Court of Appeal Case No. 73514-4-I

SC#93332-4

IN THE SUPREME COURT OF THE STATE OF WASHINGTON

JOSHUA J. WOOLCOTT, Petitioner/Appellant,

v.

CITY OF SEATTLE, Respondent.

PETITION FOR REVIEW

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A. IDENTITY OF PETITIONER

Joshua J. Woolcott asks this court to accept review of the Court of Appeals decision terminating review designated in Part B of this petition.

B. COURT OF APPEALS DECISION

Joshua J. Woolcott asks this court to review the Court of Appeals decision filed May 23, 2016. A copy of the decision is in the Appendix at pages A-1 through A-7.

C. ISSUES PRESENTED FOR REVIEW

If review is granted, Joshua J. Woolcott asks this court to decide whether the City of Seattle's duty or obligation to maintain the public right of way for ordinary travel extends to Joshua Woolcott, a pedestrian who broke his foot on a pothole one step off the curb and a couple of feet to the right of a painted crosswalk unilaterally designed by city ignoring anticipated special uses, but well to the left of the outside sidewalk curb lines extending through the intersection. In this case, the existence of the city's duty or obligation turns on whether such pedestrian's use was "ordinary travel" considering the totality of circumstances of how the intersection is used by pedestrians and whether such use was reasonably foreseeable by the city. The consideration of all these circumstances should be for the trier of fact to decide.

On April 8, 2011, Seattle Mariners Opening Day, Joshua J. Woolcott suffered a broken foot after he took one step off the curb to cross the street at the intersection of Royal Brougham Way and Fourth Avenue South, an intersection where heavy pedestrian and vehicle traffic that day were specially designated to be controlled and directed by the Seattle Police Department.

Woolcott presented evidence to the trial court that his use of the right of way was, at a minimum, reasonably foreseeable by the city and, therefore, an implied invitation based upon the totality of circumstances. Indeed, Woolcott presented evidence that his use of the right of way was expressly directed and allowed by the city's police officers in control of the intersection pursuant to a written plan. The city presented evidence that the place where Mr. Woolcott stepped and broke his foot was not a walking area constituting a reasonably anticipated and intended use of the public right of way. Since both parties presented competent evidence on the foreseeable use of the intersection giving rise to the existence of the city's duty or obligation, the issue must be determined by the trier of fact.

In sum, Mr. Woolcott respectfully request, if review is granted, that the Supreme Court review and decide the following issue:

> Was walking where Mr. Woolcott was injured a reasonably foreseeable and anticipated use constituting "ordinary travel" such that it imposes an obligation or duty on the city to design and maintain the right of way so that it is safe for pedestrians?

D. STATEMENT OF THE CASE

On Friday, April 8, 2011, Joshua Woolcott planned to attend the home opener for the Seattle Mariners' 2011 season. At about a quarter to 7 p.m., he walked with friends and other fans southbound on the east sidewalk of the northeast corner of the intersection of Royal Brougham Way and Fourth Avenue South. He was walking at a normal, steady pace in the middle of the sidewalk in a parallel path alongside the Pacific Office Automation building. As Mr. Woolcott approached the crosswalk area at the intersection, he saw a police officer standing near the middle of Royal Brougham Way to his left or the east side of the east crosswalk leg of the intersection. The officer was blocking westbound vehicle traffic while waving and directing Mr. Woolcott and other pedestrian traffic through the intersection.

As he approached the curb leading across the intersection, Mr. Woolcott was looking forward at the crossing signal across the street and at the traffic officer waving him through. His intended path from the middle of the sidewalk, parallel to the side of the building and parallel with Fourth Avenue South, was a line straight across from the northeast curb corner to a point directly across at the same spot on the southeast curb corner. He walked at a normal steady pace without slowing down or speeding up and, in one fluid motion, stepped off the curb with his right

foot forward. He had not noticed the pothole below the curb as he approached and his right foot caught the pothole on his first step off the curb.

The pothole Mr. Woolcott tripped on was not located on the painted crosswalk markings.

The pothole was located at the edge of a repaired utility strip running parallel to the west side of the painted crosswalk markings for the east leg of the intersection. Thus, as Mr. Woolcott was taking his first step off the curb, the pothole was located a couple of feet to the right of the painted crosswalk in the repaired utility strip, but well inside the edge of the outside sidewalk curb lines to the right. The repaired utility strip was there since 1994 or 1995. Indeed, the city readily identified for repair the pothole where Mr. Woolcott fell.

