98058-6

Docket No. 77652-5-1

IN THE WASHINGTON COURT OF APPEALS
DIVISION ONE

ELVIRA DAVISON,

Appellant/Cross-Respondent/Plaintiff

v.

KING COUNTY, KING COUNTY SHERIFF'S OFFICE, KING COUNTY DEPARTMENT OF PUBLIC DEFENSE AND KING COUNTY ASSOCIATED COUNSEL FOR THE ACCUSED,

Respondents/Cross-appellants/Defendants

ELVIRA DAVISON'S PETITION FOR DISCRETIONARY REVIEW

Catherine C. Clark
The Law Office of Catherine C. Clark PLLC
2200 Sixth Avenue, Suite 1250
Phone: (206) 838-2528
Fax: (206) 374-3003
Email: cat@loccc.com
Attorneys for Elvira Davison

Table of Contents

Table of Authorities

Cases

Rules

A. IDENTITY OF PETITIONER

Petitioner Elvira Davison seeks review of the decision terminating review set forth in Part B.

B. COURT OF APPEALS DECISION

The Court of Appeals, Division I, issued its unpublished opinion on October 14, 2019, attached as Appendix A.

C. ISSUES PRESENTED FOR REVIEW

Whether this court's ruling in *Dolan v. King County*, 172 Wn.2d 299, 258 P.3d 20 (2011) is a narrow case limited to its facts as was concluded by Division Two of the Court of Appeals in *LaRose v. King County*, 8 Wn. App. 90, 437 P.3d 701 (2019) which approach was followed by Division One in the case below.

Whether this court's ruling in *Dolan*, where it specifically stated "[w]e hold that King County has such a right of control over the defender organizations that they are arms and agencies of the county," is limited to claims for retirement benefits under the state PERS system or, rather, extends the employee status to all employees of the defender associations such that employment law claims against King County by these employees are recognized. *Dolan*, at 322. If not, then Ms. Davison specifically asks this court to so extend *Dolan* to employment law claims.

Whether an unappealed trial court decision, which has not been adopted by any appellate court in any opinion in the State of Washington, has any precedential effect?

D. STATEMENT OF THE CASE

Division I's opinion correctly set forth the basic outline of the facts and procedure in this case. Op. at 2-3. By way of a summary, Ms. Davison was once employed by the Associated Counsel for the Accused a defender association representing indigent criminal defendants in King County (defender association). In May 2013, her employment was terminated for an alleged violation of policies regarding client funds. In March 2014, Ms. Davison was charged with theft in the second degree, a felony. In July 2014, she was arrested and spent three days in jail. In February 2015, the charges against her were dropped.

Ms. Davison filed suit in July 2016 asserting the following claims: violation of her civil rights under 42 U.S.C. § 1983, employment discrimination in violation of Chapter 49.60 RCW, discharge in violation of public policy, negligence, defamation, outrage (intentional infliction of emotional distress) and/or negligent infliction of emotional distress, and malicious prosecution (CP 9-15). In an amended complaint, Ms. Davison added an eighth claim

of a due process violation (CP 505). After a removal to federal court by King County, the court dismissed her §1983 claim and remanded the case back to the trial court. CP 180-189. Through a series of summary judgment motions, the trial court dismissed all of Ms. Davison's claims. CP 764-765; 1161-1163; 2322-2324. In the first motion for summary judgment, the trial court, in its oral ruling, addressed the question of whether *Dolan* applied:

> I'm going to grant in part and deny in part the motion for summary judgment as follows: The first question is, are the defendants, these defendants, liable for the actions that are being alleged? Under *Dolan v. King County*, the Court holds that after Dolan issued in 2011, and before King County began directly providing public defender services, the county can, in fact, be liable for the employment decisions of the nonprofit organizations, because the holding in *Dolan* was that the county exercised such a right of control over those organizations as to make them agencies of the county.

RP 100, Lines 1-11; CP 764-765. The trial court later reversed course and dismissed all of Ms. Davison's claims against the various defendants. Op. p. 3; CP 1161-1163; 2322-2324. Division One affirmed on the sole issue that *Dolan* was limited to its facts and thus, a dismissal was warranted. Op. pp. 6-7. A motion for reconsideration was denied on December 6, 2019.

