FILED
SUPREME COURT
STATE OF WASHINGTON
12/3/2018 2:52 PM
BY SUSAN L. CARLSON
CLERK

NO. 96433-5

IN THE SUPREME COURT
OF THE STATE OF WASHINGTON

HOUSING AUTHORITY OF THE CITY OF SEATTLE, WASHINGTON, a public body corporate and politic,

Plaintiff / Respondent,

v.

STANLEY MAYNOR,

Respondent / Petitioner.

PLAINTIFF/RESPONDENT'S REPLY BRIEF

Linda J. Brosell, WSBA No 22260
Seattle Housing Authority
190 Queen Anne Ave. N., 5th floor
Seattle, WA 98109
206-615-3315
Plaintiff/Respondent / Seattle Housing Authority

TABLE OF CONTENTS

I. INTRODUCTION 1

II. IDENTITY OF RESPONDENT 1

III. COURT OF APPEALS DECISION 2

IV. SUMMARY 2

V. SHA'S STATEMENT OF ISSUES 3

VI. STATEMENT OF THE CASE 4

VII. ARGUMENT 5

VIII. CONCLUSION 9

TABLE OF AUTHORITIES

Statutes

RCW 2.24.050 .... 6, 7
RCW 35.82.010 *et seq.* 1
RCW 59.12 & 59.18 *et. seq* 8
RCW 59.12 and 59.18 *et. seq* 1
RCW 59.12 and 59.18, *et. seq.* 3
RCW 59.18.030 9
RCW 59.18.055 8
RCW 59.18.380 10

Cases

Faciszewski v. Brown, 185 Wn.2d 1040, §10 and footnote 2; 386 P.3d 711 (2016) 6
Hous. Auth. of City of Everett v. Terry, 114 Wn.2d 558, 563-64, 789 P.2d 745 (1990) 7
Hous. Auth. of Seattle v. Silva, 94 Wn. App. 731, 734, 972 P.2d 952 (1999) 7
Leda v. Whisnand, 150 Wn. App. 69, 83, 207 P.3d 468 (2009) 9
State v. Ramer, 151 Wn.2d 106, 113, 86 P.3d 132 (2004) 6

Rules

CR 4 8
CR 52 10
CR 52 and 54 10
CR 54 10
CR 81 8

Other Authorities

Appendix at page 4 8
Appendix at page 7 citing, *Leda*, 150 Wn.App at 81 9
Appendix at page 8 10
Appendix at pages 1 through 11 .... 2, 5
Appendix at pages 4-5 9
Appendix at pages 4-6 7
Appendix at pages 5-6 9
CP 1-6 4
CP 30 4
CP 34-36 .... 4, 5
CP 4 & 35 4
CP 79-83 .... 3, 5

I. INTRODUCTION

Petitioner Stanley Maynor ("Mr. Maynor") seeks review of an opinion of the Court of Appeals, Division I. The Court of Appeals affirmed a King County Superior Court judge's decision (on revision) in an unlawful detainer action between Mr. Maynor and Seattle Housing Authority ("SHA") after Mr. Maynor defaulted in his obligation to pay rent. The revision affirmed a decision of a court commissioner who examined the parties and determined that there was no material issue of fact or law in controversy whether Mr. Maynor was in unlawful detainer status, and that SHA was entitled to regain possession of the property under the unlawful detainer laws of RCW 59.12 and 59.18 *et. seq.*

At the show cause hearing the commissioner entered an Order finding that Mr. Maynor was in unlawful detainer status and directed the clerk of the court to issue a writ of restitution after Mr. Maynor admitted that he failed to pay rent when due and failed to pay rent within the period identified in the statutory notice.

II. IDENTITY OF RESPONDENT

Respondent Seattle Housing Authority ("SHA") is a public body corporate and politic authorized by RCW 35.82.010 *et seq.* SHA owns and operates a number of apartment buildings, including the unit formerly occupied by Mr. Maynor in a building commonly referred to as Stewart Manor that is part of SHA's low income public housing program.

Mr. Maynor was a participant in SHA's low income public housing program and a tenant in SHA's Stewart Manor apartment building.

III. COURT OF APPEALS DECISION

Mr. Maynor seeks review of the Unpublished Opinion of the Court of Appeals in its Case No. 76553-1-I. The Unpublished Opinion was filed on July 30, 2018. A copy of the Unpublished Opinion is in the Appendix at pages 1 through 11.

