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Supreme Court No. 93884-9
Court of Appeals No. 72869-5

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THE COURT OF APPEALS OF THE
STATE OF WASHINGTON DIVISION 1

DONALD CANFIELD,

Appellant,

v.

MICHELLE CLARK,

Respondent.

RESPONDENT'S ANSWER TO PETITION FOR REVIEW

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I. IDENTITY OF PARTIES

Michelle Clark (“Clark” or “Respondent”) responds to Petitioner Donald Canfield’s (“Canfield” or “Petitioner”) Petition for Review.

II. CITATION TO THE COURT OF APPEALS DECISION

Canfield v. Clark, No. 72869-5-1 (August 22, 2016) (Appendix A) Publication Ordered on October 17, 2016, official citation not yet available.

III. INTRODUCTION

Petitioner’s request for review, though including a lengthy superfluous and largely irrelevant Statement of the Case seems to involve two issues: (1) Whether the Court of Appeals erred in affirming that the jury instructions and verdict form correctly formulated the law and allowed the jury to apply the law to the facts of the case; and (2) whether the Court of Appeals erred in affirming that the jury was not required to find Ms. Clark damaged Mr. Canfield.

Mr. Canfield’s central argument in the petition for review, as set forth in his Issue Statement, is that because carrying a gun on school property is a violation of the law the jury was required to find Ms. Clark’s statements were defamation per se and further was required to award Mr. Canfield money. Petitioner goes on to argue that because no monetary

damages were awarded, the jury instructions and verdict form must have been confusing or erroneously formatted.

The standard of review is whether the jury instructions and verdict form were correctly formulated to allow the jury to apply the law to the facts of the case. *See Caruso v. Local Union No. 690*, 107 Wn.2d 524, 529, 730 P.2d 1299, *cert. denied*, 484 U.S. 815 (1987).

As was recognized by the Appellate Court, Mr. Canfield did not argue in his Appeal or in the present petition that a version of the jury instructions and verdict form that he proposed would have resolved his alleged issue. Appendix A, pg. 9. Regardless, Mr. Canfield's argument does not comport with the law or evidence.

The Court of Appeals correctly affirmed the jury verdict and decisions of the trial court. The Appellate Court considered Mr. Canfield's arguments and found that, "the jury was not obliged to find defamation per se", and that "question three on the verdict form did not misstate the law, it was not misleading, and it did not prevent the jury from considering Canfield's theory of defamation per se." Appendix A, pg. 9, 12.

As determined by the Court of Appeals, jury instruction no. 9 properly informed the jury that a plaintiff who proves defamation per se does not need to prove "actual damages". However, as the Appellate

Court stated, “reasonable jurors could have adopted Clark’s view of the evidence”. Appendix A, pg. 11.

Review should be denied because the Court of Appeals applied settled principles of defamation law to affirm the jury verdict and decisions of the trial court. The Appellate Court decision does not conflict with other decisions or depart from settled case law. The jury instructions and jury verdict form were properly formatted to allow the parties to argue their theories of the case and allow the jury to apply the law to the facts of the case.

In light of all of the evidence in this matter the jury simply did not find that Ms. Clark’s statements, though defamatory, caused any damage to Mr. Canfield. As was stated by the Appellate Court, “The jury knew from instruction 9, the instruction on defamation per se, that Canfield was not required to prove actual damages if the communication was defamatory per se.” Appendix A, pg. 9. “The jury may have found that Clark’s statement, while defamatory, did not have the effect of exposing him to ridicule, depriving him of public confidence, or injuring him in his job and therefore did not cause him any damage.” *Id.* Petitioner’s request for review should be denied.

IV. ISSUE PRESENTED FOR REVIEW

Whether the Court should deny review of the Court of Appeals decision because the Court of Appeals decision aligns with established case law regarding defamation and defamation per se. The jury instructions and jury verdict form were properly formatted to allow the parties to argue their theories of the case and allow the jury to apply the law to the facts of the case and thus the Appellate Court decision should not be reviewed. Pursuant to RAP 13.4(b) there are no appropriate grounds for review of the Appellate Court decision and thus Mr. Canfield's Petition should be denied.

