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STATE OF WASHINGTON
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NO. 95285-0

THE SUPREME COURT OF THE STATE OF WASHINGTON

ALLA KOVAL,

Petitioner,

v.

AUBURN REGIONAL MEDICAL CENTER, INC.,

Respondent,

RESPONDENT AUBURN REGIONAL MEDICAL CENTER'S ANSWER TO PETITION FOR REVIEW TO THE SUPREME COURT

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I. INTRODUCTION

The Petition for Review seeks to manufacture the appearance of error where there is none. The Petitioner myopically cites to only a single sentence of a single jury instruction to argue that the Superior Court abused its discretion in giving Jury Instruction No. 10, and to errantly criticize the Court of Appeals for upholding the jury verdict.

This appeal involves a clear cut factual case that had been resolved the same way by the Department of Labor and Industries, the Board of Industrial Insurance Appeals, a Superior Court Jury, and then the Court of Appeals. Jury Instruction No. 10, when read as a whole, is an accurate statement of the law. Indeed, when read in context of the other jury instructions given, the Petitioner's claim of prejudice is untenable.

II. IDENTITY OF RESPONDENT

Auburn Regional Medical Center, Inc. ("Auburn Regional"), Respondent, asks this Court to deny review of the decision designated in Part III of this Answer.

III. DECISION

On November 6, 2017, the Division I Court of Appeals filed its unpublished opinion under No. 74664-2-I. The Court of Appeals affirmed the trial court's verdict in favor of Auburn Regional Medical Center, holding "the trial court's jury instruction correctly instructed the jury about

Koval's damages attributable to the natural progression of her preexisting condition and Koval was not prejudiced by the trial court's exclusion of the challenged testimony." *Koval v. Auburn Reg'l Med. Ctr.*, No. 74664-2-I (Wash. Ct. App. Nov. 6, 2017)(slip op.) at 1.

IV. ISSUES PRESENTED FOR REVIEW

1. Under the "multiple proximate causation" rule, was Jury Instruction No. 10 an accurate statement of the law when read as a whole and in context of the other jury instructions given?

2. Whether the Petitioner failed to state a basis for Review by the Supreme Court when Jury Instruction No. 10 and the Court of Appeals' opinion were consistent with Supreme Court and Court of Appeals precedent.

3. Whether the jury instructions given at trial were "sufficient" when 1.) the jury instructions permitted the Petitioner to argue her theory of the case by giving Jury Instruction No. 8 and No. 10; 2.) the jury instructions were clear and not misleading; and 3.) when read as a whole, the jury instructions properly informed the jury of the applicable law regarding the multiple proximate causation rule and preexistent symptomatic conditions.

4. Under RAP 10.3(a)(5), is the Petitioner's Statement of the Case improper when it 1.) attempts to reargue the merits of the expert testimony given in this case, and 2.) the expert testimony and findings of fact are not at issue in, or relevant to, this Petition?

V. COUNTER-STATEMENT OF THE CASE

A. Claim No. SE-27848

The Petitioner sustained a sprain to her right knee on January 1, 2010, in the course of her employment. The Petitioner filed a workers' compensation claim that was allowed as a temporary aggravation of her

preexisting severe osteoarthritis, then closed on May 27, 2010. On July 11, 2013, the Petitioner filed a reopening application with the Department of Labor & Industries ("Department").

On July 11, 2013 the Department issued an order that denied the reopening application on the basis that there was no objective evidence of a worsening of her condition between May 27, 2011 and July 11, 2013. The Petitioner appealed to the Board of Industrial Insurance Appeals ("Board"). The issue before the Board was whether or not the Petitioner's right knee condition was aggravated between May 27, 2010 and July 11, 2013 based, in part, upon objective medical evidence.

The Board's Proposed Decision and Order ("PD&O") found that the Petitioner had "severe" preexisting osteoarthritis in her right knee that was temporarily aggravated by the January 1, 2010 industrial injury. The Board also found that the industrial injury had not caused a progression of the Petitioner's severe preexisting right knee osteoarthritis. The PD&O found that on May 27, 2010, there were no objective medical findings related to the industrial injury, nor were there objective findings on July 11, 2013. Lastly, the Board also found and concluded that there was no objective worsening of the Petitioner's preexisting condition between May 27, 2010 and July 11, 2013, due to her industrial injury. The PD&O affirmed the

July 11, 2013 Department Order denying the Petitioner's reopening application.

