IN THE SUPREME COURT OF THE STATE OF WASHINGTON

SUPREME COURT NO. 97124-2

(Court of Appeals, Div. I, No. 77740-8-I)

(Whatcom County Court Case No. 16-4-00659-4)

In Re the Estate of:

MARGARET RAI-CHOUDHURY

Deceased.

KHASHON HASELRIG, Petitioner,

vs.

STEPHANIE INSLEE, Personal Representative, Respondent.

PERSONAL REPRESENTATIVE'S ANSWER TO HASELRIG'S PETITION FOR REVIEW

Douglas R. Shepherd
Heather C. Shepherd
Shepherd and Allen
2011 Young Street, Ste 202
Bellingham, WA 98225
(360) 733-3773

June 28, 2019

TABLE OF CONTENTS

TABLE OF AUTHORITIES

Cases

Washington State Supreme Court

Washington State Court of Appeals

Other Jurisdictions

Statutes

Rules and Regulation

I – IDENTITY OF RESPONDENT

Respondent is Stephanie Inslee, in her capacity as Personal Representative to the Estate of Margaret Rai-Choudhury (Inslee).

II – RESTATEMENT OF THE CASE

Decedent Margaret Rai-Choudhury (Margaret) executed her Will (Will) on July 21, 2015. CP 20. She died on November 25, 2016. CP 8. Margaret was survived by her daughter, Indira Rai-Choudhury (Indira), and Indira's children, including Khashon Haselrig (Haselrig).

Except for $10,000.00 left to Linda Borland, Margaret's Will left fifty percent (50%) of her estate to University of British Columbia (UBC) for scholarships to Canadian medical students with financial need and an expressed desire to serve the poor. CP 13. The remaining fifty percent (50%) was left to petitioner Haselrig. *Id.* Due to the last paragraph in section 2.2 of the Will, Haselrig was to receive all but $10,000.00 of the Estate.[1] *Id.*

[1] "Accordingly, only for the purposes of determining the residuary distribution, if a beneficiary receives an amount outside of probate through a nonprobate distribution, that amount will be added to the total assets in my probate estate and that beneficiary's distribution of probate assets will be proportionately smaller than those beneficiaries who did not receive a nonprobate distribution. For example, in the event I had a life insurance policy of $10,000 naming "A" as a beneficiary and "A" and "B" were equal beneficiaries under my residuary clause with a net probate estate of $90,000, then "A" would receive the life insurance of $10,000 plus $40,000 from the probate estate and "B" would receive $50,000 from the probate estate." CP 13.

Margaret's probate estate exceeded $600,000. Her non-probate assets exceeded $1,000,000. UBC was the payable on death beneficiary of two Wells Fargo accounts valued at $1,058,504.87 and $113,817.17. CP 148; CP 154.

When Margaret hired attorney Steven Avery (Avery) to prepare her Will, she had recently filed for dissolution from Prosenjit Rai-Choudhury (Prosenjit). CP 60. Margaret advised Avery she was adamant no family members, including Prosenjit, Indira, or Haselrig have any powers over her person, property or estate. CP 60.

Avery prepared several important legal documents consistent with Margaret's instructions including her Last Will, Durable Power of Attorney for Health Care, Durable Power of Attorney, and Health Care Directive and Supplement. CP 64; CP 74; CP 90; CP 102. All were executed by Margaret in July of 2015, while her dissolution action was pending.

The Powers of Attorney and Directive documents were consistent with Margaret's Will. These additional documents named Inslee as Margaret's attorney-in-fact, gave Inslee broad powers, and protected Inslee from Margaret's family and heirs. In one of the directives, Margaret expressly prohibited Prosenjit and Indira from making any

decisions related to Margaret's person, care, or taking any action related to her. *Id.*

Between July of 2015 and the date of Margaret's death, Avery was not asked to change, modify, draft or destroy any of the four executed documents, including the Will. CP 61. Avery was never asked by Margaret to revoke or destroy her 2015 Will. *Id.*

