NO. 96189-1

IN THE SUPREME COURT
OF THE STATE OF WASHINGTON

MICHAEL WEAVER

Respondent,

v.

CITY OF EVERETT, DEPARTMENT OF LABOR AND INDUSTRIES

Appellants.

ANSWER OF RESPONDENT MICHAEL WEAVER TO DEPARTMENT OF LABOR & INDUSTRIES' PETITION FOR REVIEW

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I. INTRODUCTION

Petitioners the City of Everett and the Department of Labor & Industries asserted collateral estoppel and *res judicata* as defenses to Michael Weaver's current claim. To prevail, they were obligated to establish all the elements of at least one of these two doctrines. The Court of Appeals correctly held that they failed on both counts.

Although both petitions discuss both doctrines, the City's petition focuses mainly on *res judicata*, while the Department's is directed mostly at collateral estoppel. Accordingly, in this Answer to the Department's petition Weaver addresses petitioners' collateral estoppel arguments. He discusses their *res judicata* arguments in his Answer to the City's petition.

Despite the contention of the Department and the City to the contrary, the decision of the Court of Appeals rejecting their defense of collateral estoppel is in harmony with the decisions of this Court. Indeed, it is the Department and the City who seek a radical departure from well-established Washington law. They argue that for workers' compensation cases this Court should carve out an exception to the established law of collateral estoppel by removing the requirement that application of the doctrine would not work an injustice on the party against whom it is asserted. Unless the Court is prepared to create the exception that the

Department and the City advocate, there is no reason why the Court should accept review.

II. STATEMENT OF THE CASE

A. The First Claim

Weaver worked as a firefighter for the City from 1996 until January 2014. A mole on Weaver's scapula was removed in June, 2011. A biopsy showed it was melanoma, which was then surgically removed. CBR 193. He missed five weeks of work. CBR 193. Nothing in the record suggests that Weaver was ever informed that his cancer might return after the melanoma was removed in 2011. His understanding was that he was fine, and that all of the cancerous tissue had been removed. CBR 193.[1] His subsequent exams over the next two and a half years revealed no additional cancer or reoccurrence of the melanoma.

Weaver filed a claim for temporary total disability benefits for the short period of work he missed following his 2011 surgery. CBR 193, 274. If the melanoma had been recognized as work-related, the temporary disability benefits for this period would have been less than $10,000.00. CBR 193. The Department denied the claim. CBR 278.

[1] "CBR" refers to the Certified Board Record.

With his former counsel, Mr. Weaver appealed to the Board. Little evidence was presented at the hearing regarding his easily proven occupational sun exposure. CBR 371, 376-378, 381. More was made of the various toxins to which firefighters are exposed. CBR 366-370, 372-374, 381-393. Weaver's counsel did not prepare him for the hearing. CBR 48-49. Weaver's counsel appeared for the hearing 90 minutes late. *Id.* Weaver's counsel presented no testimony from Dr. David Aboulafia, Weaver's treating oncologist, nor any from a medical expert in oncology or dermatology. CBR 252; *Weaver v. City of Everett*, 4 Wn.App.2d 303, 310, 421 P.3d 1013 (2018). Instead, counsel presented deposition testimony from a doctor with a practice in family and emergency medicine, but with no expertise in melanoma generally or in melanoma arising from occupational exposures specifically. CBR 199-202; 4 Wn.App. at 310. In the case of firefighters, melanoma is presumed to be an occupational disease. RCW 51.32.185. Employers can rebut this presumption by a preponderance of the evidence. The Board found that the City had overcome the presumption. CBR 264.

Weaver's lawyer withdrew. CBR 49. Weaver filed a pro se appeal to the superior court, but later dismissed it in December 2013. CBR 49-50. Nothing in the Board's Order denying his first claim warned Weaver that if he did not pursue his appeal and achieve success in the superior court,

he would be forever barred from pursuing a second claim if the cancer ever returned.

