SIE says is its "plain language" analysis.

D. The Court of Appeals **did not** improperly rule on a factual dispute not before the Court of Appeals by impermissibly re-weighing the evidence presented at trial.

E. The Court of Appeal's decision **did not** eliminate restrictions on the infectious diseases covered by RCW 51.32.185.

IV. STATEMENT OF THE CASE

Lt. Gorre has been a professional firefighter with the City of Tacoma since March 17, 1997. Edward Gorre, *Depositions: In re: Edward O. Gorre* 09 13340 (2010), 28 (4) (certified board record on file with Division II Court of Appeals). Prior to his employment, he undertook and passed a demanding pre-employment test of physical strength and stamina, and a physical which included blood testing and x-rays. Edward Gorre, *Transcripts: In re: Edward O. Gorre* 09 13340 (2010) 107(13-19) (certified board record on filed with Division II Court of Appeals). In February or March of 2007, Lt. Gorre began to experience symptoms including fatigue, night sweats, chills, and diffuse joint aches. He underwent a lung biopsy. Foreign material and nodules were found in his lungs. Employer's Motion to Compel and Motion to Continue Summary Judgment Proceedings, *Exhibit G: In re: Edward O.*

Gorre 09 13340 (2010)(certified board record on file with Division II Court of Appeals 214-218).

On April 20, 2007, Lt. Gorre reported an RCW 51.32.185 presumptive occupational disease to his Employer after his physician found evidence of respiratory/inhalation injury from the results of his lung biopsy. Self-Insurer Accident Report, *Exhibits: In re: Edward O. Gorre* 09 13340 (2010)(certified board record on file with Division II Court of Appeals).

In April of 2008 a biopsy of a skin nodule indicated Coccidiomycosis, a disease contracted through inhalation and which affects the respiratory system. Lt. Gorre had not been in any endemic area, in the year prior to presenting with symptoms of the Coccidiomycosis, ruling out the contraction of Coccidiomycosis anywhere except in Washington. Dr. Royce Johnson, *Depositions: In re: Edward O. Gorre* 09 13340 (2010), 22 (13-16) (certified board record on file with Division II Court of Appeals).

The most probable, and also the *presumptive*, exposure to Coccidiodomycosis was during the course of Lt. Gorre's occupation as a firefighter. *Id.* at 23(12-24).

Lt. Gorre appealed to the Board of Industrial Insurance Appeals. Hearings were held in June and July of 2010 and the Board ultimately affirmed the Department's March 24, 2009 order. See *In re: Edward O.*

Gorre, BIIA Dec. 09 13340 (2010). Lt. Gorre then timely appealed to the Pierce County Superior Court (CP 941) in a much-abbreviated two hour trial which upheld the Board's Decision and Order denying Lt. Gorre's claim (CP 942). Lt. Gorre timely filed a Notice of Appeal to the Court of Appeals, Division II, which reversed in part and affirmed in part the Pierce County Superior Court's order. CP 944-940; *Gorre*, 324 P.3d 716 The SIE then petitioned the Supreme Court for review on August 7, 2014.

V. ARGUMENT: WHY REVIEW SHOULD BE DENIED

A. The Court of Appeals, Division II's decision is not in direct conflict with the decision of the Court of Appeals, Division I's decision in *Raum v. City of Bellevue*, 171 Wn.App. 124, 286 P. 3d 695 (2012).

There is no conflict in the decisions of the divisions of the Court of Appeals. *Raum* was a presumptive "heart problem" case, not a respiratory disease or infectious disease case. The *Raum* presumption applies only to heart problems "experienced within seventy-two hours of exposure to smoke, fumes, or toxic substances, or experienced within twenty-four hours of strenuous physical exertion due to firefighting activities." In *Raum*, the firefighter also had a family history of cardiac-related death of his father at age 37 and other genetic evidence rebutting the presumption.

The limiting restrictions in RCW 51.32.185 pertaining to "heart problems" are not at issue in Lt. Gorre's case. The SIE is incorrect in its view

on what the *Raum* Court did or did not rule. The *Raum* Court did not hold that discerning the definition of "heart problem" was a question of fact.

