

FILED
SUPREME COURT
STATE OF WASHINGTON
11/19/2018 3:00 PM
BY SUSAN L. CARLSON
CLERK

No. 96437-8

IN THE SUPREME COURT OF
THE STATE OF WASHINGTON

Court of Appeals No. 76542-6-I

THE LAW FIRM OF KALLIS & ASSOCIATES, P.C., AND THE LAW
OFFICE OF BUSTAMANTE & GAGLIASSO, P.C.,

Respondents,

vs.

JOSEPH P. PADGETT,

Petitioner.

ANSWER TO PETITION FOR REVIEW BY THE LAW OFFICE OF
BUSTAMANTE & GAGLIASSO, P.C. WITH REQUEST FOR
SANCTIONS PURSUANT TO RAP 18.9(a)

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WSBA No. 26038
WAID LAW OFFICE, PLLC
5400 California Ave. S. W., Ste D
Seattle, Washington 98136
Counsel for Respondent The Law
Office of Bustamante & Gagliasso,
P.C.

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I. IDENTITY OF RESPONDENT

The Law Office of Bustamante & Gagliosso, P.C., respondent, files this Answer to the Petition for Review. As the Petition for Review reports [p. 2], co-respondent The Law Office of Kallis & Associates, P.C. filed Chapter 7 bankruptcy.¹ The Trustee of that bankruptcy estate may choose to join in this Answer.

II. REJOINDER TO ASSIGNMENTS OF ERROR

1. Whether the Court should deny petitioner's request for judicial notice?
2. Whether the underlying, unpublished decision by the Court Appeals, which found petitioner's appeal frivolous, presents an issue of substantial public interest that warrants review by this Court?
3. Whether the underlying, unpublished decision by the Court Appeals, which found petitioner's appeal frivolous,² presents a significant question of law under the Constitution that warrants review by this Court?
4. Whether the imposition of frivolous appeal sanctions by the Court of Appeals in this case conflicts with a decision of this Court or a published decision of the Court of Appeals?

¹ The petitioner may have violated the automatic bankruptcy stay pursuant to 11 USCA §362 by filing his petition for review against The Law Office of Kallis & Associates, P.C. without having first obtained a Bankruptcy Court order granting him relief from the automatic stay. Denial of review may moot further proceedings related to that issue.

² Petitioner has not sought review of the appellate court's affirmation of the trial court order imposing sanctions against him.

5. Whether the Court should impose sanctions against petitioner for having filed a frivolous petition for review in this Court?

III. REJOINDER TO THE STATEMENT OF THE CASE

Respondent relies upon the statement of facts set forth in the unpublished Opinion issued by Division I. *Law Firm of Kallis & Assoc., P.C. v. Padgett*, 2018 WL 3853576 (08/13/18). Respondent twice served petitioner Padgett, personally, with subpoenas, the first of which had been issued by the Clerk of the King County Superior Court in KCSC Case no. 16-2-21788-5 SEA. *Id.* at * 1, 2; Resp. Appendix, CP 6-10. (Respondent served Padgett, personally, because Padgett’s attorney had not entered an appearance. CP 29 ¶¶22, 26. Respondent also objects to petitioner’s argumentative representations of legal contentions [pp. 5-10] as purported “undisputed facts.”

IV. ARGUMENT

A. The Court Should Deny Petitioner’s Request for Judicial Notice and Strike All References to the Materials Submitted in Violation of the Rules.

Petitioner asked the Court to take judicial notice of pleadings from a California trial court case and based part of his Statement of the Case on those pleadings. Pet. for Review, pp. 3-4, 17; Pet. Appendix pp. 24-43. However, the record on review consists of the report of the underlying

trial court proceedings, the clerk's papers, and exhibits. RAP 9.1(a). The Clerk's Papers, in turn, consist of the pleadings, orders and other papers filed with the trial court clerk. RAP 9.1(c). Furthermore, all statements of fact must include an appropriate reference to the record on review. RAP 13.4(c)(6); RAP 10.3(a)(5). RAP 9.11 further limits a party's ability to unilaterally add evidence to the record on review which the trial court did not consider. And finally, the appellate courts "cannot, while deciding one case, take judicial notice of records of other independent and separate judicial proceedings even though they are between the same parties."

