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No. 96075-5

SUPREME COURT
OF THE STATE OF WASHINGTON

RICHARD LEE,

Petitioner,

v.

CITY OF SEATTLE, ET AL,

Respondents

ANSWER TO PETITION FOR REVIEW

THE HUNSINGER LAW FIRM

By: Michael D. Hunsinger

WSBA No. 7662

6100 219th Street SW, Suite 480
Mountlake Terrace, WA 98043
(425) 582-5730

Attorneys for Respondents
Courtney Love Cobain and Frances Bean Cobain

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A. Introduction.

Appellant Richard Lee sued the City of Seattle and its police department after they refused to produce “death scene” photographs of the suicide of Kurt Cobain of the Seattle grunge rock band “Nirvana”. Mr. Cobain’s widow and surviving daughter, Courtney Love Cobain and Frances Bean Cobain (“the Cobains”), were granted leave to intervene in that lawsuit and asked the Court to permanently enjoin the City of Seattle from releasing them. The trial court granted the City’s motion for summary judgment dismissing Mr. Lee’s lawsuit, and the Cobains’ motion for summary judgment permanently enjoining the release of those photographs.

The Court of Appeals correctly upheld the trial court’s rulings, holding that:

- Because Lee failed to appeal from the trial court’s order granting the Cobains’ motion for summary judgment, assign error to it, analyze or otherwise discuss the ruling, or request relief from the ruling, he forfeited his right to review of the issue and that order. *Opinion*, page 7
- Granting the Cobains’ motion for summary judgment was correct because the release of the death-scene photographs of Kurt Cobain would shock the conscience and offend the community’s sense of fair play and decency, violating the Cobains’ substantive due process rights under the Fourteenth Amendment, and that permanently enjoining the City of Seattle from disclosing those photographs was a reasonable way to prevent such a violation. *Opinion*, page 11.

- Granting the motion for summary judgment by the City of Seattle and the Seattle Police Department (“the City”) was correct because the death-scene photographs were exempt from disclosure under RCW 42.56.070(1) of the Washington State Public Records Act (“PRA”). *Opinion*, pp. 13-14
- Granting the City’s motion for summary judgment on the other documents sought by Lee was correct because they were exempt from disclosure or authorized under other provisions of the PRA. *Opinion*, pp. 14-19

The Court of Appeals decision presents no basis for review under RAP 13.4(b). Mr. Lee’s Petition must be denied.

B. Restatement of Issues Presented for Review.

1. Did not the Court of Appeals correctly hold that Mr. Lee forfeited his right to appeal the trial court’s order granting the Cobains’ motion for summary judgment for failing to address it in his appeal? And, even if that holding were incorrect:

2. Did not the Court of Appeals correctly hold that the release of the death-scene photographs violated the Cobains’ substantive due process rights under the Fourteenth Amendment and that permanently enjoining the City from disclosing them was a reasonable way to prevent such a violation?

3. Did not the Court of Appeals correctly hold that the death-scene photographs were exempt from disclosure under the PRA?

4. Should not the other aspects of the trial court's rulings and the Court of Appeals opinion not be reviewed because they were not included in Lee's Petition for Review?

C. Restatement of the Case.

1. Kurt Cobain dies in April of 1994.

Courtney Love Cobain is the widow, and Frances Bean Cobain is the daughter, of Kurt Cobain, the lead singer of the band "Nirvana", who was discovered dead in the family home in Seattle on April 8, 1994. *Opinion*, page 2 At the time of their husband's and father's death, Courtney Love Cobain was 25 years old and Frances Bean Cobain had not yet turned two. (CP 273)

2. Mr. Lee has been obsessed with Kurt Cobain's death ever since.

The Court of Appeals properly, although with considerable understatement, characterized Lee as "a local conspiracy theorist who believes that Mr. Cobain was murdered." *Opinion*, page 2

In his Petition that initiated the litigation Mr. Lee admitted that he "visited the area of [Mr. Cobain's] death" that very day, and immediately after the discovery of Mr. Cobain's body, "began creating news and documentary material for his public access television program, known as Now See it Person to Person, [which] aired weekly for one year prior to this time, and [was] seen

throughout King County on cable television.” (CP 1)