In *Raum,* the issue was not the statutory (RCW 51.32.185) meaning of "heart problem," but rather whether *Raum 's* heart problem occurred within 72 hours of exposure to smoke, fumes, or toxic substances or within 24 hours of strenuous physical exertion due to firefighting activities as required by RCW 51.32.185. To that end, *see Raum v. City of Bellevue*, at 153-154, acknowledging that *Raum* had heart problems but ruling against *Raum* on his heart problems' relationship to his job.

In *Gorre*, the Appellate Court did not hold that a decision as to whether or not a claimant's medical condition is a presumptive disease is a question of law. Rather, the Appellate Court interpreted the statutory meaning of "respiratory disease" and "infectious disease" and then looked *to the testimony* before the Board and Superior Court to determine if substantial evidence supported the lower court's ruling. The *testimony* before the Board and Superior Court (opposed to a legal determination by the Appellate Court) overwhelmingly established that Valley Fever was a "respiratory disease". See *Gorre opinion, p. 763.* The Appellate Court leaned on Dr. Johnson's testimony, Dr. Ayars testimony and Dr. Barana's testimony in its analysis in this regard– Dr. Ayars and Dr. Barana were the SIE's experts.

The *testimony* before the lower courts, (opposed to a legal determination by the Appellate Court), overwhelmingly established that Lt. Gorre's condition was **also** an infectious disease. The Appellate Court stated, "Given all the experts who opined that Valley Fever is an infectious disease, we hold that Valley Fever is an " infectious disease" under RCW 51.32.185(1)(d)." *Gorre v. City of Tacoma* at 766.

The SIE has distorted or misconstrued the Appellate Court's holding in *Gorre*.

In *Gorre*, the terms "respiratory" and "infectious" diseases are expressly set forth in the presumptive-disease statute. It is the judiciary's – not the trier of fact's – role to interpret the statute. The Appellate Court in Gorre, interpreted the statute to correctly determine the meaning of "respiratory" and "infectious" diseases.

In *Gorre,* it had to be determined whether Lt. Gorre had a "respiratory" disease and an "infectious" disease, or both -- as those terms are used but not defined by RCW 51.32.185. Interpretation of a statute, for example, the meanings of "respiratory disease" or "infectious disease," are always questions of law. This is different than in *Raum,* where the issue was not the statutory (RCW 51.32.185) meaning of "heart problem," but rather whether *Raum's* heart problem occurred within 72 hours of exposure to

smoke, fumes, or toxic substances or within 24 hours of strenuous physical exertion due to firefighting activities as required by RCW 51.32.185.

B. The Court of Appeals did not improperly consider irrelevant and prejudicial factual evidence gathered and investigated *ex parte* by the Court of Appeals.

The Appellate Court held that the statutory presumption of occupational-disease, set forth in RCW 51.32.185(1), was not applied in Lt. Gorre's case. The Appellate Court remanded the case, so that Lt. Gorre's claim can be afforded this statutory presumption.

The Appellate Court relied on its interpretation of the presumptive-disease statute to determine the meaning of "respiratory disease"and "infectious disease" and also to determine whether the statute limits the presumption to only certain infectious diseases. From there, the Appellate Court looked to the testimony before the Board and Superior Court (primarily the SIE's own experts' testimony) in its analysis of whether the evidence supported Lt. Gorre's Valley Fever as a respiratory disease. It was *undisputed* that Lt. Gorre's Valley Fever was an infectious disease.

Accordingly, the instances where the SIE claims that the Appellate Court went "beyond the record" have no bearing on the Appellate Court's holding that the Board and Superior Court failed to apply the presumption to Lt. Gorre's case. These claimed instances have no bearing on any of the

issues on the SIE's cross-appeal.