V. STATEMENT OF THE CASE

A. Procedural Background

Mr. Canfield initially filed this lawsuit against his former co-worker in the Electrical Department at Seattle Public Schools, Michelle Clark, alleging defamation and negligent infliction of emotional distress in December 2009. CP 1-5. Mr. Canfield filed a lawsuit against their employer, Seattle Public Schools as well in July 2010 and the cases were consolidated. *See Canfield v. Clark, et al.*, No. 67274-6-I (May 28, 2013), a copy of which is attached as Appendix B at pg. 3.¹ The trial court

¹ As this opinion represents the law of the case, citation to it is not prohibited by GR 14.1.

granted summary judgment dismissing the claims against Ms. Clark on April 19, 2011. *Id.* In July 2011, a jury trial of Mr. Canfield's claims against the District was held. *Id.* Ultimately the trial court granted the District's motion for judgment as a matter of law notwithstanding the jury verdict dismissing Mr. Canfield's claims against the District as well. *Id.*

Mr. Canfield appealed the trial court's dismissal of his claims against the District following trial and its earlier dismissal of his claims against Michelle Clark on summary judgment. *Id.* The Appellate Court upheld the trial court as to the claims against the District but reversed the original summary judgment in Ms. Clark's favor on Mr. Canfield's defamation claims because of a letter written in 2008 by someone named Jessie Logan. *See Id.* at 5-6. The Court of Appeals viewing this evidence in the light most favorable to Mr. Canfield found that the letter created issues of fact as to the defamation claim and remanded back to the Superior Court. *Id.*

A jury trial of Mr. Canfield's claims against Ms. Clark took place from October 27, 2014 through November 5, 2014. At trial Mr. Canfield claimed that he was damaged as a result of two statements made by Ms. Clark, to two individuals, Ms. Jeanette Bliss (former human resources representative) and Mr. Akira "Auki" Piffath (a co-worker and Ms. Clark's carpool friend). *See* RP 367-374, 580-583. The alleged

statements included or implied that Mr. Canfield may have had a gun on school district property. *Id.*

Jessie Logan was never deposed; she had never been put under oath. She did not testify at trial. Without the testimony of Ms. Logan, Mr. Canfield had little persuasive evidence to present to the jury in support of his defamation claims.

The jury heard the evidence and concluded that while defamatory statements were made, Mr. Canfield suffered no injury or damage as a result of Ms. Clark's statements. CP 1637-1638. As was affirmed by the Court of Appeals, the jury was presented with ample evidence from which it could reach this conclusion over the course of the trial.

Mr. Canfield appealed several evidentiary decisions of the trial court as well as the adoption of the Special Verdict Form. Mr. Canfield argued that the Verdict Form was erroneous and did not give the jury the opportunity to find defamation per se. The Appellate Court correctly affirmed the decisions of the trial court including that the jury instructions and verdict form in conjunction with Petitioner's closing argument gave the jury ample opportunity to consider defamation per se. Appendix A, pg. 9, 12. The Appellate Court recognized that Mr. Canfield's counsel argued in closing and again in rebuttal, "if we show defamatory per se, you can presume damages." RP 1207. The jury was simply not

convinced that the statements injured Mr. Canfield in his business, trade or profession; they did not believe the statements subjected him to the kind of ridicule or contempt required for defamation per se. In fact, they did not find that Ms. Clark's statements damaged Mr. Canfield at all.

The Appellate Court appropriately confirmed that the jury instructions read in conjunction with the special verdict form allowed Mr. Canfield to argue his theory of the case fully and completely to the jury. He simply did not have the evidence to support his theory of defamation per se. Ms. Clark presented evidence to convince the jury to reject Mr. Canfield's claim of damages.

The Appellate Court relied on settled case law in making its decisions. This court should deny Mr. Canfield's petition for review and finally put an end to this litigation.

B. Evidence at Trial.

Mr. Canfield's statement of the case is distorted and inaccurate. Mr. Canfield opens his brief with a lengthy irrelevant and unsubstantiated "history".

Mr. Canfield's version of the facts projects Mr. Canfield as a champion for his co-workers attempting to procure appropriate wages and allegedly missing safety equipment. In addition to being largely irrelevant, Mr. Canfield's version of the facts does not comport with the

actual evidence at trial. The evidence the jury actually heard is that Mr. Canfield, a long time Seattle Public Schools employee, in the Electrical Department, had conflicts with no less than six of his co-workers and seemingly every manager he dealt with at Seattle Public Schools. A significant portion of Mr. Canfield's factual statement requires no response because it either supports Ms. Clark's position or is irrelevant.