IV. SUMMARY

On October 13, 2016, SHA issued Mr. Maynor a statutory notice to pay or vacate. After Mr. Maynor failed to pay and failed to vacate within the time stated in the statutory notice, SHA commenced this action, filing and serving Mr. Maynor with a summons and complaint: service was by alternative service (authorized by the unlawful detainer statutes). At a show cause hearing on December 19, 2016, King County court commissioner, Henry Judson, examined the parties and found Mr. Maynor in unlawful detainer status and entered an order stating the same. The Order also directed the clerk of the court to issue a writ of restitution. The Order acknowledged that because of the lack of personal service on Mr. Maynor, SHA was not entitled to a monetary judgment.

Mr. Maynor filed a Motion for Revision in Superior Court and Superior Court Judge John Ruhl, entered new findings of facts and conclusions of law finding that Mr. Maynor was, in fact, in unlawful

detainer status and that there was no material issue of fact or law in controversy. CP 79-83. Mr. Maynor filed an appeal in Division I seeking to overturn both the commissioner's order and Judge Ruhl's order. The Court of Appeals affirmed Judge Ruhl's findings.

Mr. Maynor now seeks review of the case in the Supreme Court, claiming that the court's review of whether a commissioner can preside over a show cause hearing is a matter of "first impression." Mr. Maynor failed to address that Judge Ruhl reviewed the case on revision and found Mr. Maynor in unlawful detainer status. Neither the appellate court nor the Supreme Court would review the commissioner's findings after a judge reviewed the commissioner's decisions and upheld the same.

Mr. Maynor did not claim that SHA or the court violated the requirements of the unlawful detainer statutes of RCW 59.12 and 59.18, *et. seq.* but instead, makes claims that the court erred by failing to apply rules and procedures not related to the unlawful detainer action. Mr. Maynor's pleadings failed to address the requirements of the unlawful detainer statutes and failed to state a defense to SHA's action.

V. SHA'S STATEMENT OF ISSUES

A. Should the Supreme Court deny review of an opinion affirming that Mr. Maynor was in unlawful detainer status when he remained in possession of the unit after he failed to pay the rent when due and failed to pay as required by the statutory notice?

B. Should the Supreme Court deny review of an opinion affirming that defendant was in unlawful detainer status based upon defendant's misunderstanding of the process under which Washington unlawful detainer statutes operate?

VI. STATEMENT OF THE CASE

On October 13, 2016, SHA issued Mr. Maynor a statutory notice to pay or vacate. CP 4 & 35. After Mr. Maynor failed to pay and failed to vacate within the time stated in the notice, SHA commenced this action with the filing and service of a summons and complaint, serving Mr. Maynor by alternative service. CP 1-6. Mr. Maynor's submittal to the court prior to the show cause hearing indicated that he had not paid the outstanding rent. CP 30. At the hearing on December 19, 2018, King County Court Commissioner, Henry Judson examined the parties: SHA's witness testified that rent remained unpaid after the statutory notice was issued and Mr. Maynor admitted that he failed to pay the rent and the court found Mr. Maynor in unlawful detainer status and entered an order stating the same. CP 34-36. The Order also directed the clerk of the court to issue a writ of restitution. The judgment entered acknowledged that because of the lack of personal service on Mr. Maynor, SHA was not entitled to a monetary judgment. CP 34-36.

Mr. Maynor filed a Motion for Revision in superior court and Superior Court Judge John Ruhl, entered new findings of facts and

conclusions of law finding that Mr. Maynor was in unlawful detainer status and that the eviction was lawful and upheld. CP 79-83.

Mr. Maynor filed an appeal in Division I seeking to overturn both the Commissioner's Order and Judge Ruhl's Order. The Court of Appeals affirmed the Superior Court's findings. A copy of the Unpublished Opinion is in the Appendix at pages 1 through 11.

Mr. Maynor now seeks review of the case claiming that the issue of whether a court commissioner is authorized by law to preside over an unlawful detainer action at a show cause hearing is a case of first impression that should be reviewed by the Supreme Court. Mr. Maynor failed to address that Judge Ruhl reviewed the case on revision and found him in unlawful detainer status. Neither the Appellate Court nor the Supreme Court would review the commissioner's findings after a judge reviewed and denied revision of the commissioner's order.