Specifically, (a) whether or not Valley Fever is endemic to Washington State, and (b) whether or not *H1N1 (swine flu)* infects the human respiratory tract, and (c) that it was uncommon practice amongst firefighters to wear SCBA for overhaul and not required by the SIE until 2007, and (d) the definition of "pulmonary infiltrate" and (e) the definition of "granulous lesion" has no bearing in the Appellate Court's holding that Lt. Gorre was not afforded the application of statutory presumption nor on any of the issues pertaining to the SIE's cross appeal.

As stated, the Appellate Court relied on its statutory interpretation to discern the meaning of "respiratory disease" and "infectious disease." Once those meanings were determined, the Appellate Court properly deferred to the testimony before the Board and Superior Court with respect to Valley Fever fitting within the meaning of "respiratory disease." To that end, the portion of the Appellate Court's opinion that addresses the testimony with respect to Valley Fever being a "respiratory disease" is found at page 763, and nowhere in that section does the Court use the terms "H1NI" "Swine Flue" "Avian Flu" "pulmonary infiltrate" or "granulous lesion".

Further, as it relates to the Appellate Court's reference to the King County government health services site (footnote 10), the SIE might argue

that the facts as to whether or not Valley Fever is endemic to Washington State *may* have bearing on the issue of rebutting the presumption. However, the Appellate Court did not decide that issue on appeal, and again, that issue has no bearing on the application of the presumption.

These allegedly "beyond-the-record facts" also have no bearing on any of the SIE's issues on cross-appeal. The SIE's "red herring" is a logical fallacy intended to mislead, or distract from the actual question.

Further, the SIE should be required to establish that the references which it deems were "beyond the record" were actually beyond the record. There was a multitude of experts that testified in this case.

C. The Court of Appeals' construction of "respiratory disease" "infectious disease" and "shall be extended to" in RCW 51.32.185 was correct.

The Appellate Court properly pointed out that the term" respiratory disease" is not defined in the statute. Accordingly, the Appellate Court looked to Webster's dictionary for the terms "respiratory" and "disease." This was proper. "When a term is not defined in a statute, the court may look to common law or a dictionary for the definition." *State v. Pacheco*, 125 Wash. 2d 150, 154, 882 P.2d 183 (1994).

Regarding the Appellate Court's analysis of RCW 51.32.185 as it pertains to the presumption for infectious disease, the Appellate Court simply

addressed *the SIE's* argument that the "shall be extended to" language in RCW 51.32.185(4) is restrictive language. The SIE's interpretation, under statutory construction rules or otherwise, is absurd.

The SIE's strained interpretation of "shall be extended to" necessarily advances an argument that the term is ambiguous – yet the SIE impugns the Appellate Court for doing its job to determine the meaning of this statutory term.

At best, or worst, the SIE's argument instigated the Appellate Court's inquiry into the meaning of the statute. Since the terms at issue are not defined in the statute, and the SIE argued for a strained interpretation, the use of canons of statutory construction or reference to legislative history was appropriate.

A court discerns a statute's plain meaning from the ordinary meaning of the language at issue, the context in which that statutory provision is found, related provisions, and the statutory scheme as a whole. *State v. Engel,* 166 Wn.2d 572, 578, 2010 P.3d 1007 (2009). If a term is susceptible to two or more reasonable interpretations, it is ambiguous and the Court may look to other sources of legislative intent. *State v. Garrison,* 46 Wn.App 52, 54-55, 728 P.2d 1102 (1986).

In the case of infectious disease in firefighters, the intent of the

Legislature was to expand, not restrict, the application of the presumption to additional infectious diseases.

The SIE attacks the plain meaning of the "shall be extended to" language of RCW 51.32.185 in a way that favors the SIE, while at the same time attempting to:

> (a) prevent the Court from engaging in well-settled and accepted principals of construction and
>
> (b) prevent the Court from recognizing the overriding policy of the Act that mandates a liberal construction with all doubts in favor of the worker.

The SIE also impugns the Appellate Court for employing the doctrine of liberal construction in its application of the Industrial Insurance Act. However, in applying the Industrial Insurance Act it is the overriding *directive* from this Supreme Court to do exactly what the Appellate Court did. This directive, specific to the application of the Industrial Insurance Act, is different than the typical "statutory construction" analysis put forth by case law for interpreting ambiguous statutes.