At trial there was minimal evidence of any defamatory statements. While there was significant evidence of Mr. Canfield being involved in conflicts with several of his co-workers as well as Seattle Public Schools' management.

As was detailed in Ms. Clark's Response to Mr. Canfield's Appeal, conflict marred Mr. Canfield's tenure as an electrician with the District, in particular his time with authority as a foreman over his fellow electricians. Mr. Canfield started work with the District in 1992 and became a foreman in 2001. RP 163. Mr. Canfield became a foreman after his supervisor Nam Chan quit in response to a conflict with Mr. Canfield. RP 165.

Once Mr. Canfield became a foreman, the conflicts escalated. Mr. Canfield had numerous conflicts with the District. RP 189-199. He had conflicts with Jeff Hillard, Nam Chan, Mark Johnson and Bill Wickersham, all before Ms. Clark started at the District. RP 301-303. He later had conflicts with Dan Bryant and Mike Jackson. RP 342-345.

When he became aware in 2006 that his supervisees were complaining about him, *see*, RP 213-214, Mr. Canfield began filing notifications of performance concerns regarding Jeff Hillard, Bill Wickersham and Nam Chan. RP 232-234.

In September 2006, before Ms. Clark started at the District, the District met with several electricians, two of Mr. Canfield's supervisors, and a union business representative, to discuss complaints about Mr. Canfield's interactions and management style as the foreman over other electricians, concluding that he needed help with his management style. RP 235-236; RP 305-306.

Mr. Canfield could offer almost no evidence of how he was damaged by Ms. Clark's statements to two people, Auki Piffath and Jeanette Bliss, particularly in light of Mr. Canfield's serious unrelated issues with his co-workers and District management. Mr. Canfield testified extensively in direct examination about conflicts with District management including his wage and safety allegations. RP 189-192.

Similar to the Statement of the Case in Mr. Canfield's Petition, Mr. Canfield actually testified that the District's action in keeping him on leave, their "discipline" of him, was motivated by his advocating prevailing wages and other changes for the electrical department workers;

not that it was due to Ms. Clark's complaints. RP 282-283; *See also* Petition for Review at pg. 5.

Multiple current and former District employees testified at trial and the overwhelming evidence was that Mr. Canfield's reputation was poor at all times before and after Ms. Clark's statements. *See* RP 506-507, 721, 726-732, 801, 816, 835, 976, 988, 1028-1031. Furthermore, Mr. Canfield's witnesses actually confirmed that Mr. Canfield was perpetuating whatever statements Ms. Clark made by repeatedly bringing up the subject himself. *See*, RP 719; RP 732. Consequently the evidence did not indicate that Ms. Clark was responsible for any "gun rumors" involving Mr. Canfield.

Further, Mr. Lynn Good, a former District employee also rebutted Mr. Canfield's testimony that he was placed on administrative leave from the District offices in a manner that caused Mr. Canfield public humiliation. Mr. Good handled the event, and he testified that it was done without any commotion and without anyone taking notice. *See*, RP 985-986. His testimony in this respect agreed with the testimony of Ms. Bliss. RP 453-454.

VI. THE COURT OF APPEALS DECISION

Mr. Canfield's request for review is based on the premise that the Court of Appeals improperly applied case law and held that the jury was

not required to find damages in a clear defamation per se case. Presumably Mr. Canfield is arguing, similar to in his Appeal, that despite having a jury instruction regarding defamation per se, and arguing repeatedly about defamation per se in closing, the jury instructions and jury verdict form did not allow the jury to consider defamation per se. Mr. Canfield argues that Ms. Clark's statements were defamatory per se and no reasonable juror could find otherwise – given different instructions.

As the Court of Appeals summarized the argument:

According to Canfield, the defamatory statement that he carried a gun on school grounds was necessarily defamatory per se because that conduct is criminal. Yet the jury failed to assess any damages at all, and in Canfield's opinion that failure must have occurred because of the wording of question 3 [of the special verdict form]. Appendix A, pg. 8.

The Court of Appeals considered Mr. Canfield's argument and appropriately disagreed holding:

We disagree. The jury was not obliged to find defamation per se. Instruction 9 required Canfield to prove that a defamatory statement exposed him to a set of circumstances from which damages may be presumed: "A defamatory statement is defamatory per se if it exposes person to hatred, contempt, ridicule or obloquy, to deprive him of the benefit of public confidence or social intercourse, or injures him in his business, trade, profession or office." The jury may have found that Clark's statement, while defamatory, did not have the effect of exposing him to ridicule, depriving him of public confidence, or injuring him in his job and therefore did not cause him any damage.