VII. ARGUMENT

A. Mr. Maynor's request for review based upon the question of whether a commissioner may preside over a show cause hearing in an unlawful detainer action is neither a question of first impression, nor is it unsettled.

1. <u>If granted, the Supreme Court would not review the commissioner's findings: Settled law requires that the court review the findings of the judge on revision.</u>

Commissioners' rulings are "subject to revision by the superior court." RCW 2.24.050. "On revision, the superior court reviews both the commissioner's findings of fact and conclusions of law de novo based upon the evidence and issues presented to the commissioner." *State v. Ramer*, 151 Wn.2d 106, 113, 86 P.3d 132 (2004). Once the superior court makes a decision on revision, the appeal is from that decision. *Id.* This court therefore reviews the superior court's ruling, not the commissioner's. *Faciszewski v. Brown*, 185 Wn.2d 1040, §10 and footnote 2; 386 P.3d 711 (2016).

The unpublished opinion by the appellate court thoroughly examined and dismissed Mr. Maynor's claim that a court commissioner is not vested with the authority to preside over a hearing. See, Appendix at pages 4-6.

Notwithstanding, it is well-settled law, as discussed above, that the court would not review the commissioner's findings, but instead, would review the findings and order that were entered after a de novo review by a superior court judge as required by RCW 2.24.050. Because the court would not address the commissioner's findings, Mr. Maynor's primary request for review based upon an issue of "first impression" is incorrect and the court should deny his request for review.

2. Defendant's pleadings have consistently misstated and misapplied the rules applicable to unlawful detainer actions.

The unlawful detainer act and the Residential Landlord Tenant Act create a special, summary proceeding for the recovery of possession of real property. *Hous. Auth. of Seattle v. Silva*, 94 Wn. App. 731, 734, 972 P.2d 952 (1999) . In order to take advantage of this process, a landlord must comply with the requirements of the statute. *Hous. Auth. of City of Everett v. Terry*, 114 Wn.2d 558, 563-64, 789 P.2d 745 (1990) .

Mr. Maynor does not claim that SHA or the court failed to comply with the unlawful detainer statutes: Instead, he argues that he was entitled to greater notice and due process afforded by various Civil Rules not applicable to unlawful detainer statutes. He fails to understand that as a summary proceeding, the unlawful detainer statutes of RCW 59.12 & 59.18 *et. seq*, govern the process, and where any conflicts arise between the Civil Rules and the rules for a special proceeding, the rules for the special proceeding prevail. CR 81.

Mr. Maynor submits that SHA's service of process pursuant to RCW 59.18.055 was not effective, claiming a right to personal service pursuant to CR 4, yet he failed to cite any authority showing that service pursuant to RCW 59.18.055 is invalid. The court of appeals affirmed that proper service was complete. See, Appendix at page 4.

Mr. Maynor challenges the commissioner's powers (which are not at issue upon appeal as more fully discussed above in Section A). The appellate court dismissed his challenge by citing the applicable law. See, Appendix at pages 4-5.

Mr. Maynor states that because he disagreed with the termination, and because he challenged the calculations of rent due, there is a case in controversy. Mr. Maynor fails to recognize that the issue of whether he is in "unlawful detainer status" was settled when SHA established that he was in arrears in rent and did not pay as required by the statutory notice. Mr. Maynor's arguments do not change the fact that he was in "unlawful detainer status" as defined by RCW 59.18.030. See, Appendix at pages 5-6.

Mr. Maynor raises other claims that he did not receive due process of law. Under the unlawful detainer statutes, a defendant is entitled to the due process provided in the statute, including the right to be heard. *Leda v. Whisnand*, 150 Wn. App. 69, 83, 207 P.3d 468 (2009). The appellate court found that Mr. Maynor received the due process required in an unlawful detainer action and aptly noted that, "[t]he opportunity to be heard is distinct from the right to a full trial. It is undisputed that a defendant at a show cause hearing 'is not entitled to a full trial.'" See, Appendix at page 7 citing, *Leda*, 150 Wn.App at 81.