The Board denied the Petitioner's petition for review, adopting the PD&O issued on July 25, 2014 as the final Decision of the Board.

B. Claim No. SE-27986

On September 21, 2011, the Petitioner sustained a sprain of her right knee that was deemed to be an industrial injury by the Department. On December 7, 2012, the Department issued an Order closing the Petitioner's claim with no award for permanent partial disability. The Claimant appealed the Department closing order to the Board.

The Petitioner presented three issues upon her appeal to the Board: whether the Petitioner's industrial injury was fixed and stable as of December 7, 2012; whether the Petitioner was temporarily totally disabled as a result of her industrial injury between March 23, 2012 and December 7, 2012; and whether the Petitioner was permanently partially disabled as of December 7, 2012.

The Board's PD&O found that the Petitioner had a "pre-existing, severe right knee osteoarthritis" that was temporarily aggravated by the September 21, 2011 industrial injury. The Board also found that this industrial injury did not contribute to the progression of the Petitioner's preexisting condition, that the Petitioner's industrial injury did not need

further proper and necessary treatment as of December 7, 2012, that the Petitioner was diagnosed with moderately severe right knee osteoarthritis that necessitated her use of a cane. Additionally, the Board found that between March 23, 2012 and December 7, 2012, the Petitioner had no physical limitations proximately caused by her industrial injuries of September 21, 2011 or January 1, 2010; and was able to work as a medical assistant or phlebotomist between those dates. Lastly, the Board found that the Petitioner was able to perform and obtain gainful employment between March 23, 2012 and December 7, 2012.

The PD&O, further, held that the Petitioner was not entitled to any further "proper and necessary treatment," and was not temporarily totally disabled between March 23, 2012 and December 7, 2012. The PD&O affirmed the December 7, 2012 Department Order closing the Petitioner's claim. The Board denied the Petitioner's petition for review, adopting the PD&O as its final Decision. The Petitioner appealed the Board's decision to the Superior Court of King County.

C. Claimant's Appeals to Superior Court

The Superior Court of King County consolidated Ms. Koval's appeals for claims SE-27986 and SE-27848. The jury, after hearing all of the evidence, affirmed the Department and Board decisions as correct.

D. Claimant's Appeal to the Court of Appeals

At the Court of Appeals, the Claimant presented essentially two arguments: that the trial court abused its discretion when it gave Jury Instruction No. 10, and that the trial court abused its discretion when it excluded testimony that she had not received a vocational assessment prior to claim closure. Division I held that "Instruction 10 correctly stated the law of proximate cause and preexisting conditions." Slip Op. at 10. The Court of Appeals further held that "the exclusion of the testimony did not prejudice Koval because it...did not materially affect the outcome of the trial." *Id.* at 11.

VI. ARGUMENT

The Petitioner fails to establish credible reasons under RAP 13.4(b) for the Court to grant review of the Court of Appeals' November 6, 2017 unpublished opinion, and fails to demonstrate any error on the part of the trial court in giving Jury Instruction No. 10.

The Petitioner's very issue statement mischaracterizes Jury Instruction No. 10 by focusing exclusively on the last sentence of the instruction. The Petitioner claims that Instruction No. 10 "instructs the jury [that] Ms. Koval is not entitled to further benefits if her pre-existing conditions is *a* proximate cause of her current condition." Petition at 1, bolded text.

This Answer will first argue that Jury Instruction No. 10 is consistent with Supreme Court and Court of Appeals precedent, and that Review is unwarranted. Next, Auburn Regional will argue that the jury instructions given at the trial court were "sufficient" under *Keller v. City of Spokane*, 146 Wn.2d 237 (2002), and that even if misleading, no unfair prejudice resulted from Instruction No. 10. Last, Auburn Regional will argue that the Petitioner's improper and biased accounting of expert testimony given is both disingenuous and irrelevant.

A. Jury Instruction No. 10 is consistent with Supreme Court and Court of Appeals precedent, and therefore Review is not warranted under RAP 13.4(b)(1) and (2).

The Petitioner overtly mischaracterizes Jury Instruction No. 10 by focusing exclusively on the last sentence of the Instruction, and attempts to create the illusion of error where there simply is none. Jury Instruction No. 10 is consistent with Supreme Court and Court of Appeals precedent and review should therefore be denied.