Mr. Lee’s first broadcast on the subject of Cobain’s death, which he called “*Was Kurt Cobain Murdered?*”, was aired on April 13, 1994, only five days following the discovery of Mr. Cobain’s body. (CP 311) He testified that “[s]ince that time I have aired over 600 unique editions of this series, focusing on the Cobain homicide and closely related subjects of local police and politics, hundreds of hours of programs on the controversies surrounding Cobain’s death. It is fair to say that I am the world’s leading expert on Cobain’s death, and to my knowledge my program is likely the longest running public affairs television program in Seattle history.” (CP 331)

Throughout the ensuing 20-plus years of his obsession with Mr. Cobain’s death Mr. Lee has harassed Ms. Love Cobain¹, Nirvana bassist Krist Novoselic, former Washington State governor Gary Locke, former Seattle Police Chief Norm Stamper, former City of Seattle mayor Greg Nickels, and Kurt Cobain’s father and step-mother. (C) 340 – 358, 367 – 383)

In Ms. Love Cobain’s April 21, 2016 Declaration in support of

¹ He was arrested in Los Angeles in January 2005 on two felony accounts after stalking her. (CP 331).

the Cobains' Motion for Summary Judgment, she testified – and Mr. Lee did not dispute – that Mr. Lee has “stalked and harassed me, my family, and my friends for many, many years. . . . On one particular occasion, Mr. Lee even filmed himself chasing a limousine for several miles that he thought I was a passenger in. Mr. Lee's actions make me fear for my safety.” (CP 389)

In 2000 Mr. Novoselic filed a petition for antiharassment, contending that “for the prior six years Mr. Lee appeared at virtually every one of Novoselic's public appearances and had disrupted the events ‘by screaming accusations at [him] and shoving [a] camcorder into [his] face.’” (CP 361) The trial court granted the petition, concluding that Mr. Lee's conduct “evinced a course of conduct which is harassing, vexing, annoying and arguably assaultive to such a great degree that any reasonable person would feel their life and safety were compromised.” (CP 363)

3. Following Kurt Cobain's death, the City provided Mr. Lee with many documents in response to his public disclosure requests.

This is discussed in the City's Answer to Mr. Lee's Petition for Review.

4. The procedural history of this case.

In his petition against the City Mr. Lee contended that the Seattle Police Department had improperly rejected his request for “ANY AND ALL DOCUMENTS RELATED TO the March, 2014 effort to ‘reopen’ or ‘examine’ this the Kurt D. Cobain death case,” (CP 3). The City answered that it had disclosed all non-exempt records responsive to Mr. Lee’s request (CP 669)

The Cobains successfully moved to intervene in the case as additional Defendants and Cross-Claimants. (CP 102 - 103) In their Cross-Claims they sought a permanent injunction against the release of “any and all records of any kind . . . that the City of Seattle has not previously so disclosed or disseminated” pursuant to the PRA, Washington state common law, and their due process rights under the constitutions of the United States and the State of Washington. (CP 674)

The City filed a Motion for Partial Summary Judgment and the Cobains filed a Motion for [a full and complete] Summary Judgment. (CP 286 – 308)

The City of Seattle contended that Mr. Lee was not entitled to the requested documents because one subsection of the PRA, RCW 42.56.240(1), created an exemption for “[s]pecific intelligence

information and specific investigative records compiled by investigative, law enforcement, and penology agencies, and state agencies vested with the responsibility to discipline members of any profession, the nondisclosure of which is essential to effective law enforcement or for the protection of any person's right to privacy[.]" (CP 689)

The City of Seattle claimed that the "protection of any person's right to privacy" component of 42.56.240(1) had been satisfied because the requested documents "would be highly offensive to a reasonable person, and . . . not of legitimate concern to the public", the PRA's definition of "right to privacy" in RCW 42.56.050. (CP 690)

The Cobains' Motion for Summary Judgment, while supporting the City of Seattle's argument that the documents were exempt under the PRA's "protection of any person's right to privacy" prong, emphasized in three supporting declarations the damage that they and other members of their family would personally suffer if the requested "death scene photographs" were released.