On December 8, 2016, Avery and Indira began communicating regarding Margaret's estate. CP 119; CP 61. Between December 9 and December 12, 2016, Indira repeatedly requested Avery and Inslee take action on a probate that had not yet been opened, to apparently protect Margaret's estate. CP 62; CP 108. On December 12, 2016, Avery informed Indira the Will had named Inslee as PR, the original Will had not been located, Avery was in the process of obtaining the necessary affidavits and he would be opening a probate as soon as possible with a copy of the Last Will prepared by Avery. CP 62. At all times material hereto, Avery was advised Haselrig, an adult, lived with his mother Indira in Edmond, Oklahoma. CP 116; CP 120.

Unable to locate the original Will, Avery, who was in possession of a true and correct copy of Margaret's Will, had a duty to obtain the necessary affidavits and file the Will in Whatcom County Superior Court. RCW 11.20.010; CP 1; CP 3; CP 5. The probate pleadings advised the

probate court and the beneficiaries the Will being probated was a copy. CP 1. Avery asked the probate court to establish or refuse to establish the Will. RCW 11.20.020. In initially admitting the Will, the probate court made the following findings and orders:

> The original will has not yet been located. However, the Affidavit of Witnesses of Steven D. Avery, Amanda Dykstra and Melissa Sophusson, dated December 13, and 16, 2016 constitutes all of the testimony submitted in support of the Last Will and Testament of decedent. . . . The offered Will is established as decedent's Last Will and is admitted to probate: . . . The Affidavit[s] . . . in support of Decedent's Will is certified as adequate to prove such Will.

CP 29.

On December 19, 2016, the Will was filed for probate. CP 11. When offered on December 19, 2016, the probate court was required to take proof, by affidavit, of the execution and validity of the Will, after notice to interested persons. RCW 11.20.070. Prior notice was given to Indira and Haselrig that Avery was seeking admission of the copy Will, and would be filing the probate upon receiving the appropriate affidavits. CP 62.

On January 7, 2017, Avery e-mailed Haselrig copies of all pleadings filed in the probate, including the required notice, and asked Haselrig if he would like copies by mail. CP 63; CP 117.

On January 18, 2017, Borland, Haselrig, UBC and Indira were provided copies of the Notice of Withdrawal and Substitution for new counsel, as well as the Notice of Appointment of Personal Representative and Pendency of Probate. CP 44.

On January 23, 2017, Haselrig appeared in this action through counsel Lisa Saar (Saar). CP 50. On January 25, 2017, Haselrig moved the trial court to convert the probate into an intestate probate, to remove Inslee as PR, and to be granted nonintervention powers. CP 55. In part, Haselrig argued the copy of the Will did not establish, by clear, cogent and convincing evidence, that the Will was not intentionally revoked. *Id.*

On February 7, 2017, Avery, under oath, provided the following facts to the probate court. At Margaret's instruction, Avery prepared her Will, her Durable Power of Attorney for Health Care, her Durable General Power of Attorney, and her Health Care Directive and Supplement. CP 59. The documents were signed by Margaret on July 21, 2015. *Id.* Before preparing the documents and witnessing their execution, Avery met with Margaret four (4) times. *Id.* The documents were consistent with Margaret's instructions, wishes and intentions. *Id.* Margaret instructed Avery that Indira should have no portion of her estate, and should be given no authority or power over Margaret or Margaret's estate. CP 60.

At no time after July 21, 2015, did Avery receive instructions or information from Margaret about changes, modifications or destruction of any of the above four documents, including the Will. CP 61.

The Will was witnessed by Sophusson and Dykstra. Both declared under penalty of perjury that Margaret appeared to be of sound mind and under no duress or undue influence. CP 3; CP 5; CP 59; CP 88; CP 479; CP 493. The other three documents were notarized by Avery, who stated under oath that Margaret's signature was her free and voluntary act. The other witnesses again declared that Margaret had the appropriate capacity and was not acting under any duress or undue influence. CP 59; CP 87; CP 88; CP 90; 99; CP 106; CP 107.

