SUPREME COURT NO. 90703-0

IN THE SUPREME COURT OF THE STATE OF WASHINGTON

CAMERON JONES,
a single man,

Plaintiff-Respondent,

v.

HAPA UNITED, LLC,
A Washington Limited Liability Company, doing business as Wave Island Grill and Sushi Bar,

Defendant-Petitioner.

RESPONDENT'S BRIEF IN OPPOSITION TO PETITION FOR REVIEW

Breean Beggs, WSBA # 20795
Attorney for Plaintiff-Respondent
522 W. Riverside, Suite 560
Spokane, WA 99201
Tel: (509) 232-7760
Fax: (509) 232-7762

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A. INTRODUCTION

Plaintiff/Respondent Cameron Jones responds in opposition to Defendant/Appellant Hapa United, LLC's (d/b/a Wave Island Grill and Sushi Bar) Petition for Review and asks this Court to deny the Petition and affirm the Division III Court of Appeals' order reversing the trial court's decision to vacate a default order, based on Defendant's willful failure to timely respond to the Summons and Complaint after being properly served.

B. ISSUES PERTAINING TO PETITIONER'S ASSIGNMENTS OF ERROR

Wave seeks review by this Court alleging that (1) the Court of Appeals did not have jurisdiction to hear the appeal; (2) the Court of Appeals' decision to reverse the trial court is contrary to "well established case law that decision setting aside Default Orders are within the sound discretion of the trial court;" and (3) the Court of Appeals' decision that Wave's "actions amounted to inexcusable neglect is in conflict with other decisions by the Court of Appeals." (Petitioner's Petition for Review, p. 1-2). However, this case is not proper for review by this Court because the Court of Appeals properly asserted jurisdiction over the appeal and there is no conflict between Washington case law and the Court of Appeals' decision.

C. STATEMENT OF THE CASE

Substantive Facts Regarding Service of Process

This case stems from a physical altercation that occurred on or about September 28, 2011. (CP 1-6). The Plaintiff Cameron Jones was a patron at Wave Island Grill and Sushi Bar (hereinafter "Wave"), which is owned and operated by the Defendant Hapa United, LLC and Jordan Troutt. (CP 85-86). Ultimately, Mr. Jones was struck in the face with a club by one of the Defendant's employees, a security guard. (CP 1-6). The striking was unprovoked, was not made with permission or pursuant to any other legal privilege, and constituted illegal assault and battery. (*Id.*). Mr. Jones suffered serious and permanent damage to his face as a result of the assault. (*Id.*).

On February 13, 2012, counsel for Mr. Jones sent a letter to Noel Macagapal, who was thought to be the owner of Wave, requesting that he turn Mr. Jones' claim over to Wave's liability insurer. (CP 94-107). The letter was sent to Wave's physical address of 523 W. First Ave., Spokane, WA. (*Id.*). Mr. Macapagal responded on February 20, 2012 via e-mail stating that he was no longer associated with Wave and that correspondence needed to be directed to Hapa United, LLC at the same address. (*Id.*). That same day, counsel sent a letter to Hapa United, LLC at Wave's physical address of 523 W. First Ave., Spokane, WA. (*Id.*). That

letter indicated that Mr. Jones was represented by counsel, requested that Wave turn Mr. Jones' claim over to their liability carrier, and that a lawsuit would be filed if there was no response by the end of the month. (*Id.*).

There was no response from Wave. (CP 94-107). Counsel for Mr. Jones also made phone calls to Wave. (*Id.*). On one occasion, a woman answered the phone after leaving counsel on hold for a period of time, and indicated that the owner would get back to him. (*Id.*). Mr. Troutt failed to respond, even after being put on notice several times of Mr. Jones' claim. (*Id.*). Efforts then commenced to serve Hapa United, LLC and its owner, Jordan Troutt, prior to filing a lawsuit. (*Id.*).

Counsel for Mr. Jones retained Eastern Washington Attorney Services to serve Wave, though its registered agent Jordan Troutt. (CP 94-107). Between June 11 and July 19, 2012 there were a total of eighteen (18) attempts made to serve Mr. Troutt before service was perfected. (CP 87-93). Finally, Brandi Thomas was able to effect service of the Summons and Complaint on Mr. Troutt on July 19, 2012 by personally handing him a copy of the pleadings. (*Id.*, CP 7). Mr. Troutt was bartending at the time of service. (*Id.*). Despite claiming that he does not recall being served (CP 123-125), Mr. Troutt signed a document confirming that he received the Summons and Complaint. (CP 87-93).