The city designed and painted the east crosswalk area with striping in 2005. The city has not produced an engineering study for the design and marking of the east crosswalk leg and cannot say what specific factors were actually considered in designing the striping plan used. In sum, specific factors to consider in exercising engineering judgment might include, for example, vehicle & pedestrian traffic counts, daily regular use of intersection by pedestrians, use of intersection on special event days (Mariners, Seahawks, Sounders, etc.), etc. In fact, in 2005 the city

designed the 14-foot striping width for this east crossing leg of the intersection based only on the ordinary daily use of the intersection; the city did not consider special uses of the intersection by heavier pedestrian traffic such as that on Mariners Opening Day 2011.

Although the city did not contemplate special uses of the intersection by heavy pedestrian traffic when it designed and marked the crosswalk, the city worked with the Mariners to develop a written special events traffic control plan for this intersection. Despite the written traffic control plan, the city allows the officers assigned to the intersection the discretion to alter the plan; directing and controlling pedestrian traffic as circumstances warrant to ensure their safety.

Notably, at least after Mariners games, the city allows all-ways crossing at this intersection, through the middle of the entire intersection, **including the area where Mr. Woolcott fell**.

E. ARGUMENT WHY REVIEW SHOULD BE ACCEPTED

1. A proper interpretation of common law and proper application to the developed record will clarify and establish a paramount issue of substantial interest; that is, the existence of a municipality's duty and obligation to keep its public right of ways reasonably safe for reasonably anticipated use by the traveling public.

Quite frankly, in our day to day lives, one cannot articulate many more substantial issues of public interest than the existence of a

municipality's duty and obligation to keep its public right of ways reasonably safe for reasonably anticipated use by the traveling public.

In the instant case, petitioner Joshua Woolcott respectfully contends that a proper interpretation and application of the common law, particularly *Berglund v. Spokane County*, 4 Wn.2d 309, 103 P.2d 355 (1940), in light of the factual record developed here, imposes a duty and obligation on the city to design and maintain the public right of way in a reasonably safe manner for foreseeable uses.

Petitioner submits that whether a duty exists turns on the issue of foreseeability and generally includes a determination of whether the incident that occurred was foreseeable. *Keller v. City of Spokane*, 146 Wn.2d 237, 243, 248, 44 P.3d 845 (2002) citing *Berglund*, 4 Wn.2d 309 at 313-15, 321.

Petitioner submits that the existence of the city's duty is established independent of the injured person's own negligence or fault, if any. *Keller* at pp. 243, 248-51, 254.

Petitioner submits that the court in *Berglund* noted that if a municipality in any manner extends an invitation to the public to walk on its improved right of ways, the city "must exercise reasonable care to keep them in a reasonably safe condition for travel" as "[i]t is the invitation,

expressly or impliedly extended to the public, that imposes the obligation." *Berglund* at p. 317 (citations omitted).

Even if the Supreme Court adopts the interpretation of common law as fashioned by the Court of Appeals, the application to the factual record developed here does not support the conclusion that no reasonable trier of fact could conclude that the city actually directed and allowed petitioner to use the public right of way as he did, which constitutes an express, if not implied, invitation to use the public right of way that was not unlawful.

At a minimum, on special event days such as Mariners games, the city impliedly – if not expressly – invited pedestrian traffic over the area where Mr. Woolcott fell. The city took direct and active control over the use of the intersection for all Mariners games. Notwithstanding the city's written plan to direct and control pedestrian traffic at this intersection for all Mariners games, the city's police officers were given authority and discretion as dictated under the circumstances to direct and control pedestrian traffic at this intersection to insure the safety of pedestrians. The city directed and allowed Mr. Woolcott to cross the intersection where he did.

Moreover, the city's admission that – at least after Mariners games – it directs and allows pedestrian traffic flow over this entire intersection, **including over the area where Mr. Woolcott fell**, is dispositive on the issue of whether the city owes a duty to Mr. Woolcott and others to keep the area safe for expected pedestrian travel. The use – walking over the area where Mr. Woolcott fell on Mariners game days – was not only reasonably anticipated or expected, but it was expressly allowed at the city's invitation and direction. Thus, since the city directed and allowed pedestrian traffic over the area where Mr. Woolcott fell, it owed a duty to design and maintain and repair that area for the safe travel of pedestrians. Obviously, if the hole had been repaired for the benefit of only pedestrians walking after the games, any pedestrians anticipated to walk over it before games would not have tripped.

Additionally, as noted, petitioner Mr. Woolcott contends that his use of the public right of way was not only foreseeable and invited, but that it was not unlawful.