On February 10, 2017, Indira joined in Haselrig's motion(s). CP 129. If Haselrig's motion(s), and Indira's joinder were successful, Haselrig would have received nothing from Margaret's estate, and Indira would have received the entire Estate by intestate succession. In her Joinder, Indira also alleged she had not been timely or properly notified of probate proceedings. CP 130. Indira provided the probate court a January 6, 2017, letter from Indira's attorney to Avery, wherein Indira's attorney stated the Will offered contained "several off bequests that further support the decedent's mental illness." CP 134. Clearly, as of January 6, 2017,

Haselrig and Indira, were aware of the probate and the terms and conditions of the Will.

On February 10, 2017, after the initial decision, and written objections by Haselrig and his mother Indira, the probate court took additional written evidence and heard argument from counsel for Inslee, Indira, and Haselrig.[2] RCW 11.20.070; CP 58; CP 136; 02/10/2017 RP.

On February 10, 2017, at a hearing where both Haselrig and Indira appeared through counsel, the probate court made the following findings and decisions:

> 01. Proof of the execution and validity, including its contents and authenticity, of the July 21, 2015, Last Will and Testament of Margaret Rai-Choudhury, has been proven by clear, cogent, and convincing evidence, by and through the following:
>
> a. A copy of the Last Will and Testament of Margaret Rai-Choudhury, which was executed consistent with RCW 11.20.020;
>
> b. Affidavit of Attesting Witness (Steve Avery), filed December 19, 2016;
>
> c. Affidavit of Attesting Witness (Melissa Sophusson), filed December 19, 2016;
>
> d. Affidavit of Attesting Witness (Amanda Dykstra), filed December 19, 2016;
>
> e. Declaration of Steve Avery, filed February 7, 2017;
>
> f. Second Affidavit of Amanda Dykstra - Attesting Witness, filed February 7, 2017; and,
>
> g. Second Affidavit of Melissa Sophusson - Attesting Witness, filed February 7, 2017.

---

[2] After Margaret's death, Indira, living out of state, wrote to Avery as follows: "when are you going to change the locks on the house because somebody has been in the house and opened the safe and taken all the documents out of the safe." 02/10/2017 RP 14. It would be appropriate for the probate court to conclude that Indira, the only person to gain from a lost will, had entered Margaret's home, entered Margaret's safe, and was aware of documents being removed from the safe.

> 02. No evidence has been submitted to this Court that the July 21, 2015, Will was lost or destroyed under circumstances such that the loss or destruction had the effect of revoking the will.
>
> 03. The July 21, 2015, Last Will and Testament of Margaret Rai-Choudhury should be admitted to probate.
>
> 04. The Letters Testamentary, granted to Stephanie Inslee on December 19, 2016, should not be revoked.
>
> 05. There is no cause shown for removal of Stephanie Inslee as Personal Representative of the Estate.
>
> 06. The further relief requested in the motion should be denied.
>
> IT IS HEREBY ORDERED, ADJUDGED AND DECREED THAT: Haselrig's Motion for Removal of PR of Estate, Appoint New PR; Revocation of Testate Probate; and Issue Order, be, and hereby is, denied.

CP 136-38. The above February 10, 2017, Findings and Order were not appealed by Haselrig.

On March 20, 2017, Indira filed a Will Contest action under Whatcom County Superior Court Cause No. 17-2-00481-9 (Will Contest). Appendix C; CP 507. On May 18, 2017, Inslee, as PR, moved in the Will Contest action for partial summary judgment and sanctions on causes of action (1), (2) and (4) above. CP 156. Inslee also asked for attorney fees and costs pursuant to CR 11 and RCW 4.84.185. CP 166.

Contained within and attached thereto, in support of Indira's responsive pleadings, was a supportive Declaration of Khashon Haselrig, filed in the Will Contest. CP 175; CP 206.