If the jury did find that Clark's statement about the gun was defamatory per se, question 3 did not force the jury to find actual

damages. The jury knew from instruction 9, the instruction on defamation per se, that Canfield was not required to prove actual damages if the communication was defamatory per se. When read as a whole the instructions, the special verdict form properly informed the jury of the applicable law.
Appendix A, pg. 9.

At trial, the parties engaged in significant oral argument regarding the jury instructions as well as the format of the special verdict form. Petitioner's proposed jury instruction regarding defamation per se is similar to the instruction ultimately adopted by the trial court. Petitioner's proposed the following instruction:

Generally, a plaintiff may recover only the actual damage caused by defamation. However, plaintiff is not required to prove actual damages if a communication injures the plaintiff in his profession or is such that it holds the plaintiff up to contempt, hatred or ridicule and the defendant knew the communication was false or acted with reckless disregard for the truth or falsity of the communication. If you find plaintiff was not required to prove actual damages you may presume plaintiff was damaged. CP 979.

Ultimately, the trial court included jury instruction no. 9 regarding defamation per se:

Generally, a plaintiff may recover only the actual damages caused by defamation. However, a plaintiff is not required to prove actual damages if a communication is "defamatory per se." A defamatory statement is defamatory per se if it exposes a person to hatred, contempt, ridicule or obloquy, to deprive him of the benefit of public confidence or social intercourse, or injures him in his business, trade, profession or office. RP 1108-1110.

Both instructions inform the jury that the plaintiff is not required to prove "actual damages" if he proves defamation per se. The trial court further

held that the parties could argue the details and meaning of the defamation per se instruction in closing. RP 1112.

The Appellate Court cited to *State v. Fehr*, 185 Wn. App. 505, 514, 341 P.3d 363 (2015) in reviewing the trial court decisions regarding the jury instructions and special verdict form and held, “We review a trial court’s decision regarding a special verdict form under the same standard we apply to decisions regarding jury instructions.” Appendix A, pg. 7. The Appellate Court further held, “Jury instructions are not erroneous if they permit each party to argue their theory of the case, are not misleading, and when read as a whole, properly inform the trier of fact of the applicable law.” *Id.* at 7-8.

As was recognized by the Appellate Court, utilizing the court’s instructions, each party did argue its position on defamation per se in closing. Counsel for Mr. Canfield argued to the jury that if they found defamation per se they could presume damages exist:

You can presume damages. And what you do is you presume damages that would naturally flow from that type of statement. So you need to keep this in mind when you’re determining the damage portion as well. They still need to be damages that would be proximately caused by the statement, but you can presume they exist. It’s a form of what they call strict liability. RP 1167.

Ultimately the Appellate Court appropriately, and in accordance with settled case law, held: “In summary, question

three on the verdict form did not misstate the law, it was not misleading, and it did not prevent the jury from considering Canfield's theory of defamation per se." Appendix A at pg. 12.

VII. ARGUMENT

The Court of Appeals affirmed the decisions of the trial court appealed by Mr. Canfield including introduction of certain evidence and the adoption of the jury instructions and the jury verdict form. The Appellate Court did so in compliance with settled Washington case law. Further, there is no constitutional issue or conflict of substantial public interest. There is no applicable reason for review pursuant to RAP 13.4(b) and thus Mr. Canfield's Petition should be denied.

A. The Court of Appeals' Decision Aligns With Settled Washington Case Law Regarding the Elements of Defamation Per Se.

Mr. Canfield's Petition for Review specifies the issue for review as relating to the concept that because Ms. Clark's statements implied that he had or may have had a gun on school property, which is a violation of the law, the statements were automatically defamation per se. Mr. Canfield implies that the Appellate Court's finding that the jury instructions and verdict form were appropriate and the jury verdict was supported by the evidence conflict with settled case law, which is not the case.

Settled Washington case law asserts that defamation per se exists where a statement alleges that the plaintiff: (1) committed a serious crime; (2) has a loathsome disease; (3) is unchaste; or (4) the statement injures the plaintiff in his business, trade, profession, or office. *See Davis v. Fred's Appliance, Inc.*, 171 Wn. App. 348, 287 P.3d 51 (2012).