B. <u>The Second Claim</u>

In early 2014 Weaver started having headaches and experienced word finding problems. CBR 318-19. An MRI revealed a three-centimeter mass in the left frontal lobe of Weaver's brain. CBR 319. Immediate surgery resulted in removal of the tumor, which was found to be a metastatic melanoma. CBR 320. A later MRI showed two new growth sites near the original site of the brain metastases. CBR 321.

Faced with brain cancer and certain permanent total disability, Weaver filed a new claim for an occupationally caused metastatic melanoma. CBR 275. After the Department rejected the claim, Weaver – with new counsel – appealed to the Board. CBR 67, 276. The City moved for summary judgment (1) based on *res judicata* and collateral estoppel, and (2) on the substantive issue of whether Weaver's employment caused his cancer. CBR 229-245.

In response, Weaver presented evidence establishing the relationship between his occupational sun exposure and his cancer. Firefighters were required to participate in outdoor training exercises two to four times per month. CBR 100, 104-05. In summer, there was little shade. CBR 105. Weaver often trained with his shirt off, as allowed. CBR

105, 107, 193. He developed sunburns on several occasions while training as a firefighter. CBR 100, 193. The Department misrepresents Weaver's testimony in the first claim. Although he described one incident in which he was sunburned while training, he did not testify that this was the only such incident. CBR 377-78. He testified that *outside of his work as a firefighter*, he could recall only one incident when he was sunburned on his upper shoulders or back. CBR 381. And that occurred when he was a child. CBR 378-79.

Dr. Aboulafia's declaration fully supported Mr. Weaver's claims. CBR 108-109. Because he is Weaver's treating oncologist, Dr. Aboulafia's testimony is accorded special weight. *Hamilton v. Dept. of Labor and Industries*, 111 Wn.2d 569, 570, 761 P.2d 618, 619 (1988). Weaver also presented testimony from Dr. Andrew Brodkin, an international authority in occupational medicine. CBR 134-166. In a leading textbook on Occupational and Environmental Medicine, Dr. Brodkin edited chapters related to skin cancer, including melanoma, as well as the occupational health of firefighters. CBR 136-37. He reviewed the medical and work site information generated during the second appeal, and opined that Weaver's cancer was caused by his intermittent sunburns while training as a firefighter. CBR 137-44.

Agreeing with the City's arguments on collateral estoppel and *res judicata*, however, the Board granted the City's motion for summary judgment. CBR 57. It did not reach the merits of the issue of causation. *Id.* The superior court affirmed the Board's decision. CP 16-18. The Court of Appeals reversed. *Weaver*, 4 Wn.App.2d at 309, 337.

The contrast between what was at issue in the first claim compared to the second could hardly be more dramatic. At most, success in the first claim would have covered the cost of medical care (covered by employer paid medical insurance anyway), and a brief period of missed work and wages. Success in the present case would be mean an award of permanent total disability benefits to Mr. Weaver and, in the event of his death from his present cancer, a pension for his widow. The most likely outcome after a metastatic melanoma diagnosis is a 20 to 30 percent chance of being alive in two years. CBR 324. The likelihood of survival shrinks further after that. CBR 324.

III. ARGUMENT WHY REVIEW SHOULD BE DENIED

A. The Court of Appeals Followed the Law Established by this Court Concerning Collateral Estoppel

To prevail on the basis of collateral estoppel, the party asserting the doctrine's application must establish:

> (1) identical issues; (2) a final judgment on the merits; (3) the party against whom the plea is asserted must have been a party to or in privity with a party to the prior adjudication; and (4) application of the doctrine must not work an injustice on the party against whom the doctrine is to be applied.