Spokane Research & Defense Fund v. City of Spokane, 155 Wn. App. 89, 98, 117 P.3d 1117 (2005), quoting, *In re: Adoption of B.T.*, 150 Wn.2d 409, 415, 78 P.3d 634 (2003); accord, *Yousoufian v. Office of Ron Sims*, 168 Wn.2d 444, 469-470, 229 P.3d 735 (2010); *King County v. Cent. Puget Sound Growth Mgmt. Hearings Bd.*, 142 Wn.2d 543, 549 n. 6, 14 P.3d 133 (2000).

Petitioner's Appendix pp. 24-43 consists of materials that are not part of the record on review and which petitioner submitted in violation of

the Rules of Appellate Procedure.³ The Court should therefore deny petitioner's request for judicial notice of the California trial court pleadings referenced in the Petition for Review and strike all references to those documents from the Petition.

B. The Petition Does Not Present a Significant Issue of Law Under the Washington Constitution that Warrants Review Under RAP 13.4(b)(3).

Washington Const. art. IV §6 provides that Washington superior courts “shall ... have original jurisdiction in all cases and of all proceedings in which jurisdiction shall not have been by law vested exclusively in some other court.” *Ralph v. State Dep't of Nat. Res.*, 182 Wn.2d 242, 252, 343 P.3d 342 (2014);⁴ accord, *In re Marriage of McDermott*, 175 Wn. App. 467, 481, 307 P.3d 717 (2013). Washington superior courts thus exercise “universal original jurisdiction, leaving the legislature to carve out from that jurisdiction the jurisdiction of ... any other inferior courts that may be created.” *Id.*, quoting *Moore v. Perrott*, 2 Wash. 1, 4, 25 P. 906 (1891).

³ The additional documents are also irrelevant because a decision by the California Court does not excuse Padgett's disregard of the King County Superior Court subpoenas.

⁴ The Petition for Review (p. 14) misquoted Art. IV §6 (“... in which jurisdiction shall **not** have been vested exclusively in some other court”).

Petitioner nevertheless asserts [Pet., pp. 13-15] that jurisdiction of the California Court precluded the King County Superior Court from exercising jurisdiction over the conduct of Mr. Padgett’s Washington deposition because “the King County Superior Court had no authority to assume jurisdiction over the discovery processes of the California Superior Court.” Petitioner turns the jurisdictional issue on its head.

More specifically, the National Conference of Commissioners on Uniform State Laws adopted the Uniform Interstate Depositions and Discovery Act (“UIDDA”) in 2007. Washington adopted the UIDDA effective in June 2012. RCW 5.51. As of this writing, 38 other States, the District of Columbia, and the U.S. Virgin Islands have adopted the UIDDA.⁵ RCW 5.51.050, identical to UIDDA §6 for all purposes relevant here, provides that:

An application to the court for a protective order, or to enforce, quash, or modify a subpoena issued by a clerk of court under RCW 5.51.020 **must comply with the rules or statutes of Washington⁶ state and be submitted to the court in the county**

⁵ Source: [www.uniformlaws.org/Act.aspx?title=Interstate Depositions and Discovery Act](http://www.uniformlaws.org/Act.aspx?title=Interstate%20Depositions%20and%20Discovery) on November 18, 2018.

⁶ UIDDA §6 provides: “An application to the court for a protective order or to enforce, quash, or modify a subpoena issued by a clerk of court under Section 3 must comply with the rules or statutes of this state and be submitted to the court in the [county, district,

in which discovery is to be conducted. [Emphasis added].

RCW 5.51.050 thus explicitly contemplates the exercise of subject matter jurisdiction by the Washington courts over issues such as those posed by the petitioner related to his deposition in Washington. The case law thus uniformly holds that litigation over the subpoena issued to Mr. Padgett must take place here in Washington. See, *Phoenix Grantor Trust v. Exclusive Hospitality, LLC*, 2018 WL 2709549 *5 (Supreme Ct., Queens Cnty. NY 06/05/18)(Litigation pending in New York; discovery to be conducted in New Jersey). *In re: Aerco Int'l, Inc.*, 964 N.Y.S.2d 900, 903-905, 40 Misc.3d 571 (2013)(Litigation pending in New Jersey; discovery to be conducted in New York); *Gibsonburg Health, LLC v. Miniet*, 2018 Ohio, 3510, 2018 WL 4189570 *2 (Ohio App. 08/31/18) (Litigation pending in Ohio; discovery to be conducted in New York); *DeSalle v. Wal-Mart Stores, Inc.*, 2016 Ohio 5096, 70 N.E.3d 185, 195 (Ohio App. 2016)(Litigation pending in Connecticut; discovery to be conducted in Ohio). Thus, “[j]udicial review of the subpoena process occurs only when there is an objection to the subpoena or a need for _____ circuit, or parish] in which discovery is to be conducted.”

enforcement,”⁷ and that judicial review occurs only in the jurisdiction in which the discovery is to be conducted—in this case, Washington.