Petitioner submits, as presented in the record on appeal, that painted crosswalk markings at signalized intersections provide "**guidance**" for pedestrians by delineating "approaches" to and within the intersection. Petitioner submits that the crosswalk markings designed and

applied by the city at a signalized intersection serve as a **guide** for centering pedestrian traffic in contrast to uniform code requirements that "[a]t **nonintersection** locations, crosswalk markings **legally establish** the crosswalk." Thus, because vehicle traffic is not being stopped as it is in a signal-controlled intersection, painted crosswalks at a midblock location, for example, serve as more than a guide to pedestrians. In the instant case, the crosswalk area is within the signal-controlled, police-controlled intersection.

Again, the issue of whether a duty is imposed upon the city turns on foreseeability and is established independent of Mr. Woolcott's own negligence or fault, if any. See *Keller* at pp. 243, 248-51, 254. Even if it were to be determined that Mr. Woolcott used the crosswalk area unlawfully, that does not mean the city owes no duty. See *Keller* at p. 248 citing *Berglund* at p. 320. Indeed, such determination as to the reasonableness of Mr. Woolcott's conduct goes to comparative fault and presents a question of fact as to whether he acted reasonably. See *Beireis v. Leslie*, 35 Wn.2d 554, 214 P.2d 194 (1950) where the court held in a pedestrian/motor vehicle collision case that it was a question of fact for the jury to determine whether or not a pedestrian, who went four or five feet beyond the **mid-block** marked crosswalk (not at a signal-controlled intersection crosswalk area), acted reasonably.

Although the totality of these circumstances are questions of fact for the jury to consider when determining whether there was a breach, petitioner submits that they do highlight the issue of whether the city is entitled to dodge its obligation to all pedestrians in an intersection containing a painted crosswalk by designing a narrow path that it should know cannot accommodate reasonably anticipated heavy pedestrian traffic.

Finally, petitioner submits that even if the law allowed for unlawful use of the public right of way to eliminate the city's duty, his use was not unlawful. Petitioner submits that the proper interpretation of the common law as applied to the record developed does not support a conclusion that he jaywalked or unlawfully crossed the intersection at a location where he was not directed to cross.

The city principally relies on two cases that are distinguishable. Unlike in *Hansen v. Washington Natural Gas and the City of Seattle*, 95 Wn.2d 773, 632 P.2d 504 (1989) and *McKee v. City of Edmonds*, 54 Wn.App. 265, 773 P.2d 434 (1989), Mr. Woolcott did not abandon the sidewalk in the middle of the block and cross the street. Here, Mr. Woolcott did not cross diagonally mid-block. He did not cross mid-block between two intersections with marked crosswalks. He did not trip on an

unsafe area located in the middle of the street. Mr. Woolcott took one step off the curb, in a direct line from the center of the sidewalk into the street, well within the curbline extension of the two opposing curb corners, on the inside of the crosswalk area abutting and parallel to the painted crosswalk marking. And, unlike in *Hansen* and *McKee*, police officers were present, directing and controlling pedestrian traffic, waving and allowing Mr. Woolcott to walk across in the path he took over the area where he fell.

F. CONCLUSION

This court should accept review of this case that establishes the duty owed by a municipality to insure the safety of public users of the right of way for the reasons indicated above, and the trial court order granting the City's motion for summary judgment should be reversed and this case remanded to the trial court for further proceedings.

As a matter of law, a duty of ordinary care is imposed on the city to make its public right of way reasonably safe for travel where Mr. Woolcott and other Mariners fans were anticipated, allowed and directed to travel. Even if the trier of fact were to determine that somehow Mr. Woolcott's use was negligent or unlawful, that does not abolish the duty owed by the city, but merely goes to the issue of comparative fault. Consequently, the trial court order granting the city's motion for summary

judgment dismissal brought on the basis that it owes no duty to Mr. Woolcott because he tripped on a hazard just outside a marked crosswalk designed by the city should be reversed, and this case should be submitted to arbitration/trier of fact for determination of responsibility and fair compensation for Mr. Woolcott's injury.

Dated this 21st day of June, 2016.

Respectfully submitted,

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APPENDIX

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Court of Appeals decision filed May 23, 2016.....A-1 to A-7

IN THE COURT OF APPEALS OF THE STATE OF WASHINGTON

JOSHUA J. WOOLCOTT,	)	No. 73514-4-I
Appellant,	)	DIVISION ONE
v.	)	
CITY OF SEATTLE,	)	UNPUBLISHED
Respondent.	)	FILED: May 23, 2016

Cox, J. — Joshua Woolcott appeals the summary judgment dismissal of his personal injury action against the City of Seattle. Because he fails to establish that the City owed him any duty, a necessary element of his claim, we affirm.