On August 28, 2012, the Summons and Complaint were filed with the Court after still receiving no response from Mr. Troutt. (CP 1-6). A Declaration of Service was filed on August 30, 2012. (CP 7). There was never any response or communication from Wave or Jordan Troutt. (CP 94-107).

Over twenty (20) days had elapsed after the Summons and Complaint were served and filed with no response from the Defendant. (CP 94-107). As a result, an Order for Default was granted by the Court on October 4, 2012. (CP 11). A default judgment for monetary damages was entered on November 16, 2012. (CP 19-20). As of November 16, 2012, there were still no communications from Wave or Mr. Troutt. (CP 94-107).

On November 21, 2012, counsel for Mr. Jones sent a letter to Jordan Troutt at Wave's physical address indicating that a default judgment had been entered against him and collections would be commencing. (CP 94-107). A Notice of Appearance on behalf of Defendant was finally filed on December 19, 2012. (CP 24-25).

Trial Court Proceedings

Wave filed a Motion to Vacate the Order of Default and Default Judgment on March 18, 2013. (CP 67-76). The Motion alleged that "Mr. Trout does not remember being served the Summons and Complaint,"

therefore his failure to respond was a "mistake." (CP 67-76). This argument was repeated by defense counsel at oral argument. (VRP 6, ln. 24). In addition, the Motion contended that the Defendant had a prima facie defense to liability in that (1) "Defendant claims that no employee of Wave struck Plaintiff," and (2) "Defendant also disagrees with Plaintiff's version of the accident." (CP 74). No declarations or affidavits from employees/former employees of Wave were submitted in support of Defendant's motion[1]. (*See generally* Clerk's Papers). Plaintiff properly responded to the Motion (CP 108-117) and oral argument was heard by The Honorable Tari S. Eitzen on April 12, 2013. (VRP 1).

Despite claiming that Mr. Troutt did not recall being served with the Summons and Complaint in their motion papers (CP 67-76), defense counsel stated at oral argument that the Defendant "was served and did nothing with the papers." (VRP 3, ln. 21-22). Specifically, defense counsel stated that "[m]y client doesn't dispute he was served," but instead claims that he was bartending and multi-tasking when he was served so that instance should equate to a "mistake." (VRP 6, lns. 17-24; VRP 10, lns. 13-15). Defense counsel also argued that they presented a prima facie defense by submitting police records showing that the fight was chaotic

[1] Mr. Troutt claims that no security guard from the Wave hit Mr. Jones. However, Mr. Troutt's declaration contains inadmissible hearsay and the declaration therefore does not justify his claim. (CP 86).

(VRP 4, lns. 23-24) and by stating that "no one has ever identified this, quote, bartender." (VRP 5, lns. 7-9). The Defendant admitted that he didn't have supporting affidavits and declarations to prove a defense, but believes that by just stating a defense exists that the Order of Default should be vacated so discovery could occur. (VRP 10, ln.s 20-25). In response, Plaintiff's counsel agreed to allowing the default judgment on damages to be vacated, but not the order of default on liability. (VRP 13; 15). Plaintiff's counsel argued that there was no mistake or neglect in Defendant's failure to answer the Summons and Complaint and that Defendant failed to forward at minimum a prima facie defense, which would have been required to set aside the order of default. (VRP 14).

After hearing oral argument, Judge Eitzen made the following ruling:

> "All right. Here is what we're going to do: this is your lucky day, all right? Because here is what I think happened. **You thought it was going to go away and you were going to ignore it.** You're real busy. Maybe you forgot about it, whatever, but you didn't really get it that this was serious business. And now we have your attention."
>
> "Mr. Beggs is right. I should just uphold the default, but I don't think, when you get to the bottom line, that's doing justice. So I'm going out on a limb because probably he could go to the Court of Appeals and they might reverse me. I want you to know that. I'm going to say that it was inadvertence, mistake on your part. But frankly, the inadvertence, mistake was you were doing a lot of other things and you maybe forgot about it or thought it would go away, because, I don't know, maybe immaturity, maybe a busy,

> forgot or if papers got wet and lost and you didn't think about it anymore."
>
> "So I'm going to call it inadvertence, mistake and I am going to vacate the default judgment and the default."