The Petition for Review thus does *not* present a “significant question of law” under the Washington Constitution; indeed, petitioner’s theory directly conflicts with Washington Constitution, art. IV §6.

C. The Petition Does Not Present an Issue of Substantial Public Interest Warranting Review Under RAP 13.4(b)(4).

Petitioner represents that he “has found not one published decision which provides an interpretation of any [of] its [*i.e.*, the UIDDA’s] provisions.” Pet. for Review, p. 12. He nevertheless insists that the Petition for Review presents “a case of first impression with national implications.” An absence of case law under a uniform statute adopted by so many States and after so many years would strongly suggest the similar absence of an issue of substantial public concern. Although Petitioner is mistaken about the lack of authority under the UIDDA, the existing case law unanimously contradicts petitioner’s thesis.⁸

Moreover, RAP 13.4(b)(4) approves the Court’s review of issues which involve “substantial public interest that should be determined by the Supreme Court.” To determine the degree of public interest involved, the

⁷ Quoting, *Gibsonburg Health*, *supra* at *2.

⁸ See, pp. 4-6, *supra*.

Court considers: “(1) the public or private nature of the question presented, (2) the desirability of an authoritative determination for the future guidance of public officers, and (3) the likelihood of future recurrence of the question.” *In re: Combs*, 182 Wn.2d 1015, 353 P.3d 631 (Comr’s Mem. 2015); *State v. Watson*, 155 Wn.2d 574, 122 P.3d 903 (2005)(“potential to affect every sentencing hearing. . .invites unnecessary litigation. . .and creates confusion generally”).

None of those factors support review in this case. Instead, petitioner Padgett received and ignored two deposition subpoenas, including one which had been issued by the King County Superior Court Clerk.⁹ RCW 5.51.050 and UIDDA §6 authorized Mr. Padgett to challenge the subpoenas through a motion to quash or to seek a protective order pursuant to CR 26(c) and/or 45(c)(3). He chose to instead flaunt the authority of the Washington Court based on his mistake of law.

The Petition for Review thus fails to raise any issue of public interest, let alone an issue of “significant” public interest.

D. No Conflict Exists Between the Court of Appeals Imposition of Sanctions and a Decision of This Court that Warrants Review Under RAP 13(b)(1).

Division I found Mr. Padgett’s appeal frivolous because it raised

⁹ Petitioner refers to the subpoenas as “counterfeit,” even though no evidence supports his inflammatory suggestion of forgery of the Court Clerk’s official signature.

“no debatable issues upon which reasonable minds might differ and [was] devoid of merit. 2018 WL 3853576 *5. Petitioner nevertheless asserts the propriety of review RAP 13.4(b)(1) because Washington appellate courts may not impose sanctions pursuant to RAP 18.9(a) in the absence of “[s]ome bad or improper intent.” Pet. for Review, p. 18. RAP 18.9(a) imposes no such requirement of proving subjective, bad intent.

RAP 18.9(a) instead authorizes the imposition of sanctions against a party who “files a frivolous appeal.” Neither the express terms of RAP 18.9(a) nor any of the cases¹⁰ cited by petitioner require a finding of “bad or improper intent” (although the use of “these rules for purposes of delay” provides an additional basis on which an appellate court can impose sanctions under RAP 18.9). Indeed, adding a requirement that the appellate court make a finding of “some bad or improper intent” would change the existing, objective standard into a subjective standard focused on the appellant’s intent rather than whether the appeal raised a reasonably debatable issue.¹¹

¹⁰ Petitioner cited the following cases: *Reid v. Dalton*, 124 Wn. App. 113, 100 P.3d 339 (2004); *Green River Community Coll. Dist. 10 v. Higher Educ. Personnel Bd.*, 107 Wn.2d 427, 730 P.2d 653 (1986); *Tiffany Family Trust Corp. v. City of Kent*, 155 Wn.2d 225, 119 P.3d 325 (2005), and; *Fay v. Northwest Airlines*, 115 Wn.2d 194, 796 P.2d 412 (1990). None of those case conditioned imposition of RAP 18.9(a) sanctions on a finding of “some bad or improper intent.”