Hadley v. Maxwell, 144 Wn.2d 306, 311, 27 P.3d 600 (2001). The Court of Appeals found the first three elements were satisfied. 4 Wn.App.2d at 316. But with regard to the fourth element, it held that application of the doctrine would work an injustice on Weaver. *Id.*

The decision of the Court of Appeals is fully consistent with *Hadley*. In that case, Maxwell's and Hadley's vehicles collided in an accident. 144 Wn.2d at 308-309. A state trooper issued a traffic infraction citation to Maxwell for an improper lane change. *Id.* The maximum fine was $95. *Id.* at 309, 312. Maxwell contested the citation at a hearing, but the traffic court judge found that she had committed the infraction and fined her $47. *Id.* at 309. Maxwell could have appealed that result to superior court, but she did not do so. *Id.*

Hadley later brought a personal injury action against Maxwell. 144 Wn.2d at 309. Giving collateral estoppel effect to the district court's decision concerning the traffic infraction, the superior court judge barred Maxwell from denying that she violated the lane-change statute—finding that the prior traffic court outcome ordained the outcome in the second, and more serious, tort case. *Id.* at 309-310. Using the prior finding in her case

in chief, Hadley persuaded a jury that Maxwell was liable and the jury awarded substantial damages to Hadley. *Id.* at 310.

This Court reversed. 144 Wn.2d at 315. It held that application of collateral estoppel on these facts worked an injustice on Maxwell. *Id.* at 312-315. The court held that the doctrine should be applied only if "'the party against whom the estoppel is asserted [had] interests at stake [in the first proceeding] that would call for a full litigational effort.'" *Id.* at 312 (quoting 14 Lewis H. Orland & Karl B. Tegland, *Washington Practice: Trial Practice, Civil* § 373, at 763 (5th ed.1996)). "There must be sufficient motivation for a full and vigorous litigation of the issue." *Id.* at 315. Since there was nothing more at stake in the underlying proceeding than a $47 fine, the court held that Maxwell had little incentive to vigorously litigate the issue. *Id.* at 309, 312. It was therefore unjust to apply the doctrine against Maxwell. *Id.* at 315.

As in *Hadley*, Weaver's incentive to litigate his first claim was low. He had missed only five weeks of work, and the amount of the temporary disability benefits he sought was less than $10,000. Moreover, the cost of the expert witnesses necessary to litigate his case vigorously exceeded the amount he could have recovered in the first claim. In the litigation of the second claim, the oncology specialist retained by Weaver had alone been paid $19,000 at the time of oral argument in the Court of Appeals. *Weaver*,

4 Wn.App. at 310, n.2. With less than $10,000 at stake in the first claim, Weaver did not have sufficient incentive for a full litigational effort. *Hadley*, 144 Wn.2d at 312. Application of collateral estoppel would work an injustice on Weaver. *Id.* at 315.

The Department argues that the Court of Appeals misapplied *Hadley* because in that case there was a difference in "magnitude" between a maximum $95 traffic fine and a personal injury action. But the difference between the amount at stake in the two claims in this case is also on an order of considerable magnitude. The less than $10,000 at stake in the first claim is a tiny fraction of the benefits available for permanent total disability and death, should Weaver prevail in the current claim. Weaver was only 45 years old when diagnosed with brain cancer in January 2014, has not worked since then, and will almost certainly never work again. If he, or after his death his wife, prevails in the current claim, then when his brain cancer kills him his wife will be entitled to substantial death benefits. RCW 51.32.050. *Hadley* applies here.

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B. The Department and the City Argue, Contrary to the Existing Law, that in Workers' Compensation Cases the "Injustice" Element of Collateral Estoppel Does Not or Should Not Apply[2]

The Department and the City rely on collateral estoppel in this case. They both contend that this common-law doctrine is essential to the operation of the workers' compensation system. But at the core of their request for review is their argument that in workers' compensation cases the Board or the court must apply collateral estoppel regardless of whether doing so will work an injustice on the party against whom the doctrine is invoked. This position is fundamentally at odds with the existing law.

As *Hadley* demonstrates, determining whether an injustice would be done requires the court to consider whether "the party against whom the estoppel is asserted [had] interests at stake [in the first proceeding] that would call for a full litigational effort." 144 Wn.2d at 312. In the present case, this necessarily requires a comparison between the benefits for Weaver's five-week period of temporary disability, on the one hand, and those for his permanent total disability beginning at age 45 and likely death, on the other. Determining the extent of a "full litigational effort" may, as in this case, call for consideration of the cost of the expert witnesses necessary to present a party's case vigorously.