E. ARGUMENT WHY REVIEW SHOULD BE GRANTED

LaRose and *Davison* conflict with *Dolan.* Review is thus appropriate under RAP 13.4(b)(1) and (4).

1. *Dolan v. King County* is controlling authority—the defender associations are arms of King County

This case involves the application of *Dolan*, where this court held that the defender associations were arms of King County.

In *Dolan,* a public defender employed by one of the various defender associations working on behalf of indigent criminal defendants in King County, brought a class action against it claiming that such employees were entitled to enroll in PERS, the State retirement system for employees of public entities. In an extensive opinion, this court concluded employees of the defender associations met the definition of "employees" under the definition of an employee as stated in RCW 41.40.010(12) which is a part of the PERS legislation.[1]

This court held that the employees of the defender associations were in fact employees of King County "applying

---

[1] The statute provides: ""Employee" or "employed" means a person who is providing services for compensation to an employer, unless the person is free from the employer's direction and control over the performance of work. The department shall adopt rules and interpret this subsection consistent with common law."

[p]ertinent statutes and common law principles." 172 Wn.2d at 299. In so doing, this court engaged in an extensive analysis of the common law definition of "employee" and "independent contractor." The *Dolan* court, in addressing King County's claims that it lacked control over the defender organization, stated:

> The county argues that "[t]he proper focus ... is the County's control over the manner in which *the corporations' attorneys and staff* perform their work." Reply Br. of Pet'r at 4. The county argues that the defenders are free to defend clients without interference and may hire and fire without interference, and that the county does not interfere with the defender groups' day-to-day activities. Thus the county reasons that it merely seeks a result as a principle and does not control the manner in which the independent contractors perform. *Id.* at 21 (citing *Hollingbery*, 68 Wn.2d at 80-81; RESTATEMENT (SECOND) OF AGENCY § 220 (1958)). Under its reasoning, the county could turn its sheriff's department into a nonprofit corporation and because the sheriff generally has authority to hire and fire and carry out police work, the sheriff's department would become an independent contractor. The county is wrong.

(Emphasis in the original). 172 Wn.2d at 318. This court, after engaging a common law analysis, came to the following conclusion:

> We hold that under Washington common law as adopted in RCW 41.40.010(12), the employees of the defender organizations are employees of the county for purposes of PERS.

172 Wn.2d at 320. Thus, this court concluded that based on Washington common law, which was incorporated into RCW 41.40.010(12), that employees of the defender associations such

as Ms. Davison once was, also qualified as employees of King County. This is controlling authority in Washington State.

2. Division Two, in *LaRose v. King County,* and Division One, by following *LaRose* below, attempted, improperly, to limit *Dolan* to its facts

Notwithstanding this court's decision in *Dolan,* Division One, along with Division Two in *LaRose,* concluded that *Dolan* is a limited decision confined to its facts. Division One stated:

> We agree with the *LaRose* court that *Dolan* is a narrow decision confined only to issues of PERS eligibility. It does not compel the conclusion that King County is vicariously liable for ACA's conduct. Notably, under the right of control test relied upon in *Dolan*, King County had no control over and no involvement in ACA's personnel decisions regarding Davison, including her claims for unemployment benefits and for relief through the Equal Opportunity Employment Commission and National Labor Relations Board. Because King County had no control over Davison's termination, it is not vicariously liable for the termination itself or any harm resulting from it.
>
> Nor is King County ACA's successor under *Dolan.* Despite *Dolan*'s broadly written holding, nothing in the decision's reasoning suggests the Supreme Court intended to make King County ACA's successor as a matter of law. Questions of successor liability are distinct from questions of vicarious liability. Aside from *Dolan*, Davison offers no Washington authority to show that a government agency can be the successor to a private corporation. Further, Davison offers no authority establishing that such a successor would be liable for the predecessor's discriminatory or tortious conduct. Consistent with *LaRose, Dolan* is limited to its narrow facts and, thus, is legally distinguishable. It does not

> stand for the proposition that King County is subject to successor liability as a matter of law.