In the spring of 2011, Woolcott planned to attend the Seattle Mariners' opening home game. At about 7 p.m., he walked towards the stadium with friends on the sidewalk, approaching the intersection of South Royal Brougham Way and Fourth Avenue South.

A police officer at the middle of this intersection blocked westbound vehicle traffic while waving Woolcott and other pedestrians through. Woolcott stepped off the curb and into a pothole he had not noticed, breaking his foot. He admits this pothole "was not located on the painted crosswalk markings" at the

intersection.[1] Instead, this pothole was toward the middle of the intersection. Woolcott planned to walk "straight across from the northeast curb corner to a point directly across at the same spot on the southeast corner," a route parallel to the marked crosswalk.[2]

Woolcott commenced this action, claiming that the City failed to keep the intersection safe for ordinary travel. The City moved for summary judgment, arguing that Woolcott failed to establish that it had violated its duty of care. Specifically, it argued that, because Woolcott crossed outside of a marked crosswalk, it did not owe a duty to maintain that portion of the street safe for pedestrian travel. The court granted the motion for summary judgment, dismissing Woolcott's claims.

Woolcott appeals.

DUTY

Woolcott argues that the City owed a duty to keep the street area outside the marked crosswalk reasonably safe for pedestrian travel. We hold there is no such duty under the circumstances of this case.

Courts may grant summary judgment if there is no genuine issue as to any material fact and the moving party is entitled to judgment as a matter of law.[3] When ruling on summary judgment, the trial court considers the evidence in the

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[1] Brief of Appellant at 4.

[2] Clerk's Papers at 122.

[3] Wash. Fed. v. Harvey, 182 Wn.2d 335, 340, 340 P.3d 846 (2015) (quoting Lybbert v. Grant County, 141 Wn.2d 29, 34, 1 P.3d 1124 (2000)).

light most favorable to the nonmoving party.[4] We review de novo summary judgment, applying the same standards as the trial court.[5]

"In order to recover on a common law claim of negligence, a plaintiff 'must show (1) the existence of a duty to the plaintiff, (2) a breach of that duty, (3) a resulting injury, and (4) the breach as the proximate cause of the injury.'"[6]

Whether a municipality owes a duty in a particular situation is a question of law.[7] We review de novo questions of law.[8]

The sole issue before us is whether a duty existed. "It is well established that a municipality has the duty 'to maintain its roadways in a condition safe for ordinary travel.'"[9] We "must decide not only who owes the duty, but also to whom the duty is owed, and what is the nature of the duty owed."[10] "[T]he answer to the third question defines the standard of care."[11]

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[4] Young v. Key Pharm., Inc., 112 Wn.2d 216, 226, 770 P.2d 182 (1989).

[5] Wash. Fed., 182 Wn.2d at 339.

[6] Wuthrich v. King County, 185 Wn.2d 19, 25, 366 P.3d 926 (2016) (quoting Lowman v. Wilbur, 178 Wn.2d 165, 169, 309 P.3d 387 (2013)).

[7] Id.

[8] Lyons v. U.S. Bank Nat'l Ass'n, 181 Wn.2d 775, 783, 336 P.3d 1142 (2014).

[9] Wuthrich, 185 Wn.2d at 25 (quoting Owen v. Burlington N. Santa Fe R.R., 153 Wn.2d 780, 786-87, 108 P.3d 1220 (2005)).

[10] Keller v. City of Spokane, 146 Wn.2d 237, 243, 44 P.3d 845 (2002).

[11] Id.

Courts must consider the intended use of a street.[12] "[T]he law directs pedestrians to use marked crosswalks."[13] Thus, cities must ensure that crosswalks are safe for pedestrians.[14] In contrast, cities have no duty to ensure that pedestrians can safely cross the street where there is no crosswalk.[15]

RCW 46.04.160 defines a "crosswalk" as:

> the portion of the roadway between the intersection area and a prolongation or connection of the farthest sidewalk line or in the event there are no sidewalks then between the intersection area and a line ten feet therefrom, ***except as modified by a marked crosswalk.***[16]

This court considered the scope of the duty a municipality owed to a pedestrian in McKee v. City of Edmonds.[17] There, Mary McKee tripped while crossing a street in downtown Edmonds. Both ends of the block had marked crosswalks. She became distracted and attempted to cross the street mid-block. Just before reaching the center of the street, she tripped in a pothole, fracturing her leg. The marked crosswalks were unobstructed and properly maintained when she fell.

She sued the City for negligence, arguing that jaywalking was customary and foreseeable at the area of her fall. She admitted that she was jaywalking,

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[12] Xiao Ping Chen v. City of Seattle, 153 Wn. App. 890, 903, 223 P.3d 1230 (2009).

[13] Id. at 906.