The legislature mandated that the Industrial Insurance Act, that is, Title 51,

> **"shall be liberally construed for the purpose of reducing to a minimum the suffering and economic loss arising**

from injuries and/or death occurring in the course of employment." RCW 51.12.010.

The Washington Supreme Court in *Dennis v. Dept. of Labor and Industries,* 109 Wn.2d 467, 745 P.2d 1295 (1987) weighed in on the genesis of the Industrial Insurance Act, including the surrendering of civil remedies in exchange for more certainty and less struggle for the injured worker.

> "In *Stertz v. Industrial Ins. Comm'n,* 91 Wash. 588, 590–91, 158 P. 256 (1916), this court explained the genesis of this state's workers' compensation scheme: The Industrial Insurance Act (Act), RCW Title 51, was the result of a compromise between employers and workers. In exchange for limited liability the employer would pay on some claims for which there had been no common law liability. The worker gave up common law remedies and would receive less, in most cases, than he would have received had he won in court in a civil action, and **in exchange would be sure of receiving that lesser amount without having to fight for it.** Industrial injuries were viewed as a cost of production.
>
> RCW 51.04.010 embodies these principles, and declares, among other things, that "sure and certain relief for workers, injured in their work, and their families and dependents is hereby provided [by the Act] regardless of questions of fault and to the exclusion of every other remedy." To this end, **the guiding principle in construing provisions of the Industrial Insurance Act is that the Act is remedial in nature and is to be liberally construed in order to achieve its purpose of providing compensation to all covered employees injured in their employment, with doubts resolved in favor of the worker.**" *Dennis v. Dep't of Labor & Indus. of State of Wash.*, 109 Wash. 2d 467, 469-70, 745 P.2d 1295 (1987).[emphasis added].

In Lt. Gorre's worker's compensation claim, the SIE attempts to create doubt in the meaning of language within the presumptive-disease statute. The Appellate Court did what the Supreme Court has directed all Courts to do: construe the Industrial Insurance Act liberally, with all doubts in favor of the worker. The "liberal construction" doctrine is specifically linked to interpretation of the Industrial Insurance Act and specifically for ensuring that the policy of the Industrial Insurance Act is upheld.

D. The Court of Appeals did not improperly rule on a factual dispute not before the Court of Appeals by impermissibly re-weighing the evidence presented at trial.

The SIE claims that the Appellate Court "unlawfully re-weighed the testimony and inferences". The Appellate Court properly held that the Board and Superior Court did not apply the statutory presumption, and when so erring, wrongfully placed the burden of proving occupational-disease on Lt. Gorre. *Gorre at 760.*

It cannot be denied that the Board and the Superior Court affirmed the denial of Lt. Gorre's benefits. It cannot be denied that the Board and the Superior Court failed to apply the statutory presumption of occupational disease, and it cannot be denied that the statutory presumption of occupational disease shifts the burden of proof to the SIE to rebut the

presumption by a preponderance of the evidence that firefighting is one of the proximate causes of the disease or diseases.

The Appellate Court did not re-weigh the evidence. Rather, it was addressing the Board and Superior Court's findings that Lt. Gorre's condition was not occupational "because he failed to prove a specific injury during the course of his employment and because he did not contract any respiratory conditions that arose naturally and proximately from distinctive condition of his employment with the City". The Appellate Court did not "re-weigh the evidence," but rather made the point that the presumption had not been applied, yet the Board and Superior Court jumped to erroneous conclusions as to whether Lt. Gorre's condition was occupational. It is the *statutory presumption* that automatically deems Lt. Gorre's condition as "arising naturally and proximately from distinctive condition of his employment" unless rebutted by a preponderance of admissible evidence by the SIE – yet the Board and Superior Court wrongly decided Lt. Gorre's case by not affording him the benefit of the presumption.