Op. pp. 6-7. These statements conflict with *Dolan*. *See* 172 Wn.2d 318-320.

In *LaRose*, employment claims were brought against King County by a former public defender who had been stalked by an accused criminal she was assigned to defend. Ms. LaRose filed suit claiming violations of WLAD, RCW 49.60, by alleging that her then employer, the Public Defender Association, failed to provide a nonhostile work environment free of harassment and alleged other discriminatory conduct. 8 Wn. App. 2d at 101. Relative to the question of whether *Dolan* governed the relationship between Ms. LaRose and King County, Division Two stated:

> But *Dolan* is not directly applicable here. The court's holding in *Dolan* was limited to the context of retirement benefits eligibility. The court expressly stated that whether a public defender was a County employee for PERS purposes was different than whether the County was vicariously liable for employment discrimination. *Dolan,* 172 Wn.2d at 321.

8 Wn. App. 2d at 722. This is incorrect and contradicts *Dolan*. *See* 172 Wn.2d at 318-320.

Division Two and Division One base *LaRose* and *Davison* on this court's analysis of the asserted affirmative defenses of collateral estoppel and equitable estoppel in *Dolan* at page 321.

There, King County claimed that Mr. Dolan was collaterally estopped from asserting a claim to PERS benefits citing a summary judgment order in a case from the King County Superior Court entitled White v. NDA, No. 94-2-09128-0. There, the King County Superior Court concluded that White was not an employee of King County for purposes of a wrongful termination claim. The *Dolan* court concluded that this trial court decision was not sufficient to establish a collateral estoppel claim by King County. The *Dolan* court did not adopt the trial court ruling in White; rather it ruled specifically to the contrary. 172 Wn.2d at 318-320. Thus, *LaRose* (and Division One below) misconstrues this court's ruling in *Dolan* by implying that the ruling in White was adopted by *Dolan* when this court pointed out that the issue in White was different than that posed in *Dolan* for purposes of collateral estoppel. Division Two in *LaRose* selectively reads *Dolan.* Division One, by relying on *LaRose* in *Davison*, does the same.

This court addressed this potential confusion in its analysis of the equitable estoppel claim asserted by King County in *Dolan*. It stated:

> Perhaps because King County required the defender organizations to give the appearance of being private, the county is arguing the employees cannot now claim to be public employees. But it is difficult to

> understand how the county relied on their private status, or what else the employees should have done. Moreover, accepting the county's argument would elevate form over substance.

Id. at 321-322. This court also unambiguously concluded: "We hold that King County has such a right of control over the defender organizations that they are arms of the county." *Id.* at 322. In its first sentence of the conclusion of the majority opinion, this court affirmed the decision of the trial court that the public defender organization employees were entitled to PERS eligibility through the state retirement system. In the second sentence, quoted above, it held that there was no limitation as to King County's relationship and responsibilities to the employees of the defender organizations. Division Two in *LaRose*, and Division One in *Davison*, ignored these statements and authorities supporting the conclusion in *Dolan*.

The primary danger posed by *LaRose* and by *Davison* is that the two divisions of the Court of Appeals have elevated the trial court decision in White, that employees of the defender associations are not King County employees, to an adopted rule of

law.[2] This they have done despite this court's application of the common law in *Dolan* which led to the holding that employees of the defender associations were also employees of King County. White was not appealed; there is no decision issued by any appellate court in Washington State, reported or unreported, adopting this ruling from White.[3] It is a trial court decision with no precedential effect. *E.g. Estate of Jones*, 170 Wn. App. 594, 605, 287 P.3d 610 (2012) ("Stare decisis is not applicable to a trial court decision ...").

---

[2] This court's discussion of the affirmative defenses in *Dolan* is dicta, at best.

> The word "dicta" means observations or remarks made in pronouncing an opinion concerning some rule, principle, or application of law, or the solution of a question suggested by the case at bar, but not necessarily involved in the case or essential to its determination. *State ex rel. Lemon v. Langlie*, 45 Wn.2d 82, 89, 273 P.2d 464 (1954). Statements that constitute "obiter dictum" need not be followed. *DCR, Inc. v. Pierce County*, 92 Wn. App. 660, 683 n.16, 964 P.2d 380 (1998) (citing *State v. Potter*, 68 Wn. App. 134, 150, 842 P.2d 481 (1992)).