(VRP 17-18)(emphasis added). There was no ruling made on whether the Defendant presented enough evidence to establish a prima facie defense. (VRP 17-18).

Mr. Jones appealed the trial court's ruling, seeking to reverse Judge Eitzen's decision to vacate the Order of Default, entered on October 4, 2012. (VRP 18). Wave timely responded.

Court of Appeals' Decision

On June 10, 2014, Division III Court of Appeals issued their decision reversing the trial court. Citing WA CR 60(b)(1) and *White v. Holm*, 73 Wn.2d 348 (1968), the court held that Wave was able to present evidence of a prima facie defense. (Petitioner's Petition for Review, Appendix p. 6). However, because the defense was not conclusive, the Court of Appeals ruled that in order to affirm the trial court, Wave's reasons for failing to respond to the properly served Summons and Complaint must be due to mistake, inadvertence, surprise, or excusable neglect. (*Id.*). The Court of Appeals stated that the trial court's compassion for Wave, whose President and registered agent admits to accepting service of the Summons and Complaint but states that he forgot

about it and did nothing, "does not offset Wave's complete lack of response to service," and 'the trial court's decision to vacate the default order lacks tenable grounds or reasons to justify a complete non-response to a properly served Summons and Complaint." (*Id.* at A-8). The Court held that "[b]ecause Wave does not establish a conclusive defense and does not show excusable mistake or inadvertence, it has not met its burden justifying vacation of the default order under CR 60(b)(1)." (*Id.* at A-8, 9). The trial court thus erred in vacating the order and its ruling was reversed. (*Id.* at 9). Wave now petitions this Court for review of the Court of Appeals' decision claiming there was not proper jurisdiction to hear the appeal and that the decision was contrary to established case law.

D. STANDARD OF REVIEW

A trial court's ruling on a motion to vacate or to set aside a default order is reviewed for abuse of discretion. *Prest v. Am. Bankers Life Assur. Co.*, 79 Wn. App. 93, 97 (1995). Abuse of discretion is found if "the trial court exercised its discretion on untenable grounds or for untenable reasons, or that the discretionary act was manifestly unreasonable." *Id.* "Hence, although default judgments are generally disfavored in Washington based on an overriding policy which prefers that parties resolve disputes on the merits, we also value an organized, responsive, and responsible judicial system where litigants acknowledge the jurisdiction of

the court to decide their cases and comply with court rules." *TMT Bear Creek Shopping Center v. PETCO Animal Supplies, Inc.*, 140 Wn. App. 191, 199 (2007)(citations omitted). "Litigation is inherently formal [and] all parties are burdened by formal time limits and procedures." *Id.*, citing *Morin v. Burris*, 160 Wn.2d 745 (2007).

E. LEGAL ARGUMENT

1. The Court of Appeals Had Proper Jurisdiction to Decide the Appeal.

Wave contends that Mr. Jones improperly filed his appeal therefore the Court of Appeals did not have jurisdiction to hear the case. However, the appeal was filed as a matter of right because Mr. Jones was seeking relief from the "Order Granting Defendant's Motion to Vacate Default Judgment." (CP 127-128). As Wave correctly pointed out in its Petition, RAP 2.2(10) states that "an order granting or denying a motion to vacate a judgment" is appealable as a matter of right. Wave has cited to no case law, nor provided any authority, to suggest that appealing only part of such an order changes the nature of the appeal.