On June 19, 2017, more than four months after the probate court's ruling denying Haselrig's motion for removal of the personal

representative, Haselrig filed his Motion to Void Fraudulent Admission of Copy Will, Removal of Personal Representative, Obtain Full Accounting and Impose Sanctions. CP 244. Haselrig argued he was "[r]obbed of notice of pendency [and] I was unable to raise my objections." CP 248.

On July 19, 2017, Haselrig filed his Addendum to: Motion to Void Fraudulent Admission of Copy Will, Removal of Personal Representative, Obtain Full Accounting and Impose Sanctions. CP 276. Haselrig's caption in that pleading included attorneys Doug Shepherd, Heather Shepherd, Bethany Allen, and Steven Avery as defendants. In that pleading Haselrig made allegations against counsel for Inslee, and attempted to name them as parties in the probate. *Id.* Haselrig alleged Steven Avery, Douglas Shepherd, Heather Shepherd and Bethany Allen, were involved in efforts "to enrich themselves by way of fraud," and the attorneys for Margaret and her Estate, including the undersigned attorney were involved in knowing and intentional misconduct damaging to the public and the legal profession. CP 276. Further, Haselrig argued the Estate's counsel "flawlessly" lied to the probate court. CP 278.

On August 22, 2017, Haselrig filed a Motion to Strike Defendants' Responses and Receive Default Judgment in Favor of Plaintiff's Motion to Void Fraudulent Admission of Copy Will, Removal of Personal Representative, Obtain Full Accounting and Impose Sanctions. CP 336.

In that pleading, Haselrig requested "barring Shepherd & Allen from any further pleadings and entering a default judgment in accordance with the relief sought in the motion filed by the plaintiff over two months ago on June 20th 2017." *Id.*

On August 25, 2017, Judge Raquel Montoya-Lewis entered two orders. In her first order, Judge Montoya-Lewis determined that:

1. Haselrig's above two pleadings contain the wrong caption.
2. Haselrig is not the plaintiff in this probate action.
3. Stephanie Inslee, Doug Shepherd, Heather Shepherd, Bethany Allen and Steven Avery are not defendants in the probate action;
4. Washington law does not allow Haselrig to make any due process claims against Stephanie Inslee, Heather Shepherd, Doug Shepherd, Bethany Allen or Steven Avery in this matter.
5. Washington procedural law, including CR 6 and CR 59(b), does not allow this Court to reconsider the Order of February 10, 2017, as the above pleadings were filed and served more than ten (1) days after February 10, 2017.
6. Haselrig SHALL NOT file any more pleadings in this matter, listing himself as a plaintiff and/or Doug Shepherd, Heather Shepherd, Bethany Allen and Steven Avery as defendants.

CP 389.

In her second order, Judge Montoya-Lewis determined Haselrig's motion to void fraudulent admission of copy will "is not well grounded in fact or law, and should be denied in its entirety." CP 394. Further, Judge Montoya-Lewis determined that Haselrig's June 19, 2017, motion, which again sought to invalidate Margaret's Will and proceed intestate, should be and was denied. CP 393.

On September 20, 2017, Inslee filed her Motion for Judicial Determination, asking the probate court to determine whether Haselrig's pleadings, motions and arguments, as a matter of law, violated the no contest clause in Margaret's Will. CP 407.

On October 10, 2017, Haselrig filed [his] Counter Motion for Removal of Stephanie Inslee and All Associates Pursuant to RCW 11.28.250, and to Deny PR's Motion for Judicial Determination. CP 437.

In support of that counter-motion, Haselrig filed a Declaration of Prosenjit Rai-Choudhury, his grandfather and Margaret's ex-husband. CP 448.

On November 3, 2017, the trial court determined that:

> 01. The pleadings filed by, and arguments made by, Khashon Haselrig, repeatedly contested and attempted to invalidate the Decedent's Last Will and Testament.
> 02. Margaret Rai-Choudhury's Last Will and Testament, contained a No Contest Clause.
> 03. The pleadings filed by, and arguments made by, Khashon Haselrig, violate the No Contest provision of Decedent's Last Will.
> 04. Pursuant to the No Contest Clause, Khashon Haselrig is barred from receiving any property belonging to Decedent's Estate.