Courtney Love Cobain testified that

- Kurt's death was the most traumatic experience of my life. It left me physically distraught, and I

continue to suffer emotionally from the loss of my husband to this day. . . . Certainly, public disclosure [of death-scene photos of Kurt that show his entire lifeless body, as well as the damage done by the shotgun blast to his head] would reopen all my old wounds, and cause me and my family permanent – indeed, endless and needless – pain and suffering and would be a gross violation of our privacy interests. (CP 385 – 386)

- I am particularly worried how the release of these photos will impact my daughter Frances. Frances never knew her father, and has had to deal with the trauma of his death her entire life. I know firsthand how difficult it was for her to cope with growing up. The release of these upsetting and offensive images would be incredibly harmful and destructive to her, and I do not want to see her suffer any more than she already has. (CP 388)

Frances Bean testified that

- Release and publication of the photographs would shock me and exacerbate the posttraumatic stress that I have suffered since childhood.
- Releasing the photographs also would physically endanger me and my mother. My mother and I both receive a constant stream of death threats from very disturbed individuals who are obsessed with my father Releasing these photographs into the public domain would encourage more disturbed stalkers and fanatical threats. It would make me feel even more unsafe in public and make me more fearful for myself and my family's safety. . . .

- I am not the only person who would be irreparably scarred by public disclosure of the photographs. . . . [My father's] parents (my grandmother and grandfather) and his sisters and brother (my aunts and uncle) would be especially vulnerable to emotional pain and trauma from knowledge that the pictures were public.(CP 391 – 392)

The Cobains asked the trial court to dismiss Mr. Lee's petition pursuant to not just the PRA but, as they sought in their cross-claims, "Washington state common law, and their due process rights under the constitutions of the United States and the State of Washington". (CP 306 - 308)

In their Motion the Cobains faced a different standard under the PRA than did the City of Seattle: to be awarded their requested injunctive relief the trial court had to find that releasing the records "would substantially and irreparably damage any person . . ." RCW 42.56.540.

On May 20, 2016, after substantial briefing and lengthy oral argument, the trial court entered orders granting both motions.

In its Order granting the City's Motion for Partial Summary Judgment the trial court found that it had met its burden of proving that the "death scene images" of Kurt Cobain were exempt under RCW 42.56.240(1). (CP 11 – 13) The City later filed a second Motion for Summary Judgment on one remaining issue to which

Lee did not appeal, which was granted on August 1, 2016 (CP 20 – 23). Three weeks later the trial court entered a Judgment for the City, dismissing all claims made by Mr. Lee with prejudice. (CP 28 – 32)

In its May 20, 2016 order granting the Cobains’ Motion for Summary Judgment, the trial court held that the information requested to be disclosed was exempt under RCW 42.56.050, injunctive relief was appropriate because its release “would substantially and irreparably harm the Cross-Claimants,” and “[f]or the same reasons, the disclosure of the requested information would also violate the Cross-Claimants’ right to privacy in violation of Washington state common law and the 14th Amendment to the United States Constitution.” (CP 6 – 10)

Unlike the order granting the City of Seattle’s motion for partial summary judgment, the Cobains’ summary judgment fully adjudicated their case against Mr. Lee: they sued for and were awarded a judgment permanently enjoining the City of Seattle from “disclosing, disseminating, releasing or distributing to any person, entity, agency, or member of the general public, any and all death scene images that the City of Seattle has not previously so disclosed or disseminated regarding the death of Kurt Cobain.” (CP 8) The

trial specifically found that “[t]he requested injunctive relief is therefore appropriate pursuant to RCW 42.56.540 as (a) the requested information specifically pertains to the Cross-Claimants; (b) an exemption to disclosure under RCW 42.56 applies; and (c) the disclosure would not be in the public interest and would substantially and irreparably harm the Cross-Claimants.” (CP 8)

As stated in the Introduction, *supra*, the Court of Appeals dismissed Mr. Lee’s appeal due to his failure to appeal the trial court’s granting of the Cobains’ motion for summary judgment dismissal, then upheld all of its other rulings too.

D. Argument Why Review Should Be Denied.

1. The Court of Appeals correctly applied Washington state law in dismissing Mr. Lee’s appeal for failure to properly appeal the Cobains’ summary judgment.

It is undisputed that in Mr. Lee’s opening appellate brief not only was the Cobains’ summary judgment order not one of the three assignments of error or one of the 15 “issues pertaining to” those assignments of error, it made not a single reference to the trial court’s due process holding at all.

In his Answer to the Motion to Dismiss filed by the Cobains in the Court of Appeals due to this omission, Mr. Lee claimed both

that these “omissions and mistakes” were “purely accidental”² and due to his “misunderstanding” that the due process issue was “a particularly weak aspect of the defendants’ arguments.” *Id.*, page 9 He now contends in his Petition at page seven that his “ostensibly reasonable perception was that the *Marsh* case was being addressed by inference, . . .”