The Petitioner seeks Review by this Court pursuant to RAP 13.4(b)(1) and (2). *See* Petition at 6-7. RAP 13.4(b) provides, in relevant part,

> A petition for review will be accepted by the Supreme Court only: (1) If the decision of the Court of Appeals is in conflict with a decision of the Supreme Court; or (2) If the decision of the Court of Appeals is in conflict with a published decision of the Court of Appeals.

Here, the Petitioner cites *Dennis*, *Miller*, *Shirley*, and *Wendt*[1] for the correct proposition that "an injured worker is entitled to benefits so long as the industrial injury is 'a' proximate cause of their current medical condition or disability." *Id.* at 1. The Petitioner proceeds to argue that the final bracketed sentence of Instruction No. 10 is inconsistent with the multiple proximate causation rule, as laid down by *Dennis*, *Miller*, *Shirley*, and *Wendt*. The Petitioner is incorrect.

Jury Instruction No. 10 tracked WPI 30.18.01 exactly. WPI 30.18.01 provides as follows:

> If [your verdict is for the [plaintiff] [defendant], and if] you find that:
>
> (1) before this occurrence the [plaintiff] [defendant] had a [bodily] [mental] condition that was not causing pain or disability; and
>
> (2) the condition made the [plaintiff] [defendant] more susceptible to injury than a person in normal health,
>
> then you should consider all the injuries and damages that were proximately caused by the occurrence, even though those injuries, due to the pre-existing condition, may have been greater than those that would have been incurred under the same circumstances by a person without that condition.
>
> [There may be no recovery, however, for any injuries or disabilities that would have resulted from natural

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[1] *Dennis v. Dep't of Labor & Indus.*, 109 Wn.2d 467, 745 P.2d 1295 (1987); *Miller v. Dep't of Labor & Indus.*, 200 Wash. 674, 94 P.2d 764 (1939); *Dep't of Labor & Indus. v. Shirley*, 171 Wn. App. 870, 288 P.3d 390 (Div. I 2012); and *Wendt v. Dep't of Labor & Indus.*, 18 Wn. App. 674, 571 P.2d 229 (Div. II 1977).

> progression of the pre-existing condition even without this occurrence.]

In other words, Instruction No. 10 provides that if 1.) prior to the claim being filed, the Petitioner was asymptomatic, and 2.) the preexistent conditions made the Petitioner more susceptible to injury, then the jury should consider all "injuries and damages" *proximately caused* by the industrial injury even though the pre-existing frailty contributed to a greater harm. In other words, if these conditions are satisfied, the claimant is to receive full recovery for all injuries or disabilities arising proximately from his or her industrial injury.

The final bracketed sentence of the WPI goes on to explain that further benefits are not indicated for "injuries or disabilities" proven to be proximately caused by a natural progression of the Petitioner's preexistent conditions. The clear implication of this sentence is that if the industrial injury has ceased to be a proximate cause of the Petitioner's "injury or disability," then no further benefits are due.

This reading of Instruction No. 10 is manifest, particularly considering Jury Instruction No. 8, read to the jury almost immediately prior to Instruction No. 10. Jury Instruction No. 8 was, precisely, the "multiple proximate causation" rule, for which the Petitioner cites *Dennis*, *Miller*, *Shirley*, and *Wendt*. Instruction No. 8 provided:

> There may be one or more proximate causes of a condition. For a worker to recover benefits under the Industrial Insurance Act, the industrial injury must be a proximate cause of the alleged condition for which benefits are sought. The law does not require that the industrial injury be the sole proximate cause of the condition.

CP at 71.

The Petitioner, without merit, tries to argue that this Court should grant review to reverse the Court of Appeals because it affirmed the trial court's Jury Instruction No. 10, ostensibly in contravention of Supreme Court and Court of Appeals precedent outlining the multiple proximate cause rule. The proximate causation rule, however, was expressly given as Jury Instruction No. 8, and Instruction No. 10 *read as a whole* is an accurate statement of the law governing proximate causation. Review should therefore be denied.

B. Jury Instruction No. 10 was "sufficient" under the laws provided by this Court.

The Petitioner cites this Court's *Keller* decision for the standards of what constitute "sufficient" jury instructions, but utterly fails to present arguments consistent with the law she cites. The jury instructions given at trial were "sufficient" under *Keller*, and the Court of Appeals' unpublished decision below does not warrant review.