CP 471. Haselrig also seeks review of the November 3, 2017, Order on Judicial Determination of Will Contest.

Apparently, Haselrig also (untimely) asks this Court to review and reverse the trial court's and the appellate court's (Division 1) probate

decisions because he allegedly did not have sufficient notice. Division I, in an unpublished decision, stated:

> Khashon's argument that RCW 11.20.070 was violated and that the will was improperly admitted to probate was considered by the trial court and rejected in its February 10, 2017 order. "[I]f a party contests the admission of the will to probate, generally that same party may not file a later will contest. The party's only remedy is to appeal the order admitting the will." Black, 153 Wn.2d at 170. Khashon did not appeal that order. It became final. "A final order from which no appeal is taken becomes the law of the case." Tornetta v. Allstate Ins. Co., 94 Wn. App. 803, 809, 973 P.2d 8 (1999). We therefore decline to consider Khashon's arguments that the will was improperly admitted to probate.

Matter of Estate of Rai-Choudhury, 7 Wn.App.2d 1052, 2, Not Reported (Div. 1, 2019). The order was not appealed.

Haselrig argues this Court should review and reverse the probate court and the appellate court (Division 1) decisions because Haselrig never contested the will, and therefore enforcement of the "No Contest Clause" was error. Division 1 stated:

> Khashon cites In re Estate of Little, 127 Wn. App. 915, 920, 113 P.3d 505 (2005) in support of his argument that he did not initiate a will contest. In Little, unnamed heirs who were not notified of the decedent's death moved the court to appoint a new administrator six years after the estate was closed. Id. at 918-19. The appellate court declined to apply the limitations period in the will contest statutes, reasoning that this action was more akin to the law of vacating judgments. Id. ("The heirs have not yet brought a will contest and the trial court has therefore had no occasion to apply the law that governs will contests."). But, this case is more like Finch than Little. Like the physician in Finch, Khashon sought to invalidate a lost

> will prior to the closure of probate, so his motion must be considered a will contest regardless of its label.

Id. at 3.

III – LEGAL AUTHORITY AND ARGUMENT

A. Standard to Accept Petition for Review.

> A petition for review will be accepted by the Supreme Court **only**:
>
> (1) If the decision of the Court of Appeals is in conflict with a decision of the Supreme Court; or
>
> (2) If the decision of the Court of Appeals is in conflict with another decision of the Court of Appeals; or
>
> (3) If a significant question of law under the Constitution of the State of Washington or of the United States is involved; or
>
> (4) If the petition involves an issue of substantial public interest that should be determined by the Supreme Court.

RAP 13.4(b) (emphasis added).

B. Due Process.

> The fundamental requisites of due process are "the opportunity to be heard," and "notice reasonably calculated, under all the circumstances to apprise interested parties of the pendency of the action and afford them an opportunity to present their objections," Thus, "at a minimum" the due process clause of the Fourteenth Amendment demands that a deprivation of life, liberty or property be preceded by "notice and opportunity for hearing appropriate to the nature of the case." Moreover, this opportunity "must be granted at a meaningful time and in a meaningful manner.

Matter of Deming, 108 Wn.2d 82, 96, 736 P.2d 639 (1987) (internal citations omitted).

"Procedural due process requires notice and an opportunity to be heard 'at a meaningful time and in a meaningful manner.' The process

due depends on what is fair in a particular context." *In re Detention of Morgan*, 180 Wn.2d 312, 320, 330 P.3d 774 (2014) (citations omitted).

The probate court has not deprived Haselrig of rights or benefits. Haselrig's motions asked the Court to invalidate the very document which gives him any rights as a beneficiary.

Haselrig was provided multiple opportunities to be heard and present his objections to the Will. The probate court heard his objections, and ruled against them. Haselrig challenged the validity of Decedent's Last Will in multiple pleadings, hearings and declarations. Inslee, by clear, cogent and convincing evidence, proved its validity. The February 10, 2017, Order was not appealed. Haselrig's untimely motion(s) to again invalidate Decedent's Last Will, were denied.