In any event, the Court of Appeals was absolutely correct in applying the principles established by this Court in *State v. Olson*, 126 Wn. 2d 315, 320-321, 893 P.2d 629 (1995) and applied ever since: where, as here, the appellant “failed to appeal from the trial court’s order, assign error to the court’s ruling, analyze or otherwise discuss the ruling, or request relief from the ruling, he forfeits his right to review of the issue and the trial court’s order.” *Opinion*, page 7

That conclusion properly brought this case to an end against all defendants, as the supremacy clause of the United States Constitution³ operates to preempt state statutes that are

²Answer, page 8

³ “This Constitution, and the Laws of the United States which shall be made in Pursuance thereof, and all Treaties made, or which shall be made, under the Authority of the United States, shall be the supreme Law of the Land, and the Judges in every State shall be bound thereby, any Thing in the Constitution or Laws of any State to the Contrary notwithstanding.” Art. VI, cl. 2

inconsistent with it. *All-Pure Chemical Co. v. White*, 127 Wash. 2d 1, 5, 896 P.2nd 697 (1995)

Although the PRA is in no way inconsistent with *Marsh*, affirming the trial court's holding that disclosing the death-scene photographs would violate the Cobains' right to privacy in violation of the 14th Amendment to the United States Constitution renders moot Mr. Lee's arguments with respect to the PRA, and requires that this appeal to be dismissed against both Respondents.

2. **The Court of Appeals correctly upheld the trial court's ruling that the disclosure of the death-scene photographs would violate the Cobains' substantive due process rights under the Fourteenth Amendment and enjoined the City from disclosing or distributing any of the death-scene photographs.**

In *Marsh v. County of San Diego*, 680 F.3d 1148 (9th Cir. 2012), Ms. Marsh's son died from a severe head injury while in the care of her then-boyfriend, who was prosecuted and convicted for second degree murder. Many years later Ms. Marsh learned that the San Diego County deputy prosecuting attorney had retained a copy of an autopsy photograph of her son "as a memento" and later gave it to a newspaper and a television station.

Ms. Marsh sued the prosecutor and San Diego County under 42 U.S.C. §1983 for violating her Fourteenth Amendment due

process rights. The Court succinctly analyzed Ms. Marsh's contentions:

Marsh claims that when she learned that Coulter sent her son's autopsy photograph to the press, she was "horrified; and suffered severe emotional distress, fearing the day that she would go on the Internet and find her son's hideous autopsy photos displayed there." Marsh's fear is not unreasonable given the viral nature of the Internet, where she might easily stumble upon photographs of her dead son on news websites, blogs or social media websites. *Marsh*, at page 1155

The Ninth Circuit noted that the United States Supreme Court has recognized that "one aspect of the liberty" protected by the Due Process Clause of the Fourteenth Amendment is "a right of personal privacy, or a guarantee of certain areas or zones of privacy" that protects two kinds of interests. "One is the individual interest in avoiding disclosure of personal matters, and another is the interest in independence in making certain kinds of important decisions." *Marsh*, at 1153 (citations omitted) The Court found that "[t]he long-standing tradition of respecting family members' privacy in death images partakes of both types of privacy interests protected by the Fourteenth Amendment." *Id.*, at 1154

To violate substantive due process, the *Marsh* court noted that the alleged conduct must also "shock [] the conscience' and 'offend the community's sense of fair play and decency.'" *Id.*, at

1155 (citation omitted), and that “[n]o court has yet held that this right encompasses the power to control images of a dead family member, but the Supreme Court has come close in a case involving the Freedom of Information Act [citing *National Archives and Records Administration v. Favish*, 541 U.S. 157, 124 S. Ct. 1570 (2004)]”. *Id.*

The Ninth Circuit concluded that “[t]he intrusion into the grief of a mother of her dead son – without any legitimate governmental purpose – ‘shocks the conscience’ and therefore violates Marsh’s substantive due process right.” *Marsh*, at 1155

Marsh is consistent with 20 years of Washington state law creating and protecting the right of privacy.

In 1998 the Washington State Supreme Court explicitly held that “the common law of right of privacy exists in this state and that individuals may bring a cause of action for invasion of that right” in *Reid v. Pierce County*, 136 Wash.2d 195, 206, 961 P.2d 333 (1998).