Regardless, even if the appeal was improperly designated, Wave's arguments are unfounded. First, Wave provides no case law establishing that the Court of Appeals shouldn't have heard this appeal. Nor is there case law provided to show that Wave was somehow deprived of due

process. Instead, the Rules of Appellate procedure make it clear that in the event a notice of appeal is filed incorrectly, said notice will still be given the correct effect so that the ends of justice are met. Specifically, RAP 5.1(c) states, "a notice of appeal of a decision which is not appealable will be given the same effect as a notice for discretionary review." Similarly, RAP 5.3(f) states, "the appellate court will disregard defects in the form of a notice of appeal or a notice for discretionary review if the notice clearly reflects an intent by a party to seek review." These rules comply with the spirit of the appellate courts' intention to liberally interpret the rules of appellate procedure to "promote justice and facilitate the decision of cases on the merits." RAP 1.2(a), (c). The effect of these rules can be seen in *Coballes v. Spokane County*, 167 Wn. App. 857, 869 (2012), where the plaintiff filed her appeal as a matter of right, when it should have been filed as an appeal seeking discretionary review. The court, citing RAP 5.1(c), held that the notice of appeal was to be redesigned as a notice for discretionary review so that the case could be heard on the merits[2]. (*Id.*).

Even if this Court finds that the appeal should have been designated as one for discretionary review, the Court of Appeals was still entitled to hear the appeal on their own merit as they "may, on its own

[2] The plaintiff was instructed by the court to address whether she could meet the criteria for discretionary review under RAP 2.3(d). *Coballes*, 167 Wn. App. at 869.

initiative or on motion of a party, waive or alter the provisions of any of these rules ... in order to serve the ends of justice...." RAP 18.8(a). Regardless of the reasons why the Court of Appeals heard this case, they ultimately determined that there was an obvious error made by the trial court that warranted a reversal. Under RAP 2.3(b), the Court of Appeals may accept review of a Superior Court decision if that court "has committed obvious error which would render further proceedings useless," or "has committed probable error and the decision of the superior court substantially alters the status quo or substantially limits the freedom of a party to act." The June 10, 2014 decision by Division III revealed that the trial court did commit obvious error as the ruling did not address a key aspect of consideration under CR 60 – whether the defendant presented a defense. (Petition for Review, Appendix p. 8-9). The Court of Appeals determined that there was no conclusive defense, which warranted scrutiny of the remaining CR 60 elements. (*Id.*). Clearly, the Court of Appeals rendered a decision in order to serve the ends of justice and correct an error made at the trial court level. Therefore, even if the appeal was incorrectly designated, it was harmless error and the Court of Appeals had jurisdiction to hear the case under RAP 5.1 and RAP 5.3. Waves' claim that there was no jurisdiction to hear the appeal therefore lacks merit and this case should not be accepted for review.

2. This Case is Not Proper for Review by the Supreme Court.

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

> (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 another 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.

RAP 13.4(b). Wave argues that this Court should accept review based on RAP 13.4(2), claiming that the Court of Appeals' June 10, 2014 decision is in conflict with other Court of Appeals' decisions. (Petition for Review, p. 9, 13). However, the Court of Appeals' decision properly coincides with Washington case law based on the facts of this case. Wave's Petition for Review should therefore be denied.

i. The Court of Appeals Had Proper Justification, Under the Laws of the State of Washington, to Reverse the Trial Courts Decision.

The Washington Supreme Court case of *White v. Holm*, 73 Wn.2d 348 (1968), sets forth four factors that courts are to take into consideration when determining whether to vacate a default under WA CR 60. A moving party must demonstrate:

> (1) That there is substantial evidence extant to support, at least prima facie, a defense to the claim asserted by the opposing party; (2) that the moving party's failure to timely appear in the action, and answer the opponent's claim, was occasioned by mistake, inadvertence, surprise or excusable neglect; (3) that the moving

> party acted with due diligence after notice of entry of the default judgment; and (4) that no substantial hardship will result to the opposing party.

White, 73 Wn. 2d at 352. Importantly, the court elaborated the following:

> [W]here the moving party is able to demonstrate a strong or virtually conclusive defense to the opponent's claim, scant time will be spent inquiring into the reasons which occasioned entry of the default, provided the moving party is timely with his application and the failure to properly appear in the action in the first instance was not willful. On the other hand, where the moving party is unable to show a strong or conclusive defense, but is able to properly demonstrate a defense that would, prima facie at least, carry a decisive issue to the finder of the facts in a trial on the merits, the reasons for his failure to timely appear in the action before the default will be scrutinized with greater care, as will the seasonability of his application and the element of potential hardship on the opposing party.