C. Notice and Opportunity to Be Heard.

Haselrig argues fundamental fairness and equity required the probate court to determine Margaret destroyed her Will with the intent that Haselrig get nothing and Indira get everything. This has to be the first time a beneficiary before a Washington court has argued that he wanted the probate court to conclude he should get nothing, and because the court did not so rule, he was treated unfairly and equity was ignored.

Haselrig's appeal relies on *In re Elliott's Estate*, 22 Wn.2d 334, 156 P.2d 427 (1945). However, a clear reading of the law of the case in

Elliott supports the decisions of the probate court and not the arguments of Haselrig.

> To give effect to a testator's will, the instrument must, of course, first be admitted to probate, and, where the testator has made more than one will, the last will is the one which must be given effect as the latest and final expression of the decedent's testamentary wishes if such result can be obtained within the established rules of law.

In re Elliott's Estate, 22 Wn.2d at 351.

Haselrig also incorrectly argues *Hesthagen v. Harby*, 78 Wn.2d 934, 481 P.2d 483 (1971) supports his petition. *Hesthagen* is not on point. It is a jurisdiction case. The petitioners in that action were heirs who were never notified in any manner of a probate action before the assets of the probate were distributed and the probate was closed.

Haselrig was repeatedly notified. CP 43. After notice, Haselrig participated, either through counsel or pro se, in every proceeding. Attorney Saar appeared on Haselrig's behalf on January 23, 2017. CP 50. In his appearance, Haselrig raised no issue of personal jurisdiction. On January 23, 2017, Haselrig requested notice of all proceedings and asked for an inventory. CP 52; CP 54.

Beginning January 25, 2017, Haselrig began filing a number of pleadings and motions contesting the Will. CP 55. On March 24, 2017,

Indira's attorney, Coppinger-Carter, substituted as counsel for Haselrig.[3] A party to an action, who appears "through his authorized attorney, waived the [personal] jurisdiction objection by failure to raise the defense in accordance with Rule of Pleading, Practice and Procedure 12." *Sanders v. Sanders*, 63 Wn.2d 709, 715, 388 P.2d 942 (1964).

By asking the probate court to determine Margaret's Will should not be admitted to probate, requesting Margaret's estate be administered intestate, and arguing Haselrig should be appointed Margaret's PR, Haselrig clearly waived any argument regarding personal jurisdiction. *State v. Norlund*, 31 Wn.App. 725, 726, 644 P.2d 724 (Div. 1, 1982) *rev. denied* 98 Wn.2d 1013. At the February 10, 2017, hearing Haselrig made no personal jurisdiction argument. 02/10/2017 RP.

Haselrig argues that his due process rights were violated because he was not given notice prior to the opening of Decedent's probate on December 19, 2016. RCW 11.20.070 states that lost or destroyed wills may be established as valid provided "notice to all persons interested having been first given." Neither notice, nor the manner of notice is defined. "The purpose of notice statutes is to ensure due process for a nonmoving party and to allow that party to respond intelligently." *In re*

[3] Although attorney Coppinger-Carter initially appeared for Indira, and then substituted as counsel for Haselrig on March 24, 2017 while continuing to represent Indira, Haselrig believed her to be acting as his attorney because Haselrig was apparently acting solely for the benefit of his mother, Indira.

Estate of Reese, 184 Wn.App. 1031, 2 (Unpublished, Div. 2, 2014).[4] Indira and Haselrig live together. Prior to Inslee filing any petition with this Court, Indira and Haselrig were provided notice that the original Will had not been found, and that Avery was working on obtaining affidavits from the witnesses prior to petitioning the probate Court to admit the lost will. Indira indicated by e-mail she and Haselrig had been communicating about the Estate, and that Haselrig lived with her.