[2] The City joins in the collateral estoppel arguments of the Department's petition. City Pet. at 12. Thus, the City adopts all of the Department's arguments on this issue.

But the Department contends that it and the Board (and the courts on review of their decisions) should not have to consider issues such as "the amount of benefit, the type of witnesses, and nature of the condition." Dep't Pet. at 18-19. Indeed, the Department argues that in workers' compensation cases, it is *never* appropriate to consider "individual circumstance to determine if there was injustice." *Id.* at 19, n.9. Instead, the Department continues, "as a matter of law, it is fair to apply collateral estoppel" in workers' compensation cases without considering the different benefits sought in the two proceedings. *Id.*

The Department's position, therefore, is that if the other three elements of the doctrine are established, collateral estoppel applies automatically in workers' compensation cases, and the question of whether the doctrine's application would cause injustice is simply thrown out the window. The Department cites no case for this proposition. There is no such case, of course, because neither this Court nor the Court of Appeals has ever declared that the fourth element of collateral estoppel does not apply in workers' compensation cases.

The Department says that requiring it and the Board to consider the adequacy of Weaver's incentive to fully litigate his claim for 5 weeks of benefits would be inconsistent with the Industrial Insurance Act's declaration that it be liberally construed to reduce economic suffering.

Dep't Pet. at 19 (citing RCW 51.12.010: "This title shall be liberally construed for the purpose of reducing to a minimum the suffering and economic loss arising from injuries and/or death occurring in the course of employment." But the Department's position would deny Weaver and his family any relief for the brain cancer that has rendered him unable to work and that will kill him, without considering the question of whether he had adequate incentive to litigate fully when seeking temporary disability benefits worth less than $10,000.

Collateral estoppel is an equitable doctrine. *Afoa v. Port of Seattle*, __ Wn.2d __, 421 P.3d 903, 914 (July 19, 2018). Equity, by its very nature, requires the court to consider the individual circumstances of a given case to determine whether justice is being done. Thus, collateral estoppel (and res judicata) "can be adjusted to accommodate whatever considerations are necessary to achieve the final objective—doing justice." Phillip A. Trautman, "Claim and Issue Preclusion in Civil Litigation in Washington," 60 WASH. L. REV. 805, 842 (1985). To remove the "injustice" element would be to eliminate the very feature of collateral estoppel that gives it its equitable character.

To adopt the petitioners' position would be to guarantee that in workers' compensation cases collateral estoppel would be "applied mechanically to work an injustice" – precisely the inequitable result this

Court warned against in *Hadley*. 144 Wn.2d at 315. Surely the Court does not wish to produce that result. Thus, review should be denied.

C. The Claim Filing Statute and the Aggravation Statute Do Not Automatically Establish the Incentive for a Full Litigational Effort

To support its argument that collateral estoppel applies automatically, without regard to "individual circumstance to determine if there was injustice" (Dep't Pet. at 19, n.9), the Department contends that upon the filing of *any* claim, the worker necessarily has sufficient motivation for a full litigational effort. This is true, the Department maintains, no matter how small the amount at issue may be at the time the claim is filed.

The Department contends that two statutes lead to this result. The first is RCW 51.28.020, which directs the worker to file an application for compensation. The filing of the application, says the Department, leads to a "claim allowance" determination. But nothing in RCW 51.28.020 says anything about "allowance" of a claim.[3] More importantly, the statute gives the worker no reason whatsoever to conclude that if the claim is not

[3] Indeed, it appears that of the 28 statutes cited in the Department's petition, only two refer to the allowance of a claim. RCW 51.28.055, irrelevant here, says that claims for hearing loss not timely filed can only be allowed for medical aid. And RCW 51.32.185(9) says that in cases involving presumed occupational disease for firefighters, the firefighter may recover attorneys' fees incurred in appeals to the Board or the courts if "the final decision allows the claim for benefits." This statute says nothing however, about any initial "claim allowance" by the Department.

"allowed," he will never be able to seek benefits in a second claim if the injury or disease later becomes drastically more severe.