The importance that the presumption be applied – before any court jumps to a conclusion – was further developed in footnote 47 of the Appellate Court's opinion, where the Court stated that,

> "Because the Board has not yet considered Gorre's application with the benefit of the statutory presumption and

> its burden-shifting consequence, it is premature for us to address the City and the Department's cross appeal request to hold that the City effectively rebutted the presumption . . ."

Footnote 3, to which the SIE also refers as a "re-weighing of the testimony" is a footnote, wherein the Appellate Court notes that the evidence before the Appellate Court appears insufficient to rebut the presumption that Lt. Gorre's Valley Fever is an occupational disease. Notably, the Appellate Court added the word "appears" in its Amended Opinion, due to the SIE or Department's motion for reconsideration as to that footnote. This footnote has no bearing on the Appellate Court's ultimate holding that the Board and Superior Court failed to apply the statutory presumption of occupational-disease in Lt. Gorre's case.

E. The Court of Appeal's decision did not eliminate restrictions on the infectious diseases covered by RCW 51.32.185.

The SIE has incorrectly interpreted the statute to restrict application of the presumptive disease statute. The SIE's position is contrary to both a plain reading of the statute, and the clear legislative intention behind it for two reasons. First, there is no limiting language in RCW 51.32.185(1)(d) or (4). Nowhere does the statute state the words "any" or "only" in reference to the conditions listed.

The listing of traditionally non-occupational diseases, such as HIV which itself carries a stigma, was meant simply to ensure that those conditions were *also* included as presumptive infectious diseases. Had the legislature intended to limit it to just those conditions, it would have used the language that is present in the subsection immediately prior which limited the presumption to *only* certain types of cancer, which reads as follows:

> (3) The presumption established in subsection (1)(c) of this section ***shall only apply*** to any active or former firefighter who has cancer that develops or manifests itself after the firefighter has served at least ten years and who was given a qualifying medical examination upon becoming a firefighter that showed no evidence of cancer. The presumption within subsection (1)(c) of this section ***shall only apply*** to prostate cancer diagnosed prior to the age of fifty, primary brain cancer, malignant melanoma, leukemia, non-Hodgkin's lymphoma, bladder cancer, ureter cancer, colorectal cancer, multiple myeloma, testicular cancer, and kidney cancer.
> ... [italics bold emphasis added]

RCW 51.32.185(3). In these statutory provisions which *limit* the presumption to specifically-enumerated ailments (e.g. malignant melanoma cancer), the legislature used the words shall "only apply to." [emphasis added]. However, RCW 51.32.185(4), uses the words "shall be extended to"[emphasis added].

The absence of such limiting language in RCW 51.32.185(4) establishes that infectious diseases were not meant to be so limited.

Furthermore, a prior version of the bill *did* seek to specifically limit the infectious diseases presumed occupational by defining "infectious

diseases" for purposes of the Industrial Insurance Act as including only those listed. This version was struck in favor of the more expansive language placed into law. The legislative record also includes a memorandum which, again, mirrors the version of statute for limiting language concerning cancer but no such limiting language for infectious diseases. Claimant's Renewed Motion for Summary Judgment Reply Brief, *Exhibit B: In re: Edward O. Gorre* 09 13340 (2010)(certified board record on file with Division II Court of Appeals 1479-1497).

The Senate Bill Report which states "Infectious diseases, *including* acquired immunodeficiency syndrome, hepatitis A, hepatitis B, hepatitis C, bacterial meningitis, and tuberculosis are presumed to be occupational diseases...". Claimant's Renewed Motion for Summary Judgment Reply Brief, *Exhibit C: In re: Edward O. Gorre* 09 13340 (2010)(certified board record on file with Division II Court of Appeals 1500). The rules of construction have never read the word "including" standing alone to be exclusive; rather, it is a term meant to clarify that certain conditions are specifically added *without* excluding any others. The Washington State Council of Fire Fighters Presumptive Disease Legislation report for the Senate Bill provides that the Senate Bill "seeks to provide additional presumptive coverage to fire fighters by extending infectious disease

presumption to include, *but not limited to*, Acquired Immunodeficiency Syndrom, Hepatis A..." and so forth. Claimant's Renewed Motion for Summary Judgment Reply Brief, *Exhibit D: In re: Edward O. Gorre* 09 13340 (2010)(certified board record on file with Division II Court of Appeals 1503-1505). The plethora of evidence presented unequivocally resolves the issue that the term "infectious disease" under RCW 51.32.185 *does* include *all* infectious diseases, including coccidioidomycosis.