The appellate court addressed the remainder of Mr. Maynor's appeal regarding insufficient process based upon CR 52 and CR 54, asserting that SHA failed to provide to him, five days' in advance of a trial, a proposed order. The appellate court found both CR 52 and 54 inapplicable, since the order was not entered after a trial upon contested issues of material fact. The court also dismissed the application of these

civil rules as inconsistent with RCW 59.18.380, and therefore not applicable pursuant to CR 81. See, Appendix at page 8.

VIII. CONCLUSION

Based upon the above discussion, SHA requests that the Petition for Discretionary Review be denied

December 3, 2018.

Respectfully submitted,

Linda J. Brosell, WSBA No. 22260
Attorney for Plaintiff/Respondent
190 Queen Anne Ave. N., 5th Floor
Seattle, WA 98109
(206) 615-3315

FILED
SUPREME COURT
STATE OF WASHINGTON
12/3/2018 2:52 PM
BY SUSAN L. CARLSON
CLERK

IN THE COURT OF APPEALS OF THE STATE OF WASHINGTON

HOUSING AUTHORITY OF THE CITY OF SEATTLE, WASHINGTON, a public body corporate and politic, Respondent, v. STANLEY MAYNOR, Appellant.	No. 76553-1-I DIVISION ONE UNPUBLISHED OPINION FILED: July 30, 2018

BECKER, J. — In December 2016, the Seattle Housing Authority evicted appellant Stanley Maynor from an apartment in South Seattle. Maynor appeals the orders leading to that eviction. We affirm.

The Housing Authority began eviction proceedings in October 2016 after Maynor breached his lease by nonpayment of rent. Maynor was served with a 14 day notice to pay rent or vacate on October 13, 2016, through a notice posted on his door. Maynor remained in possession of the unit. On November 7, the Housing Authority filed a complaint for unlawful detainer and an eviction summons and on November 9, the Housing Authority filed a motion and certificate for order to show cause why a writ of restitution should not be issued.

According to a declaration from a process server, several unsuccessful attempts were made to serve Maynor at his residence with the eviction

the court's jurisdiction. Negash v. Sawyer, 131 Wn. App. 822, 825-27, 129 P.3d 824 (2006).

The show cause hearing was held on December 19, 2016, before a King County Superior Court commissioner. The Housing Authority's property manager, Martha Owens, testified that Maynor failed to pay his rent on time. She quantified the amount of back rent that was due as well as the various costs incurred by the Housing Authority for conducting the eviction. Maynor was present at the hearing. He did not dispute that he was behind in his rent.

Based on documents in the file, the commissioner concluded service of the summons and complaint had been done properly. At the end of the hearing, the commissioner issued findings of fact, conclusions of law, and an order that found Maynor guilty of unlawful detainer and called for a writ of restitution to restore possession of the unit to the Housing Authority. The writ of restitution was issued on the same day. The commissioner entered a judgment summary for the Housing Authority as creditor and Maynor as debtor. The summary listed $669 as the principal judgment amount, $890 in attorney fees and costs, and other expenses, but all these items were designated "Reserved." Conclusion of law 1 stated, "This court has jurisdiction over the property but because of alternative service, does not have personal jurisdiction in this case." Conclusion of law 3 stated, in accordance with RCW 59.18.055, that "plaintiff is not entitled to the amounts identified in the summary until the court has personal jurisdiction over the Defendant." So far as the record reflects, the court never entered

conclusions, and orders entered by the commissioner and adopted by the superior court are void.

Maynor cites a statute stating that a plaintiff, at the time of commencing an action for unlawful detainer, may apply to "the judge of the court in which the action is pending" for a writ of restitution. RCW 59.12.090. According to Maynard, the use of the term "judge" shows that a commissioner does not have authority to issue a writ of restitution. He is incorrect. Commissioners have the "power, authority, and jurisdiction, *concurrent with the superior court and the judge thereof*, . . . to hear and determine ex parte and uncontested civil matters of any nature." RCW 2.24.040(9) (emphasis added). Also, as the Housing Authority explains, RCW 59.12.090 does not apply in this residential landlord-tenant dispute.

Under the King County Local Rules, an order to show cause in an unlawful detainer action can be obtained ex parte. The initial hearing on an order to show cause is to be "heard in person in the Ex Parte and Probate Department," except that contested proceedings are to be set for a trial and assigned to a judge.