¹¹ CR 11 similarly applies an objective standard to an attorney’s inquiry. See, *Bryant v. Joseph Tree, Inc.*, 119 Wn.2d 210, 220, 829 P.2d 1099 (1992). Petitioner’s theory is also reminiscent of the “empty head/pure heart” defense to Rule 11 sanctions rejected by the federal courts. See, e.g., *Smith v. Ricks*, 31 F.3d 1478, 1488 (9th Cir. 1994) (“Counsel can

Here, petitioner explained that his appeal “raised two primary issues. . .which are the same two raised by this petition.” Pet. for Review, p. 16. As should be apparent from the discussion above, petitioner’s appeal of those “two primary issues” was indeed frivolous.

The Petition for Review thus does not demonstrate any conflict between the standards established by Washington case law applying RAP 18.9(a) and the appellate court’s imposition of sanctions against Mr. Padgett in the underlying appeal.

E. The Court Should Impose Sanctions on Petitioner for Having Filed a Frivolous Petition for Review.

An appellate court may impose terms or compensatory damages against a party who files a frivolous appeal. See discussion, *supra*, p.9-10. RAP 18.9(a) applies to the Petition for Review in this Court. RAP 1.1(d).

Here, the trial court imposed sanctions against Mr. Padgett. Division I affirmed the trial court’s imposition of sanctions and awarded sanctions against Mr. Padgett for having filed a frivolous appeal in violation of RAP 18.9(a). Mr. Padgett nevertheless filed a Petition for Review in this Court in which he concedes that he has urged the same two

no longer avoid the sting of Rule 11 sanctions by operating under the guise of a pure heart and empty head.”); accord, *Lopez v. Stages of Beauty, LLC*, 307 F. Supp. 3d 1058, 1074 (S.D. Cal. 2018)

issues that prompted Division I to impose sanctions against him. Moreover, Division I was correct; indeed, Mr. Padgett's theory in the Court of Appeals and this Court directly conflicts with the express terms of RCW 5.51.050 and would result in a violation of Washington Constitution art. IV §6.

The Court should therefore impose additional sanctions against Mr. Padgett for having caused Respondent to incur additional time and expense in filing this Answer in this Court.

V. CONCLUSION

The Court of Appeals found Mr. Padgett's appeal frivolous and imposed sanctions against him. His petition for review does not meet any RAP 13.4(b) standard for review by this Court; indeed, his assertion that it does is frivolous. Respondent The Law Office of Bustamante & Gagliasso, P.C. therefore requests that the Court deny the Petition for Review and impose additional sanctions against Mr. Padgett, pursuant to RAP 18.9 and order that he pay those sanctions within ten (10) days of the award becoming final.

DATED: November 19, 2018.

WAID LAW OFFICE, PLLC

BY: /s/ Brian J. Waid

BRIAN J. WAID
WSBA No. 26038

5400 California Ave. SW, Suite D
Seattle, Washington 98136
Telephone: 206-388-1926
Email: bjwaid@waidlawoffice.com
Attorney for Respondent The
Law Office of Bustamante &
Gagliasso, P.C.

PROOF OF SERVICE

I hereby certify that on this 19th day of November, 2018, I caused a copy of the foregoing Answer to Petition for Review on behalf of Respondent The Law Office of Bustamante & Gagliasso, P.C. to be delivered to Petitioner in the manner indicated below:

Petitioner:	<input checked="" type="checkbox"/> U.S. Mail
Joseph Padgett	<input type="checkbox"/> Hand Delivery
35538 SE 41 st St.	<input type="checkbox"/> Email
Fall City, Washington 98024	<input checked="" type="checkbox"/> ECF Delivery

Dated: November 19, 2018.

WAID LAW OFFICE, PLLC

BY: /s/ Brian J. Waid
BRIAN J. WAID
WSBA No. 26038
Attorney for Respondent The
Law Office of Bustamante &
Gagliasso, P.C.