Id. at 352-53. As a result, when determining whether a party is entitled to have an order vacated, a trial court must inquire into "whether the defendant can demonstrate the existence of a strong or virtually conclusive defense or, alternatively, a prima facie defense to the Plaintiff's claims." *TMT*, 140 Wn. App. at 201. The court's resulting inquiry depends on answering that question first. *Id. See also Johnson v. Cash Store*, 116 Wn. App. 833, 841 (2003)(holding that "[e]stablishment of the first factor avoids a useless subsequent trial.").

In this case, Wave argues that any decision to vacate a default must be left solely to the trial court's discretion. However, Wave fails to address instances when the trial court abuses its discretion, as was done in

this case. (Petition for Review, Appendix p.1). As the Court of Appeals correctly pointed out, the trial court failed to address whether Wave presented any evidence of a defense. (Petition for Review, Appendix p.1). This is a crucial element to determine whether CR 60 warrants vacating a judgment. *White*, 73 Wn.2d at 352. There are no cases cited by Wave justifying a trial court vacating a judgment without discussing the merits of CR 60. The Court of Appeals recognized this in its decision, when it reversed the trial court for abuse of discretion. Instead, the Court of Appeals rendered its decision well within the confines of Washington case law, rendering this petition meritless. (*See infra* Section 2(ii)).

ii. Pursuant to Washington Case Law, Wave's Failure to Respond to the Summons and Complaint was Inexcusable Neglect.

The Court of Appeals correctly determined that under relevant Washington case law, Wave's explanations for failing to respond to the Summons and Complaint did not amount to excusable neglect. (Petition for Review, Appendix p. 8). Specifically, Wave failed to establish excusable mistake or inadvertence under Washington law. (*Id.*). The Defendant's burden to explain why he failed to answer the Summons and Complaint is equally as important as establishing that he has a valid defense. *Prest*, 79 Wn. App. at 99.

The Court of Appeals cited three Washington cases in support of their decision to reverse the trial court. In *TMT Bear Creek Shopping Center, Inc. v. Petco Animal Supplies, Inc*, 140 Wn. App. 191, 213 (2007), Division I held that it was inexcusable that the defendant:

> failed to ensure that the legal assistant responsible for entering the deadline into the calendaring system did so before she left on an extended vacation, subsequently failed to ensure that employees hired to replace that assistant were trained on the calendaring system and competent in operating it, and failed to institute any other procedures necessary to ensure that PETCO's general counsel received notice of the dispute.

The Court held that "if a company's failure to respond to a properly served summons and complaint was due to a break-down of internal office procedure, the failure was not excusable." *TMT*, 140 Wn. App. at 212.

In *Prest v. American Bankers Life Assurance Co.*, 79 Wn. App. 93, 100 (1995), Division II of the Court of Appeals held that it was inexcusable when the file containing a properly served summons and complaint was "mislaid" and not properly forwarded to the proper personnel in time to answer it.

Finally, in *Brooks v. Univeristy City, Inc.*, 154 Wn. App. 474, 479 (2010) Division III decided a case where the defendant was properly served with a summons and complaint, but failed to respond. The Court denied the defendant's request to vacate an order of default reasoning that the defendant "got it, sat on it, didn't do anything." *Id.* Citing to *Prest*, the

court reasoned that the trial court's decision was not an abuse of discretion and the court had tenable reasons to conclude that there was a failure to show excusable neglect because the defendant appeared late in the action "after being served with a summons because its own registered agent failed to forward the summons to its legal department." *Id.*

Similar to the case law set forth above, the Court of Appeals found that Wave and Jordan Troutt had no justifiable excuse for failing to answer the Summons and Complaint in this case. In fact, Mr. Troutt argued to the court that he does not dispute being served (VRP 6, 10), but that he made a "mistake" in not answering because he was bartending, multi-tasking, busy, and set it down and forgot it. (VRP 3, 6). This is right on point with the *Brooks* holding. The trial court acknowledged that Mr. Troutt inappropriately ignored the summons in hopes that it would go away, but then agreed with the Defendant and ruled that failure to answer was based on "inadvertence, mistake" based on Mr. Troutt's alleged busy bartending duties at the time he was served, his immaturity, or that he forgot. (VRP 17-18). The Court of Appeals decision correctly infers that there is no Washington case law to support vacating a judgment based on forgetfulness, being busy or immature; in fact, the opposite is true. Ignorance of the summons and complaint or the law is plainly not