Second, the Department points to the aggravation statute, RCW 51.32.160. It provides in pertinent part: "If aggravation . . . of disability takes place, the director may . . . readjust the rate of compensation." This language, too, fails to advise the worker that if his claim is not "allowed" at a time when the injury or illness has caused him to miss only a few weeks of work, he or his beneficiary will be unable to seek benefits when it later renders him permanently disabled or kills him.

Neither RCW 51.28.020 (application for compensation) nor RCW 51.32.160 (aggravation) advises the reader that there is peril present beyond the level indicated by the worker's circumstances at that time. A modest claim, so a reading of the statutes would reveal, whether successful or not is never said to govern the outcome of a later, more serious claim. Nothing in these statutes gives workers any reason to perceive the draconian consequences that would follow---if the Department's argument were accepted---if the worker failed to use every conceivable resource while litigating what appears to be a minor claim. These statutes do not justify the wholesale abandonment of the requirement that collateral estoppel must not work an injustice on the party against whom it is applied.

D. The Decision of the Court of Appeals Does Not Conflict with the Cases on Which the Department Relies

McCarthy v. Dep't of Soc. & Health Servs., 110 Wn.2d 812, 759 P.2d 351 (1988), cited by the Department, is distinguishable. The Court neither conducted nor mentioned the established four-part analysis for determining whether collateral estoppel applies. No party argued that application of the doctrine would be inequitable, or that there was insufficient incentive to litigate the first claim vigorously. *McCarthy* did not address the issues presented here.

Kingery v. Dep't of Labor & Indus., 132 Wn.2d 162, 937 P.2d 565 (1997), *Marley v. Dep't of Labor & Indus.*, 125 Wn.2d 533, 886 P.2d 189 (1994), and *Abraham v. Dep't of Labor & Indus.*, 178 Wash. 160, 34 P.2d 457 (1934), did not even mention collateral estoppel, much less the doctrine's four elements. Moreover, all three of these cases concerned requests to *vacate* or *set aside* a prior order issued the Department. Here, the Court of Appeals did not vacate or set aside the Board's prior order, nor did Weaver request such relief. *Le Bire v. Dep't of Labor & Indus*., 14 Wn.2d 407, 128 P.2d 308 (1942), did not use the phrase "collateral estoppel," and did not mention the four-element analysis adopted by this Court for determining the doctrine's application. None of these cases has any bearing on the collateral estoppel issue presented in the present case.

Accordingly, there is no conflict between any of them and the decision of the Court of Appeals. [4]

Citing *Reninger v. Dep't. of Corrections,* 134 Wn.2d 437, 951 P.2d 782 (1988), and *Thompson v. Dep't. of Licensing*, 138 Wn.2d 783, 982 P.2d 601 (1999), the Department argues that in determining whether the party had sufficient incentive to litigate the first proceeding vigorously, the court looks exclusively to procedural fairness. On the contrary, *Reninger* recognizes that significant disparity between the amounts at stake in the two proceedings may support the conclusion that the party had insufficient incentive to litigate the first one and thus that collateral estoppel should not apply.

> [C]ourts look to disparity of relief [between the first and second actions] to determine whether sufficient incentive existed for the concerned party to litigate vigorously. Courts have reasoned that, if the amount a party can recover in an administrative proceeding is insignificant, the party is not likely to have litigated the crucial issues vigorously and it would be unfair to employ collateral estoppel against that party in future proceedings to prevent the relitigation of those same issues in another forum.

134 Wn.2d at 453.

[4] Nor is there any conflict between any of these cases and the Court of Appeals' decision concerning *res judicata*. See Weaver's Answer to City's Petition.

In *Thompson*, the Court expressly considered the question of whether the party against whom collateral estoppel was applied had incentive to litigate the issue vigorously in the prior proceeding. 138 Wn.2d at 799. Thus, *Thompson* supports the rule that in determining whether collateral estoppel would work an injustice, the court must consider the question of adequate incentive to litigate.