APPENDIX: CP 6-10

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16 SEP 12 AM 9:00

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Issued by the

KING COUNTY SUPERIOR COURT

KING COUNTY
SUPERIOR COURT CLERK
SEATTLE, WA

KING COUNTY
SUPERIOR COURT CLERK
E-FILED

CASE NUMBER: 16-2-21788-5 SEA

SUBPOENA IN A CIVIL CASE

The Law Firm of *KALLIS* & Associates, P.C. and The Law Office Of Bustamante & Gagliasso, P.C., Plaintiffs
v.

Joseph P. Padgett, Defendant

CAUSE NUMBER:

TO: Joseph P. Padgett

YOU ARE COMMANDED to appear at the place, date, and time specified below to testify at the taking of a deposition in the above case. The Deposition will be stenographically recorded and may be recorded by digital video and audio recording equipment.

PLACE OF DEPOSITION: Central Reporting 1700 7th Ave., Seattle WA

DATE AND TIME: October 13, 2016 at 9:30 A.M.

YOU ARE COMMANDED to produce and permit inspection and copying of the following documents or tangible things at the place, date, and time specified below (list documents or objects):

PLACE	DATE AND TIME

YOU ARE COMMANDED to appear in the above captioned court at the place, date, and time specified below to testify in the above case.

PLACE OF TESTIMONY	COURTROOM	DATE AND TIME

Barbara Miner, Clerk of the Superior Court
For King County, WA
By N. CAMPBELL Deputy

ISSUING OFFICER'S NAME, ADDRESS AND PHONE NUMBER

¹ Any organization not a party to this suit that is subpoenaed for the taking of a deposition shall designate one or more officers, directors, or managing agents, or other persons who consent to testify on its behalf, and may set forth, for each person designated, the matters on which the person will testify. (CRLJ 26.)

PROOF OF SERVICE

The Law Firm of Kallis & Associates, P.C. and The Law Office Of Bustamante & Gagliasso, P.C.

v.

Joseph P. Padgett

DATE SERVED _____ PLACE of SERVICE _____

SERVED ON (PRINT NAME)

MANNER OF SERVICE

SERVED BY (PRINT NAME)

TITLE

DECLARATION OF SERVER

I declare under penalty of perjury under the laws of the State of Washington that the foregoing information contained in the Proof of Service is true and correct.

Executed on _____/_____/2016
DATE of SERVICE

PLACE WHERE SERVED

SIGNATURE OF SERVER

ADDRESS OF SERVER

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16 SEP 20 PM 2:46

KING COUNTY
SUPERIOR COURT CLERK
SEATTLE, WA

IN THE SUPERIOR COURT, IN AND FOR THE COUNTY OF KING, STATE OF WASHINGTON

**THE LAW FIRM OF KALLIS & ASSOCIATES, P.
C. A WASHINGTON CORPORATION; ET AL.**
Plaintiff/Petitioner

Cause No.: **16-2-21788-5 SEA**
Hearing Date: **10/13/2016**

vs.

JOSEPH P. PADGETT, AN INDIVIDUAL; ET AL
Defendant/Respondent

**DECLARATION OF SERVICE OF
SUBPOENA IN A CIVIL CASE; DEPOSITION SUBPOENA
FOR PERSONAL APPEARANCE AND PRODUCTION OF
DOCUMENTS AND THINGS; NOTICE OF DEPOSITION OF
PLAINTIFF JOSEPH P. PADGETT**

The undersigned hereby declares: That s(he) is now and at all times herein mentioned was a citizen of the United States, over the age of eighteen, not an officer of a plaintiff corporation, not a party to nor interested in the above entitled action, and is competent to be a witness therein.


On the **18th day of September, 2016 at 6:45 PM** at the address of **35538 SE 41ST ST, FALL CITY, King County, WA 98024**; this declarant served the above described documents upon **JOSEPH P. PADGETT** by then and there personally delivering 1 true and correct copy(ies) thereof, by then presenting to and leaving the same with **JOSEPH P. PADGETT, Who accepted service, with identity confirmed by verbal communication, a black-haired white male approx. 45-55 years of age, 5'10" -6'0" tall and weighing 200-240 lbs..**

No information was provided or discovered that indicates that the subjects served are members of the United States military.

Service Fee Total: **\$ 79.50**

Declarant hereby states under penalty of perjury under the laws of the State of Washington that the statement above is true and correct.