This Court has held that jury instructions are "sufficient" when 1.) "they allow counsel to argue their theory of the case," 2.) they "are not

misleading," and 3.) "when read as a whole properly inform the trier of fact of the applicable law." *Keller v. City of Spokane*, 146 Wn.2d 237, 249, 44 P.3d 845 (2002)(citing *Bodin v. City of Stanwood*, 130 Wn.2d 726, 732, 927 P.2d 240 (1996)). "Even if an instruction is misleading, it will not be reversed unless prejudice is shown." *Id.* (citing *Walker v. State*, 67 Wn. App. 611, 615, 837 P.2d 1023 (1992), reversed by *Walker v. State*, 121 Wn.2d 214, 848 P.2d 721 (1993)).

First, the jury instructions provided at trial allowed the Petitioner to argue her theory of the case. The Court of Appeals' opinion addresses this criterion adeptly:

> Koval had an opportunity to present evidence to the jury in support of her argument that she was entitled to damages proximately caused by her industrial injuries. The jury considered evidence of her knee injuries and preexisting condition. The jury determined that Koval was not entitled to further medical treatment and was not temporarily totally disabled, and that...her 2010 injury did not objectively worsen between May 2010 and July 2013. Moreover, Koval was not totally and permanently disabled.

Slip Op. at 9.

Second, Jury Instruction No. 10 was not misleading, particularly insofar as the multiple proximate causation rule is concerned. The Petitioner's progression of preexisting conditions was the sole proximate cause of her physical condition and/or disabilities. And critically, the multiple proximate causation rule was clearly and expressly given to the

jury in Instruction No. 8, almost immediately prior to the reading of Instruction No. 10. Instruction No. 10 was not misleading.

Third, the jury instructions *read as a whole* properly informed the jury of the applicable law. As relevant to this Petition, the jury heard the multiple proximate causation rule as Instruction No. 8, and they heard Instruction No. 10 informing them that all "injuries or disabilities" arising proximately from the industrial injury are compensable, even those partly due to preexisting infirmity. The jury also heard Instruction No. 10's direction that the Petitioner was not to recover for conditions caused by her naturally progressing and preexistent conditions. This properly informed the jury of the applicable law. The jury instructions given were "sufficient" under *Keller*, and the trial court did not err in giving these instructions.

Lastly, even if Instruction No. 10 were found to be "misleading," the Petitioner has experienced no prejudice here. However, the Petitioner argues that "this optional sentence of WPI 30.18.01 makes any natural progression of Ms. Koval's pre-existing conditions a complete bar to any recovery whatsoever." Petition at 7. The Petitioner is again mistaken.

As already stated numerous times, the jury was clearly and expressly given the multiple proximate causation instruction. "Juries are presumed to follow instructions absent evidence to the contrary." *State v. Lamar*, 180 Wn.2d 576, 586, 327 P.3d 46 (2014)(citing *State v. Dye*, 178 Wn.2d 541,

556, 309 P.3d 1192 (2013); *State v. Kirkman*, 159 Wn.2d 918, 928, 155 P.3d 125 (2007)).

Additionally, in briefing before the Court of Appeals, the Petitioner admitted that her preexistent severe osteoarthritis was symptomatic at the time she sustained her industrial injuries. The Petitioner was not prejudiced by a jury instruction limiting her ability to recover once her industrial injury had returned to her baseline. There is zero precedent supporting the Petitioner's apparent belief that industrial insurance benefits must continue to flow for preexistent symptomatic conditions, even once the industrial injury to the same body part had resolved. The Petitioner's position is factually, legally, and logically untenable.

The Petitioner was permitted to argue the merits of her appeal, and did not prevail. The orders of the Department were affirmed at the Board, and the Board refused to grant review of the PD&Os issued therein. The jury empaneled at the Superior Court heard all evidence and arguments by the parties, were properly instructed of the relevant law, and affirmed the Board orders upholding the Department's orders. The Court of Appeals read the briefing and heard oral argument of the parties, and again affirmed.

The one line in Jury Instruction No. 10 complained of by the Petitioner did not unfairly prejudice her before the jury, and the Court of

Appeals decision was correct. Jury Instruction No. 10 was sufficient under *Keller*, and Review should be denied.

C. The Petitioner's attempt to reargue the factual merits of her case is improper under RAP 10.3(a)(5), misleading, and should not be considered.

The Petitioner's Statement of the Case is an improper and misleading attempt to undermine the Department's, the Board's, and the Jury's findings of fact. Further, the Petitioner's Statement of the Case fails the pleading requirements of RAP 10.3(a)(5). The Petitioner's Statement of the Case should be rejected.