[14] Id. at 907.

[15] Hansen v. Wash. Nat. Gas Co., 95 Wn.2d 773, 778, 632 P.2d 504 (1981).

[16] (Emphasis added.)

[17] 54 Wn. App. 265, 773 P.2d 434 (1989).

but, nevertheless, argued that the City owed her a duty. The superior court dismissed her action, and this court affirmed.

This court quoted the supreme court's opinion in Hansen v. Washington Natural Gas Co.[18] to address the scope of the municipality's duty:

> Plaintiff was jaywalking. In effect he selected and created his own crosswalk mid-block, and insists the city should have made it safe for him. To permit him to recover on the basis that the city was negligent would require us to hold that the city must maintain the full block of a street safe for pedestrian cross travel when the sidewalk, or even a portion thereof, is blocked. This we will not do. At the maximum, plaintiff would have [had] to walk no more than one-half block to reach a crosswalk.[19]

Here, there is no evidence that the marked crosswalk was blocked, full, or otherwise unusable. Nevertheless, Woolcott chose to step into the street outside the marked crosswalk. There simply is no duty the City owed him to make this area safe for his travel.

This court specifically rejected the argument in McKee that foreseeability created a duty. We do the same here, for the same reasons.

Woolcott argues that the marked crosswalk serves merely as a guide for pedestrian traffic and does not determine the scope of the duty owed. We disagree.

Under RCW 46.04.160, the crosswalk markings established the crosswalk at this intersection. Thus, the markings were not merely a guide for pedestrians.

Additionally, both Hansen and McKee stand for the principle that the scope of the duty owed under the circumstances here is defined by the

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[18] 95 Wn.2d 773, 632 P.2d 504 (1981).

[19] McKee, 54 Wn. App. at 267.

availability of unobstructed, marked crosswalks. Woolcott fails to cite any persuasive authority to the contrary.

Woolcott argues that the police officer directed him to cross the intersection as he did. The record does not support this argument.

Woolcott testified by declaration that he entered the intersection when an officer directing traffic waved pedestrians into the intersection. But nothing in Woolcott's declaration, or anywhere else in the record, indicates that the officer directed Woolcott to cross outside of the marked crosswalk.

The record shows that officers directing traffic after Mariners games, when pedestrian traffic is heavy, sometimes allow pedestrians to cross "all ways" or diagonally at the intersection. But nothing in the record establishes that officers were doing so before the Mariners game when Woolcott crossed the intersection. Accordingly, this argument is unpersuasive.

Woolcott also argues that, under Berglund v. Spokane County,[20] foreseeability determines the City's duty. We disagree.

In that case, Spokane County built a bridge for both pedestrian and automobile traffic.[21] The plaintiff was injured when a car struck her as she crossed the bridge.[22] The supreme court determined that the county had a duty to make the bridge reasonably safe for pedestrians.[23] But this duty did not arise

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[20] 4 Wn.2d 309, 103 P.2d 355 (1940).

[21] Id. at 311.

[22] Id. at 312.

[23] Id. at 317.

merely because it was foreseeable that pedestrians would use the bridge. Rather, the duty arose because the county invited pedestrians to use the bridge. The supreme court noted, "It is the invitation, expressly or impliedly extended to the public, that imposes the obligation."[24]

Here, as explained earlier, Woolcott fails to establish that the City invited him to cross the intersection outside of the marked crosswalk. Accordingly, under Berglund, the City did not owe a duty to make that part of the intersection safe for pedestrians.

Finally, Woolcott argues that his use of the street was not unlawful. Thus, he contends his use goes to the issue of contributory negligence, not duty. We disagree.

In this case, the City's duty turns on whether it invited Woolcott to cross where he did. Accordingly, whether Woolcott crossed in the marked crosswalk goes to the City's duty. Whether it may also go to Woolcott's contributory negligence is irrelevant. Thus, this argument is unpersuasive.

We affirm the summary judgment order.

Cox, J.

WE CONCUR:

Dwyer, J.

Becker, J.

[24] Id.

Court of Appeal Case No. 73514-4-I

IN THE SUPREME COURT OF THE STATE OF WASHINGTON

JOSHUA J. WOOLCOTT, Petitioner/Appellant, vs. CITY OF SEATTLE, Respondent.	CERTIFICATE/PROOF OF SERVICE RE: PETITION FOR REVIEW

I, Anthony C. Johnson, attorney for Petitioner/Appellant Joshua J. Woolcott, certify that on the 21st day of June, 2016, I caused a true and correct copy of

(1) PETITION FOR REVIEW

to be served on the Respondent's attorney at the address and in the following manner indicated below:

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