Further, it is important to note that RCW 51.32.185(1)(d), making infectious diseases presumptively occupational, existed as law for 5 years without the existence of RCW 51.32.185(4). The self insured employer's interpretation, that *only* the infectious diseases listed in RCW 51.32.185(4) are presumptively occupational, ignores the statutory presumption of occupational-disease already in effect at that time expressly included infectious diseases.

The SIE's position asks the Appellate Court to adopt a statutory interpretation that is absurd, because if the presumption for infectious diseases are only those listed in RCW 51.32.185(4) then the presumption for infectious diseases already set forth in RCW 51.32.185(1)(d) was meaningless.

Such an interpretation is fatally flawed. When interpreting statutes, strained or absurd results must be avoided. *Briggs v. Thielen,* 49 Wn. App. 650, 654, 745 P.2d 523 (1987), review denied, 110 Wn.2d 1020 (1988).

As an RCW 51.32.185 infectious disease or respiratory disease, coccidioidomycosis is entitled to the mandatory presumption. This presumption has never been rebutted by a preponderance of admissible evidence. The SIE confuses the issue. Lt. Gorre contends that the hypothetical and speculative nature of the SIE's experts' testimony is inadmissible, or, cannot overcome the strong mandatory presumption intended by the legislature. The rank speculation upon which the SIE experts' opine on the issue of causation – caught it on a golf course in Las Vegas – highlights the need for the presumption in RCW 51.32.185. Mere speculation is not sufficient to rebut the presumption by a preponderance of admissible evidence.

Raum involved a firefighter with a presumptive "heart problem". The additional requirements of the presumptive disease statute for heart problems include exposure to smoke, fumes and toxic substances. In *Raum*, there was a family history of genetic heart disease and cardiac related death of his father at age 37. The *Raum* decision was incorrect in its application of the burden of proof. There were differences of opinion regarding causation. However,

firefighting was never ruled out as one of the proximate causes of Raum's heart problems. Even so, *Raum* is not in conflict with this case because there is very substantial evidence of respiratory and infectious disease exposures through out Lt. Gorre's career with the SIE. Further, in *Raum,* the issue was not the statutory (RCW 51.32.185) meaning of "heart problem," but rather whether *Raum's* heart problem occurred within 72 hours of exposure to smoke, fumes, or toxic substances or within 24 hours of strenuous physical exertion due to firefighting activities as required by RCW 51.32.185.

VI. CONCLUSION

The Supreme Court should deny the SIE's Petition for Review.

DATED: October 8th, 2014

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No. 90620-3

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DECLARATION OF SERVICE OF RESPONDENT'S REPLY TO PETITION FOR REVIEW

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DECLARATION OF SERVICE

I declare under penalty of perjury under the laws of the State of Washington that on the date stated below I caused the documents referenced below to be served in the manners indicated below on the following:

DOCUMENTS:
1. RESPONDENT'S REPLY TO PETITION FOR REVIEW; and
2. DECLARATION OF SERVICE.

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The Supreme Court
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DATED this 8th day of October, 2014, at Lacey, Washington.

Mindy Leach, Paralegal

OFFICE RECEPTIONIST, CLERK

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Dear Clerk,

Attached for filing please find:

(1) Respondent's Reply to Petition for Review
(2) Declaration of Service

Case Name: Gorre v. City of Tacoma and The Dept' of Labor and Industries
Case Number: 90620-3
Filed by: Ron Meyers, WSBA 13169 & Tim Friedman, WSBA 37983

If anything further is required, please advise. Thank you.

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