"We should overturn an agency's factual findings only if they are clearly erroneous...and we are 'definitely and firmly convinced that a mistake has been made.' We do not weigh the credibility of witnesses or substitute our judgment for the PCHB's with regard to findings of fact." *Port of Seattle v. Pollution Control*, 151 Wn.2d 568, 588, 90 P.3d 659 (2004).

Here, the Petitioner seeks to challenge the factual findings and credibility determinations made by the Department of Labor and Industries, the Board of Industrial Insurance Appeals, and the jury impaneled at the Superior Court. *See* Petition at 2-5. The Petitioner does not allege that the Department, Board, and Superior Court's factual findings are "clearly

erroneous," nor does the Petitioner indicate any error in factual determinations made by the Department, the Board, and the Superior Court.

The Petitioner has overtly cherry-picked testimony in a misleading and argumentative manner. Not only does the Petitioner's account of expert testimony seemingly contradict three different tribunals' determinations, but it does so while failing to abide by the standard set by the Supreme Court in *Port of Seattle*.

Lastly, the Petitioner's Statement of the Case fails to adhere to RAP 10.3(a)(5). RAP 10.3(a)(5) explains that a "Statement of the Case" ought to be "[a] fair statement of the facts and procedure relevant to the issues presented for review, without argument." Here, the Petitioner's Statement of the Case is not a fair statement of the facts, is not responsive to the issues presented for review, and is argumentative on its face.

Petitioner states that "[t]he primary dispute in this appeal is what effect these injuries had on Ms. Koval's knees." Petition at 3. This is not correct. The Petitioner's own brief states that she is challenging Jury Instruction No. 10 as an incorrect statement of law, in contravention of established case law. This Petition presents a legal question that has little, if anything, to do with the relative effects of the Claimant's industrial injuries on her knees. These issues have already been litigated extensively. All three tribunals have determined that the Petitioner's "knee sprains"

temporarily aggravated her "severe pre-existing osteoarthritis," and that there was no objective worsening of the Petitioner's industrially related condition between the terminal dates.

As an ameliorative only, rebuttal facts are as follows. The Petitioner has severe and extensive preexisting osteoarthritis in her right knee that was diagnosed as early as 2002. Singer Trans. at 11-12; s*ee also,* Dinenberg Trans. at 14-17, 27-29, 37, 96, 99; and Makovski Trans at 21-22, 25. She is obese (300+ lbs) and had been prior to 2010, which is significant considering her preexistent degenerative knee conditions and her rate of decline. *See* Moore Trans. at 25; *see also*, Dinenberg Trans. at 19, 40. She was a candidate for total knee joint replacement surgery prior to 2010 but has been opposed to any surgery. Dinenberg 19, 40. The surgery was needed for a decade-plus degenerative process, not for the 2010 or 2011 sprains. *See* Dinenberg Trans. at 56-57, 74

The Petitioner failed to present any convincing objective evidence of a worsening of her right knee condition during the two terminal dates applicable for her application to reopen her original claim. CABR-1 at 45, 56-57, 61, 90; *id.* at 3; CP at 82-84. The Department, the Board, and the Superior Court have determined that a preponderance of the evidence points to the extensive preexisting osteoarthritic condition of her right knee as the cause of her mobility problems. And while unrelated to the present claim,

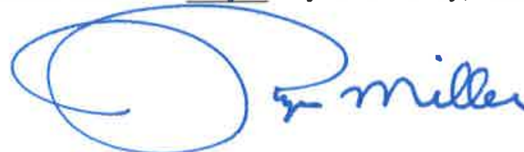
the only medical treatment available to the Appellant is a total knee replacement surgery to which she refuses to consent. *See* Dinenberg Trans. at 57.

The Petitioner's Statement of the Case is improperly argumentative, disingenuous, and seeks to argue irrelevant factual issues with dubious motive. The Department, the Board, and the Superior Court have all weighed the testimony and evidence offered in this case, and all have found that the credible evidence weighs against the issues raised by the Petitioner below. Additionally, the facts averred by the Petitioner are utterly irrelevant to the issues presented in the Petitioner's request for Review.

VII. CONCLUSION

Auburn Regional Medical Center respectfully requests the Court to deny the Petition for Review for the reasons indicated in Part VI.

RESPECTFULLY SUBMITTED this 4 day of January, 2018.



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