> The orders to show cause, and any agreed orders or orders that do not require notice, shall be obtained by presenting the orders, through the clerk's office, to the Ex Parte and Probate Department, without oral argument. The initial hearing on order to show cause shall be heard in person in the Ex Parte and Probate Department, *provided that contested proceedings may be referred by the judicial officer to the clerk who will issue a trial date and a case schedule and will assign the case to a judge.*

KCLR 40.1(b)(2)(O) (emphasis added). Maynor contends that the show cause hearing on December 19 was a contested proceeding that should have been referred to a judge for trial.

The commissioner heard the initial show cause hearing as provided by KCLR 40.1. It was undisputed that Maynor was behind on his rent. Maynor argued that alternative service should not be permitted. But as discussed above, RCW 59.18.055 authorizes the alternative service that was used by the Housing Authority. Making an unfounded argument about the law does not transform a show cause hearing into a contested proceeding.

At the hearing on his motion to revise, Maynor argued that the show cause hearing was contested because he disputed the amounts the Housing Authority claimed he owed. The superior court judge addressed this argument and determined that the show cause hearing was not contested as to any material fact:

> The commissioner has the authority to issue an order in uncontested matters, and for purposes of that statement, uncontested means matters in which there is no reasonable dispute of any fact. Here, there is no dispute that an insufficient amount of money had been tendered by the defendant to the Housing Authority. And if there's no disagreement about that, then there's no dispute. And that triggers the commissioner's authority at that point to go ahead and issue an order if there is no dispute of any material fact. . . . And although Mr. Maynor disputes that he owes any money beyond what he's paid, there is no dispute that what he offered was insufficient to cure an untimely, as well as insufficient to cure the default. So the commissioner did have the authority to hear this case. It was uncontested because there was no dispute of serious—of material fact regarding the elements that the Housing Authority had to file—had to prove.

The superior court was correct. It would have been pointless to refer the case for a trial before a judge since there were no contested material facts.

Due Process

At minimum, a defendant subject to an action for unlawful detainer must be afforded a meaningful opportunity to be heard. Leda v. Whisnand, 150 Wn. App. 69, 83, 207 P.3d 468 (2009). Maynor alleges that the Housing Authority violated due process by concealing from him the nature of the December 19 show cause hearing. According to Maynor, that hearing was transformed into a "faux" trial on the merits. He says it was a "charade" and a "debacle" because he was prevented from exercising his "right to subpoena witnesses, his right to file a jury demand, his right to cross examine and his right to a real judgment." He says the trial court infringed his right to procedural due process by "rendering judgment against him without any prior notice and without any opportunity to be heard." This argument lacks merit. The 14 day notice and the eviction summons advised Maynor of the procedure for contesting eviction. The complaint for unlawful detainer set forth the relief sought. Maynor filed an answer to the complaint. There is no substance to Maynor's claim that he lacked notice of what the show cause hearing would entail.

The opportunity to be heard is distinct from the right to a full trial. It is undisputed that a defendant at a show cause hearing "is not entitled to a full trial. Moreover, it is well established that due process does not require that a defendant in an unlawful detainer action be allowed direct and cross-examination of parties and witnesses at the show cause hearing." Leda, 150 Wn. App. at 81 (citations omitted). Maynor was allowed to argue at the show cause hearing, he was free to present evidence, and he was given an opportunity to cross-examine

the Housing Authority's witness. Maynor received a meaningful opportunity to be heard to the extent required under Leda.

Five Day Notice of Orders and Factual Findings

Maynor contends the commissioner erred by entering "judgment" notwithstanding the fact that the Housing Authority did not provide five days' notice of the proposed judgment, findings of fact, and conclusions of law that were presented at the hearing on December 19. Maynor contends such notice is required by CR 52 and CR 54.

Unlawful detainer actions governed by RCW 59.18 are "special statutory proceedings with the limited purpose of hastening recovery of possession of rental property." Phillips v. Hardwick, 29 Wn. App. 382, 386, 628 P.2d 506 (1981). Court rules do not apply when inconsistent with rules or statutes applicable to special proceedings. CR 81. At a show cause hearing, "if it shall appear that the plaintiff has the right to be restored to possession of the property, the court shall enter an order directing the issuance of a writ of restitution." RCW 59.18.380. The civil rules requiring five days' notice of a proposed judgment do not apply because they are inconsistent with the statute's mandate for expeditious action restoring the premises to a prevailing plaintiff.

