

FILED  
SUPREME COURT  
STATE OF WASHINGTON  
6/11/2019 10:10 AM  
BY SUSAN L. CARLSON  
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June 11, 2019

ATTN: Susan L. Carlson, Clerk/Court Administrator  
Washington State Supreme Court  
415 12<sup>th</sup> Street W.  
Olympia WA 98501

Re: *Colyn v. Standard Parking Corporation*  
*Supreme Court Cause No. 97127-7*  
***Correction to RAP Citation Error in Petition for Review***

Dear Clerk Carlson:

I am lead appellate counsel for Petitioners. I am writing following my review of the Answer to the Petition, concerning a citation error in the Petition.

Respondents correctly state, on page 9 of their Answer (footnote 1) that several times Petitioners incorrectly cite to RAP 2.3(b)(1) and RAP 2.3(b)(4), the rule governing discretionary review of a trial court's interlocutory decision. I take full responsibility for this error. The intent was to cite to RAP 13.4(b)(1), governing review of a decision conflicting with a decision of this Court, and 13.4(b)(4), governing review of an issue of substantial public interest.

I apologize for this error, and any confusion that could result from it as to the intended basis under the RAPs for granting review of the issues raised in the Petition.

Please advise the members of the Department of this error, and provide them with a copy of this letter. If the Court prefers, our office will prepare a corrected Petition replacing the errant cites to RAP 2.3 with corrected cites to RAP 13.4.

Respectfully,

CARNEY BADLEY SPELLMAN, P.S.

Michael B. King #14405  
Michael B. King

cc: counsel of record

**CERTIFICATE OF SERVICE**

The undersigned certifies under penalty of perjury under the laws of the State of Washington that I am an employee at Carney Badley Spellman, P.S., over the age of 18 years, not a party to nor interested in the above-entitled action, and competent to be a witness herein. On the date stated below, I caused to be served a true and correct copy of the foregoing document on the below-listed attorney(s) of record by the method(s) noted:

Via Appellate Portal to the following:

Howard M. Goodfriend Catherine W. Smith Smith Goodfriend, PS 1619 8th Ave N Seattle WA 98109-3007 <a href="mailto:howard@washingtonappeals.com">howard@washingtonappeals.com</a> <a href="mailto:cate@washingtonappeals.com">cate@washingtonappeals.com</a>	David M. Beninger Patricia E. Anderson Luvera Law Firm 701 5th Ave Ste 6700 Seattle, WA 98104-7016 <a href="mailto:david@luveralawfirm.com">david@luveralawfirm.com</a> <a href="mailto:patricia@luveralawfirm.com">patricia@luveralawfirm.com</a>
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DATED: June 11, 2019.



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Patti Saiden, Legal Assistant

# CARNEY BADLEY SPELLMAN

June 11, 2019 - 10:10 AM

## Transmittal Information

**Filed with Court:** Supreme Court  
**Appellate Court Case Number:** 97127-7  
**Appellate Court Case Title:** Thyce W. Colyn and Amy J. Colyn v. Standard Parking Corp.  
**Superior Court Case Number:** 15-2-16945-9

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### Comments:

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