excusable. *See Hwang v. McMahill*, 103 Wn. App. 945, 952 (2000)(holding that being too upset or impatient to read properly served legal papers does not warrant a finding of excusable neglect under CR 60(b)(1)). The Court of Appeals considered facts that the Superior Court should have taken into consideration, i.e. the reason for Wave's failure to timely appear was that Mr. Troutt ignored the Summons and Complaint thinking it would just go away. (VRP 17). Despite Wave's claims, this reasoning is far beneath an innocent breakdown in office procedures, which does not equate to excusable behavior as a matter of Washington law[3].

In an attempt to reinstate the trial court's ruling, Wave now contends for the first time that the Court of Appeals should have rendered its decision pursuant to *Boss Logger, Inc. v. Aetna Casualty & Surety Co.*, 93 Wn. App. 682 (1999) instead of the illustrative *TMT Bear*, *Prest*, and *Brooks* line of cases. Wave's attempt is misplaced however because in *Boss Logger*, Division I found that the defendant had a conclusive defense and did not heavily address Washington's case law addressing inexcusable neglect. 93 Wn. App. at 689. In our case, the Court of Appeals did not

[3] What's more interesting is that defense counsel even appeared to agree that entry of the Default Order on liability was appropriate and implied that they only want a trial on damages. (VRP 7-9).

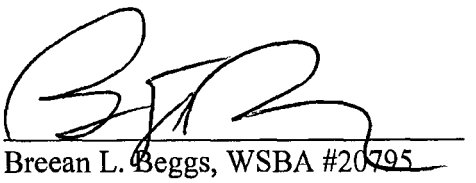
find that Wave had a conclusive defense, only a prima facie defense. (Petition for Review, Appendix p. 8). Therefore, under Washington law, the Court was required to take a detailed look at the facts surrounding Wave's "mistake" claim. *See White*, 73 Wn.2d at 352-53.

The Court of Appeals properly applied Washington law to the facts in this case when it rendered its decision. Wave's claim that the decision is in conflict with other court of Appeals decisions is therefore unjustified. This is not a proper case to be heard by the Supreme Court and therefore the Court of Appeals decision should stand.

F. CONCLUSION

Based on the foregoing, Mr. Jones respectfully requests that this Court deny the Petition for Review and affirm the Division III Court of Appeals' decision to reinstate the Default Order, granted October 4, 2012.

Respectfully submitted October 1, 2014.



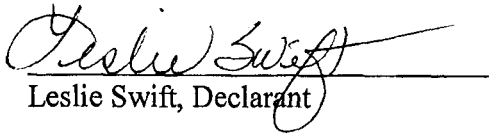
Breean L. Beggs, WSBA #20795
Attorney for Plaintiff-Respondent
522 W. Riverside, Suite 560
Spokane, WA 99201
Tel: (509) 232-7760/ Fax: (509) 232-7762

CERTIFICATE OF SERVICE

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

I certify that on October 1, 2014, I caused a true and correct copy of Respondent's Brief in Opposition to petition for Review to be emailed (with agreement of counsel) and mailed via U.S. Postal service to Defendant-Appellant's attorney, William Spencer, at the following address, postage prepaid:

William Walter Spencer
Murray Dunham & Murray
P.O. Box 9844
Seattle, WA 98109-0844



Leslie Swift, Declarant

OFFICE RECEPTIONIST, CLERK

To: Leslie Swift
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Re: Cameron Jones, a single man, Plaintiff-Respondent v. Hapa United, LLC, a Washington Limited Liability Company, doing business as Wave Island Grill and Sushi Bar, Defendant-Petitioner; Supreme Court Case Number: 90703-0

Attached (in Word format and pdf) is Respondent's Brief in Opposition to Petition for Review, for filing by:

Breean L. Beggs, WSBA #20795
Telephone: 509-232-7760
Email: bbeggs@pt-law.com

Leslie Swift, Paralegal
Paukert & Troppmann PLLC
Tel: 509.232.7760 ext. 209
Email: lswift@pt-law.com
www.paukertlawgroup.com