Furthermore, CR 52 and CR 54 presuppose that a trial has occurred in which disputed issues of fact were resolved. Here, there was no trial because there were no contested issues of material fact. Maynor wished to contest the amounts the Housing Authority claimed he owed, but because of the use of alternative service, this dispute was not properly before the commissioner. The

commissioner reserved judgment on the claim for moneys owed until such time as the court had in personam jurisdiction.

Execution of the Writ

Maynor contends the writ of restitution was prematurely executed in violation of CR 62(a), which provides that "'no execution shall issue upon a judgment nor shall proceedings be taken for its enforcement until the expiration of 10 days after its entry.'"

Maynor does not explain how CR 62 can apply to an eviction. The eviction was done pursuant to a writ of restitution, not in proceedings taken to enforce an ordinary judgment. A judgment for restitution of the premises is to be enforced immediately. RCW 59.18.410.

But even if CR 62 has application, the writ of restitution was issued on December 19. The sheriff executed the writ on December 29, ejecting Maynor from the premises. Ten days passed between the issuance and execution of the writ. Thus, there is no basis for this claim.

Attorney Fees

The Housing Authority requests reasonable attorney fees under RCW 59.18.290, a section of the Residential Landlord-Tenant Act of 1973. An award of costs and attorney fees under RCW 59.18.290 is discretionary. Council House, Inc. v. Hawk, 136 Wn. App. 153, 159, 147 P.3d 1305 (2006). Exercising our discretion, we decline to award attorney fees.

No. 76553-1-I/10

Affirmed.

Becker, J.

WE CONCUR:

Leach, J.

Schindler, J.

FILED
COURT OF APPEALS DIV I
STATE OF WASHINGTON
2018 JUL 30 AM 9:12

SEATTLE HOUSING AUTHORITY

December 03, 2018 - 2:52 PM

Transmittal Information

Filed with Court:	Supreme Court
Appellate Court Case Number:	96433-5
Appellate Court Case Title:	Housing Authority of the City of Seattle, Washington v. Stanley Maynor
Superior Court Case Number:	16-2-27151-1

The following documents have been uploaded:

- 964335_Briefs_20181203145114SC595082_9691.pdf
  This File Contains:
  Briefs - Plaintiffs Reply Brief
  The Original File Name was MAYNOR_Pltf_Resp_REPLY BRIEF.pdf
- 964335_Other_20181203145114SC595082_6079.pdf
  This File Contains:
  Other - APPENDIX
  The Original File Name was MAYNOR_Appendix_Unpublished Opinion.pdf

A copy of the uploaded files will be sent to:

- xyz39@comcast.net

Comments:

Sender Name: Janet Brazill - Email: janet.brazill@seattlehousing.org
Filing on Behalf of: L. J. Brosell - Email: lbrosell@seattlehousing.org (Alternate Email: linda.brosell@seattlehousing.org)

Address:
c/o Office of the General Counsel
190 Queen Anne Ave. North
Seattle, WA, 98109
Phone: (206) 615-3315

Note: The Filing Id is 20181203145114SC595082

SEATTLE HOUSING AUTHORITY

December 03, 2018 - 2:52 PM

Transmittal Information

Filed with Court:	Supreme Court
Appellate Court Case Number:	96433-5
Appellate Court Case Title:	Housing Authority of the City of Seattle, Washington v. Stanley Maynor
Superior Court Case Number:	16-2-27151-1

The following documents have been uploaded:

- 964335_Briefs_20181203145114SC595082_9691.pdf
  This File Contains:
  Briefs - Plaintiffs Reply Brief
  The Original File Name was MAYNOR_Pltf_Resp_REPLY BRIEF.pdf
- 964335_Other_20181203145114SC595082_6079.pdf
  This File Contains:
  Other - APPENDIX
  The Original File Name was MAYNOR_Appendix_Unpublished Opinion.pdf

A copy of the uploaded files will be sent to:

- xyz39@comcast.net

Comments:

Sender Name: Janet Brazill - Email: janet.brazill@seattlehousing.org
Filing on Behalf of: L. J. Brosell - Email: lbrosell@seattlehousing.org (Alternate Email: linda.brosell@seattlehousing.org)

Address:
c/o Office of the General Counsel
190 Queen Anne Ave. North
Seattle, WA, 98109
Phone: (206) 615-3315

Note: The Filing Id is 20181203145114SC595082