The Appellate Court considered, and agreed with Ms. Clark, that the jury instructions, in particular Instruction No. 9, the Jury Verdict Form, and the argument of the parties accurately stated this rule.

As the Appellate Court noted, under Instruction 9, the jury could have found that Clark's statements were defamatory per se, but the jury was not obligated to make that finding. Reasonable jurors could have adopted Clark's view of the evidence. Appendix A, pg. 11. Here the jury did just that and found that Mr. Canfield was not damaged by Ms. Clark at all, let alone subject to "hatred or ridicule" as a result of her statements to two individuals, Ms. Bliss and Mr. Piffath.

B. The Evidence Did Not Require a Finding of Defamation Per Se as a Matter of Law.

Petitioner relies on cases that have held, "The imputation of a criminal offense involving moral turpitude has been held to be clearly libelous per se." *Caruso v. Local Union No. 690 of Intern. Broth. Of Teamsters, et al.*, 100 Wn.2d 343, 354, 670 P.2d 240 (1983). Mr. Canfield

argues that Ms. Clark's statements were defamatory per se and no reasonable juror could find otherwise. Mr. Canfield argues in essence that the issue should have been decided as a matter of law. But there was no evidence at trial that Ms. Clark made untrue statements that Mr. Canfield committed some crime of moral turpitude. As set forth in *Caruso v. Local Union No. 690 of Intern. Broth. Of Teamsters, et al.*, 100 Wn.2d 343, 354, 670 P.2d 240 (1983) cited in Mr. Canfield's petition, "In all but extreme causes" the jury should decide what is libelous per se. The jury was appropriately given that opportunity in this matter and decided that Ms. Clark's statements were not libelous per se.

The statements under consideration as defamation per se in *Maison de France, Ltd. v. Mais Oui!, Inc.*, 126 Wn. App. 34, 44-45, 108 P.3d 787 (2005), are far different from the "statements" in this case.

In *Maison de France*, one letter, the "September letter", was found to be defamatory per se because it falsely imputed criminal conduct to the appellants. 126 Wn. App. at 47. The letter specifically stated that the appellants were the "object of an investigation by United States Customs, the FDA and the Seattle Police for multiple counts of fraud," where at most the evidence supported an inference that they were investigated once. *Id.* The Court of Appeals reversed a contrary finding of fact by the trial

court and found that this specific statement in the letter constituted defamation per se. 126 Wn. App. at 54.

An April letter, however, did not specifically allege fraud. The Court of Appeals affirmed the trial court's finding of fact that it did not amount to defamation per se and did not support a claim for defamation at all:

The record does not support a finding that the April 22nd letter exposed the appellants to hatred, contempt, ridicule or obloquy, deprived them of the benefit of public confidence or social intercourse, or injured them in their business, trade, profession or office. *Caruso*, 100 Wn.2d at 353, 670 P.2d 240. The record supports the trial court's conclusion that Mais Oui! sustained no actual damages as a result of the April 22nd letter. *Maison de France*, 126 Wn. App. at 52.

Maison de France cites with approval *Caruso v. Local Union No. 690 of Int'l Brotherhood of Teamsters*, 100 Wn.2d 343, 353, 670 P.2d 240 (1983). The *Caruso* court made an important distinction applicable to this case:

The imputation of a criminal offense involving moral turpitude has been held to be clearly libelous per se. The instant case is quite different. It deals with rather vague areas of public confidence, injury to business, etc.

* * *

In all but extreme cases, the jury should determine whether the article was libelous per se.

Caruso, 100 Wn.2d at 354.

The Court of Appeals did not depart from *Caruso* and *Maison de France* in its decision in the present case. The Court of Appeals

appropriately confirmed that this is not the “extreme case” mentioned in *Caruso*.

Mr. Canfield points to no statements by Ms. Clark that specifically and falsely accuse Mr. Canfield of committing a crime of moral turpitude, such as the investigation of fraud in *Maison de France*. He relies on innuendo and suggestion. The statements to Mr. Piffath and Ms. Bliss barely rise to the level of false statements at all let alone Ms. Clark publicly accusing Mr. Canfield of a crime “involving moral turpitude”. See, RP 370-373, 404-408, 580-584.