In *Schibel v. Eymann*, 189 Wn.2d 93, 399 P.3d 1129 (2017), the parties against whom collateral estoppel was applied did not argue that they had insufficient incentive to litigate the issue vigorously in the first proceeding. *Schibel*, therefore, is irrelevant here.

E. The Rule Proposed by Petitioners Would Require a Radical Change in the Law, with Substantial Harmful Effects; and the Decision of the Court of Appeals Will Not Have the Dire Consequences Predicted by Petitioners

The decision of the Court of Appeals applies the established law of collateral estoppel to the facts of this case. In their petitions, the Department and the City ask the Court to depart from that law by eliminating the fourth element of the doctrine from workers' compensation cases. They ask this Court to hold that collateral estoppel automatically applies to decisions of the Board even if the result would work an injustice on the party against whom the doctrine is asserted.

If the Court were to so hold, workers like Weaver would be denied the benefits they deserve. Few if any of them will know -- when they file claims for short periods of temporary disability or claims just for medical benefits -- that their failure to spend the money required for a full litigational effort will bar them from seeking the exponentially greater benefits needed should their conditions worsen terribly in the future. Certainly nothing in the Industrial Insurance Act or the orders of the Department or the Board gives them any reason to appreciate that peril.

And for those few workers who might understand the automatic preclusive effect that the petitioners propose, the result in many cases will be wasted money. These workers, faced with the prospect of future preclusion, will feel compelled either to forego a minor claim entirely or to spend large sums litigating even those claims in which the injury/illness has resulted in only brief disability. In all likelihood, most of those injuries or illnesses will not worsen. But the money will have been spent.

Leaving the decision of the Court of Appeals in place will not have the dire consequences that the Department and the City describe. As they point out, most claims involve only a request for medical benefits. So long as no improper preclusive effect later stems from the initial contest, parties in the workers compensation arena can be trusted to use logic and good business judgment to decide when to contest, or not contest, a particular

claim. Should a worker sensibly wish to advance a claim for $10,000 in non medical benefits by spending nearly $20,000 in expert witness fees, or more, to do so? Should an employer litigate every modest medical or time loss compensation claim for fear its economic profile might, in the worker's lifetime, radically change?

Neither of those outcomes is desirable and neither is required so long as an aggrieved party—whether department or worker---has an opportunity to later litigate if or when, for example, the worker's cancer transforms from being a brief medical and occupational annoyance to a menace which could cause serious peril or potential death.

The imaginary horribles envisioned by the department are better addressed using precisely respondent's---and the Court of Appeals'—construct for confronting later claims which bear little resemblance to the harm or economic profile of the initial, minor, claim. By judicious use of claim preclusion principles, when a worker or an employer is faced with a 'later' claim that presents either with harm disproportionate to the scale of the past efforts to address that claim, recalibration of the opposing efforts by the parties is warranted and expectable. And allowing the system to function with the intact safeguards of *res judicata* and collateral estoppel will encourage savvy use of resources for only those contests which really 'matter.'

F. Attorneys' Fees

If on remand to the Board it is determined that Weaver is entitled to benefits, he will be entitled to recover his attorneys' fees incurred in all Board proceedings and in all appeals to any court. RCW 51.32.185(9). In that event, and if this Court denies review of the Court of Appeals' decision, this Court should award Weaver his reasonable attorneys' fees incurred in preparing this Answer to the Department's petition. RAP 18.1(j).

IV. CONCLUSION

The decision of the Court of Appeals concerning collateral estoppel does not conflict with any decisions of this Court. The petitioners, on the other hand, seek a rule that would require a dramatic change in the law. And that rule, if adopted, would unfairly prevent workers like Weaver from pursuing the benefits available to them when an injury or disease becomes far more severe than at the time of a prior claim. This Court should deny review.

Respectfully submitted this 15th day of October, 2018.

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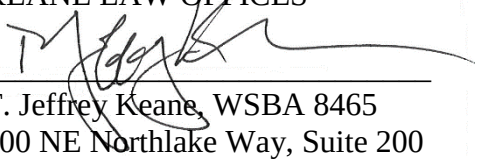

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