D. Will Contest

No contest clauses are valid and enforceable in Washington. *In re Estate of Mumby*, 97 Wn.App. 385, 393, 982 P.2d 1219 (Div. 2, 1999). Haselrig argues he was not contesting his grandmother's Will. "A court may treat a motion as a will contest, even where the petitioner styles it otherwise." *Estate of Finch*, 172 Wn.App. 156, 162, 294 P.3d 1 (Div. 1, 2012). "The authorities generally recognize that in a will contest the issue is the validity of the will." *In re Kane's Estate*, 20 Wn.2d 76, 84, 145 P.2d 893 (1944). "The question presented in a will contest proceeding is whether the paper offered for probate is or is not the testator's valid will." *In re Estate of Eden*, 99 S.W.3d 82, 87 (Tenn. 1995).

[4] The decision has no precedential value, is not binding on any court, and is cited only for such persuasive values as the court deems appropriate. GR 14.1.

"A court may treat a motion as a will contest, even where the petitioner styles it otherwise. See, e.g., In re Estates of Palmer, 146 Wash.App. 132, 137–38, 189 P.3d 230 (2008)." *Estate of Finch*, 172 Wn.App. at 162.

IV – REQUEST FOR ATTORNEY FEES AND EXPENSES

Pursuant to RAP 18.1 and RAP 18.9(a), this Court may order a party who files a frivolous appeal to pay terms, sanctions or compensatory damages to any other party who has been harmed by said frivolous appeal. Inslee asks this Court to exercise its discretion in ordering Haselrig to pay attorney fees for Inslee's response to Haselrig's frivolous appeal. Haselrig's Petition for Review does not have any merit, as Haselrig failed to move to reconsider or appeal the February 10, 2017, Order.

V – CONCLUSION

Haselrig's petition does not raise any ruling by the Court of Appeals that is inconsistent with applicable case law. Haselrig's appeal and petition are frivolous and warrant an award of attorney fees to the Estate pursuant to RAP 18.1 and RAP 18.9(a). Inslee respectfully requests that Haselrig's Petition for Review be denied.

/ / / /

Respectfully submitted this 28th day of June 2019.

SHEPHERD and ALLEN

Douglas R. Shepherd, WSBA # 9514
Heather C. Shepherd, WSBA #51127
2011 Young Street, Suite 202
Bellingham, Washington 98225
(360) 733-3773

DECLARATION OF SERVICE

I, Heather Shepherd, declare that on June 28, 2019, I caused to be served a copy of the following document: **Personal Representative's Answer to Haselrig's Petition for Review** and, this **Declaration of Service**, in the above matter, on the following person, at the following address, in the manner described:

Khashon Haselrig 809 NW 153rd Terrace Edmond, OK 73013 kdoekay@gmail.com	(X) U.S. Mail ( ) Fax ( ) Messenger Service ( ) Hand Delivery ( ) Email (X) COA E-portal

I declare under penalty of perjury under the laws of the state of Washington that the foregoing is true and correct.

DATED this 28th day of June 2019.

Heather Shepherd

SHEPHERD AND ALLEN

June 28, 2019 - 4:11 PM

Transmittal Information

Filed with Court:	Supreme Court
Appellate Court Case Number:	97124-2
Appellate Court Case Title:	In the Matter of the Estate of: Margaret Rai-Choudhury
Superior Court Case Number:	16-4-00659-4

The following documents have been uploaded:

- 971242_Answer_Reply_20190628160818SC930495_9129.pdf
  This File Contains:
  Answer/Reply - Answer to Petition for Review
  The Original File Name was 06-28-19 PRs Answer to Petition for Review.pdf

A copy of the uploaded files will be sent to:

- bethany@saalawoffice.com
- dougshepherd@saalawoffice.com
- kdoekay@gmail.com

Comments:

Sender Name: Heather Shepherd - Email: heather@saalawoffice.com
Address:
2011 YOUNG ST STE 202
BELLINGHAM, WA, 98225-4052
Phone: 360-733-3773

Note: The Filing Id is 20190628160818SC930495