It did so by applying its opinion 20 years earlier in *Hearst v. Hoppe*, 90 Wash.2d 123, 135-136, 580 P.2d 246 (1978), where it defined the right to privacy in RCW 42.17.310(1) (the predecessor of the PRA) by using the common law tort liability language of Restatement (Second) of Torts § 6251D, at 383 (1977): “One who

gives publicity to a matter concerning the private life of another is subject to liability to the other for invasion of his privacy, if the matter publicized is of a kind that (a) would be highly offensive to a reasonable person and (b) is not of legitimate concern to the public.” It emphasized this comment in the Restatement:

Every individual has some phases of his life and his activities and some facts about himself that he does not expose to the public eye, but keeps entirely to himself or at most reveals only to his family or to close personal friends. Sexual relations, for example, are normally entirely private matters, as are family quarrels, many unpleasant or disgraceful or humiliating illnesses, most intimate personal letters, most details of a man’s life in his home, and some of his past history that he would rather forget. When these intimate details of his life are spread before the public gaze in a manner highly offensive to the ordinary reasonable man, there is an actionable invasion of his privacy, unless the matter is one of legitimate public interest. *Hearst*, at 136

The Supreme Court noted in *Hearst* that the language of Restatement § 6251D was similar to several exemptions to the Federal Freedom of Information Act, 5 U.S.C. §552(b) (“FOIA”). *Id.*

In Reid at page 206, the Supreme Court quoted the following excerpt from *Hearst* at page 136:

In addition to the fact that the *tort right is the most widely recognized and established definition of the legal right of privacy*, the context in which that right has emerged and the considerations surrounding its development are

uniquely analogous to the values and interests
which subsection (1)(c) appears designed to protect
[right to privacy]. [emphasis in the original]

Reid actually consisted of four consolidated cases, each brought by relatives of decedents who died in Pierce County, each alleging that Pierce County employees retained and displayed death scene or autopsy photographs of their loved ones. Two of those cases involved decedents who were very well-known politicians about whom there was considerable public interest: former Washington State Governor Dixie Lee Ray and former Tacoma Mayor Jack Hyde.

The Supreme Court “explicitly” affirmed the existence of the common law of right of privacy in the state of Washington even to well-known public figures, and extended it beyond the grave: “. . . the immediate relatives of a decedent have a protectable privacy interest in the autopsy records of the decedent. That protectable privacy interest is grounded in maintaining the dignity of the deceased.” *Reid*, at 212

Mr. Lee’s scatter-shot and rambling discussion about this issue in his Petition veers from questioning whether there was enough evidence that the death-scene photographs were gory or gruesome (page 9), to contending that the “already-released

disturbing images are what we should reasonably expect could cause the anxiety and harm that the Cobains asserted in their emotional declarations” (page 10), to his speculative theory that Kurt Cobain was not shot in the head (pages 11 – 12), to the *non sequiturs* about the Cobains’ celebrity and their alleged (although uncorroborated) wealth. (pages 13-14)

But the undisputed and relevant facts presented by the Cobains in their motion for summary judgment were, as the Court of Appeals stated in its opinion at page 11:

... the [death-scene] photographs are more than an oddity showcasing the tragic end of a celebrated musician – to those who knew Mr. Cobain, the photographs show the lifeless body of a son, a father, a husband, or a friend. As the Cobains’ declarations establish, the disclosure of these photographs would allow the entire world to peer into one of the most private and distressing events of the Cobains’ lives. Once released, the photographs would become ammunition for those who wish to taunt and antagonize the Cobains and their friends.

In its opinion at page eight the Court of Appeals accurately described the elements of an injunction and the trial court’s broad discretionary power to fashion it. And at page 11 it properly found that the trial court’s order that the City was “permanently enjoined, prohibited, and restrained from disclosing, disseminating, releasing or distributing [the death-scene photographs]” was “a reasonable

way to prevent such a violation [of the Cobains' substantive due process rights under the Fourteenth Amendment]" based on that court's findings of fact and conclusions of law in its Order. (CP 12)

3. **The Court of Appeals correctly applied Washington state law in upholding the trial court's ruling that the death-scene photographs were exempt under the PRA.**


This issue will be addressed by the City in its Answer to Mr. Lee's Petition for Review.

E. Conclusion.

None of the rulings in the Court of Appeals opinion conflicts with prior decisions of the Washington Supreme Court or of any of its Court of Appeals, nor furthers a substantial public interest, under RAP 13.4(b). This Court should deny review.

Dated this 17th day of August, 2018.

THE HUNSINGER LAW FIRM

By: 
Michael D. Hunsinger
WSBA No. 7662

Attorneys for Respondents
Courtney Love Cobain and
Frances Bean Cobain

THE HUNSINGER LAW FIRM

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