DATED 9/19/2016



Eric Traina, Reg. # 307327, King

ORIGINAL PROOF OF SERVICE

PAGE 1 OF 1

Tracking #: 0013388064



For: Kallis & Associates
Ref #: Padgett WA Subpoena



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16 SEP 26 AM 10:28

KING COUNTY
CLERK
SEATTLE, WA

IN THE SUPERIOR COURT, IN AND FOR THE COUNTY OF KING, STATE OF WASHINGTON

**THE LAW FIRM OF KALLIS & ASSOCIATES, P.
C.; ET AL.**

Plaintiff/Petitioner

vs.

JOSPEH P. PADGETT

Defendant/Respondent

Cause No.: **16-2-21788-5 SEA**

Hearing Date: **10/13/2016**

**DECLARATION OF SERVICE OF
SUBPOENA IN A CIVIL CASE**

The undersigned hereby declares: That s(he) is now and at all times herein mentioned was a citizen of the United States, over the age of eighteen, not an officer of a plaintiff corporation, not a party to nor interested in the above entitled action, and is competent to be a witness therein.

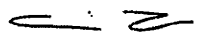
On the **21st day of September, 2016 at 12:46 PM** at the address of **35538 SE 41ST STREET, FALL CITY, King County, WA 98024**; this declarant served the above described documents upon **JOSPEH P. PADGETT** by then and there personally delivering **1 true and correct copy(ies)** thereof, by then presenting to and leaving the same with **JOSPEH P. PADGETT, Who accepted service, with identity confirmed by verbal communication, a black-haired white male approx. 45-55 years of age, 5'10" -6'0" tall and weighing 200-240 lbs..**

No information was provided or discovered that indicates that the subjects served are members of the United States military.

Service Fee Total: **\$ 79.50**

Declarant hereby states under penalty of perjury under the laws of the State of Washington that the statement above is true and correct.

DATED 9/23/2016



Eric Traina, Reg. # 307327, King

ORIGINAL PROOF OF SERVICE

PAGE 1 OF 1



For: Kallis & Associates
Ref #: PADGETT, JOSEPH - B

Tracking #: 0013442078



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17 JAN -6 PM 2:12
KING COUNTY
SUPERIOR COURT CLERK
SEATTLE, WA

IN THE SUPERIOR COURT, IN AND FOR THE COUNTY OF KING, STATE OF WASHINGTON

THE LAW OFFICE OF BUSTAMANTE & GAGLIASSO, P.C.
Plaintiff/Petitioner

vs.
JOSEPH P. PADGETT
Defendant/Respondent

Cause No.: **16-2-21788-5 SEA**
Hearing Date: **01/13/2017**

DECLARATION OF SERVICE OF
SUBPOENA IN A CIVIL CASE

The undersigned hereby declares: That s(he) is now and at all times herein mentioned was a citizen of the United States, over the age of eighteen, not an officer of a plaintiff corporation, not a party to nor interested in the above entitled action, and is competent to be a witness therein.

On the **4th day of January, 2017 at 5:45 PM** at the address of **35538 SE 41ST STREET, FALL CITY, King County, WA 98024**; this declarant served the above described documents upon **JOSEPH P. PADGETT** by then and there personally delivering 1 true and correct copy(ies) thereof, by then presenting to and leaving the same with **JOSEPH P. PADGETT, Who accepted service, with identity confirmed by verbal communication, a gray-haired white male approx. 45-55 years of age, 6'0"-6'2" tall and weighing 200-240 lbs..**

No information was provided or discovered that indicates that the subjects served are members of the United States military.

Service Fee Total: \$ 129.50


Declarant hereby states under penalty of perjury under the laws of the State of Washington that the statement above is true and correct.

DATED 1/5/2017

Eric Traina

Eric Traina, Reg. # 307327, King

ORIGINAL PROOF OF SERVICE
PAGE 1 OF 1

 For: Kallis & Associates
Ref #: PADGETT

Tracking #: 0014948792


WAID LAW OFFICE

November 19, 2018 - 3:00 PM

Transmittal Information

Filed with Court: Supreme Court
Appellate Court Case Number: 96437-8
Appellate Court Case Title: The Law Firm of Kallis & Associates., P.C., et ano. v. Joseph Padgett
Superior Court Case Number: 16-2-21788-5

The following documents have been uploaded:

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