There is no case law that states that an implication someone may have had a gun on school grounds is an *accusation of a crime of moral turpitude* or that the statements made by Clark in private to two individuals constituted an “extreme” situation contemplated by *Caruso*. The Appellate Court considered Mr. Canfield’s argument that because the alleged defamatory statements implied that he carried a gun on school grounds they were necessarily defamatory per se and disagreed. The Appellate Court’s decision in this regard is not in conflict with any prior case law and merely upholds the jury verdict.

C. The Appellate Court Affirmation of the Jury Verdict and Trial Court Holdings Should Not Be Disturbed.

The Appellate Court further considered whether the jury had the opportunity to consider whether the statements by Ms. Clark were so extreme as to constitute defamation per se and appropriately found that it did. Instruction number nine correctly stated:

A defamatory statement is defamatory per se if it exposes a person to hatred, contempt, ridicule or obloquy, to deprive him of the benefit of public confidence or social intercourse, or injures him in his business, trade or profession. RP 1108-1110.

Furthermore, Mr. Canfield had ample opportunity, which he took advantage of, to argue his theory of the case including regarding defamation per se. In closing Mr. Canfield's counsel argued:

I want to talk to you about defamation per se as well, and that's at Instruction No. 9. Because this relates to damages. So in this case, defamation per se is a principle that says that if somebody says something within -- that covers a particular context, something that tends to harm somebody in their business, for example -- that's what applies in this case most directly -- then you can automatically -- we don't have to prove actual damages. **You can presume damages.** ... It applies because statements such as the defamatory statements made by Ms. Clark are statements such that they cause particular harm to a party. So in this case, a defamatory statement is defamatory per se if it exposes a person to hatred, contempt, ridicule or -- I can't say that word -- to deprive him of the benefit of public confidence or social intercourse or injures him in his business, trade, or profession. **I don't believe that there is any doubt that a statement that an employee has a gun on them at a school district would injure them in their business.** So I believe both of the statements made clearly fall under defamation per se, and that's the way that you should treat the evidence in this case. RP 1167-1168.

In closing Mr. Canfield again argued:

You don't raise a gun allegation against somebody at work in a school district and not know that something bad is going to happen to them. ... And if we show defamatory per se, you can presume damages. RP 1207.

However, substantial evidence was presented from which the jury concluded that Mr. Canfield was not subjected to "hatred, contempt or ridicule" as the result of Ms. Clark's statements. The jury simply did not find that the statements made by Ms. Clark were so extreme as to constitute defamation per se. In fact, in light of all of the evidence, the jury found that the statements did not damage Mr. Canfield at all.

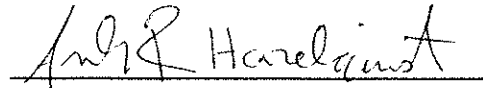
The Appellate Court appropriately held that the jury was within its province to find that Mr. Canfield was not damaged by Ms. Clark. When the jury did not award damages, it made a finding consistent with no finding of defamation per se. From the totality of the record, the Appellate Court appropriately determined that it could not say that no rational trier of fact could have reached that conclusion.

VIII. CONCLUSION

Mr. Canfield has not presented any sound reason why the Court should grant his request for discretionary review. This Court only accepts review in limited circumstances set forth in RAP 13.4(b). Petitioner has not actually described how any of those circumstances apply to his Petition. At best Petitioner argues that the Court of Appeals is in conflict with a published decision of the Court of Appeals. However, as set forth in Ms. Clark's Answer, this is simply not the case. Mr. Canfield's Petition for Review should be denied.

Respectfully submitted on this 15th day of December, 2016.

PREG O'DONNELL & GILLETT PLLC

A handwritten signature in black ink, appearing to read "Amber R. Hazelquist". The signature is written in a cursive style and is positioned above a horizontal line.

Mark F. O'Donnell, WSBA #13606

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Attorneys for Respondent Michelle Clark

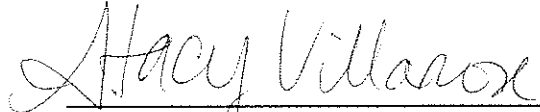
DECLARATION OF SERVICE

The undersigned declares under penalty of perjury under the laws of the State of Washington that on this day the undersigned caused to be served in the manner indicated below a copy of the foregoing document directed to the following individuals:

Counsel for Plaintiffs:

Chellie Hammack, Esq.
CM Hammack Law Firm
801 Second Avenue, Suite 1410
Seattle, WA 98154
Via Messenger

DATED at Seattle, Washington, this 15th day of December, 2016.



Stacy Villarose