Amalgamated Transit v. State, 142 Wn. 2d 183, 262 n.25, 11 P.3d 762, 809 (2000).

[3] The undersigned has conducted electronic legal research on Lexis using the cause number "94-2-09128-0" assigned to the White case. No documents were found.

Division Two started the problem with *LaRose.* Division One perpetuated the error[4] started in *LaRose* even though it was not obligated to follow it. *In re Arnold,* 190 Wn.2d 136, 410 P.3d 1133 (2018) ("We reject any kind of 'horizontal stare decisis' between or among the divisions of the Court of Appeals ...").

Both Division One below and Division Two in *LaRose* were obligated to follow the ruling in *Dolan* that employees of the defender associations constituted King County employees by the application of the common law of Washington. Division One just recently acknowledged this obligation in *Presbytery of Seattle v. Schulz,* 10 Wn. App.2d 696, 708, 449 P.3d 1077 (2019) ("... vertical stare decisis requires that courts follow decisions handed down by higher courts in the same jurisdiction.").

A further danger posed by *LaRose* and *Davison* is that both Division One and Division Two are stating that *Dolan* is limited to its facts and is a narrow decision with no such statement from this Court. Such a limitation is within the province and powers of this court, not the Court of Appeals. *E.g. City of Lakewood v. Willis*, 186

---

[4] While an unpublished decision, *Davison* may still be cited as persuasive authority. GR 14.1(a).

Wn.2d 210, 375 P.3d 1056 (2016) (declining to limit *Reed v. Town of Gilbert*, ___ U.S. ___, 135 S. Ct. 2218, 192 L. Ed.2d 236 (2015) to its facts); *Bennet v. Shinoda Floral*, 108 Wn.2d 386, 394, 739 P.2d 648 (1987) (limiting *Finch v. Carlton*, 84 Wn.2d 140, 524 P.2d 898 (1974) to its facts); *see also Fast v. Kennewick*, 167 Wn.2d 27, 40, 384 P.3d 232 (2016) ("A Court of Appeals decision has no stare decisis effect on this court.").

Rather, unless and until this court limits *Dolan* to its facts, it is not as a matter of law.

> A decision by this court is binding on all lower courts in the state. When the Court of Appeals fails to follow directly controlling authority by this court, it errs.

(Ciations omitted.) *1000 Va. Ltd. P'ship v. Vertecs*, 158 Wn. 2d 566, 578, 146 P.3d 423, 430 (2006).

F. CONCLUSION

This case presents a critical issue for this court: whether the Court of Appeals may selectively read a case from this court and thus, based on this selective reading, limit such decisions to their facts. The Court of Appeals' selective reading of *Dolan* and its attempts to limit it to its facts in an inappropriate exercise of the powers granted to it. Only this court may limit its cases to its facts. While *Davison* is unpublished, it perpetuates the error of *LaRose.*

This court could have limited *Dolan* to its facts but did not do so. This court should accept review of this case to correct the error below and in *LaRose* by holding that *Dolan* is not limited to its facts and reaffirm what it held in *Dolan*:

> We hold that King County has such a right of control over the defender organizations that they are arms of the county.

Dolan, at 322.

Dated this 6th day of January, 2020.

THE LAW OFFICE OF CATHERINE C. CLARK, PLLC

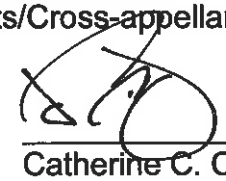
By: _____
Catherine C. Clark, WSBA 21231
Attorneys for Petitioner Elvira Davison

Certificate of Service

The undersigned states under penalty of perjury under the laws of the State of Washington that service of this pleading by e-mail transmission through the Washington State Appellate Court Portal was made this 6th day of January, 2020. on the following counsel of record:

Timothy R. Gosselin
Gosselin Law Office, PLLC
1901 Jefferson Avenue, Suite 304
Tacoma, WA 98402
Email: tim@gosselinlawoffice.com
Attorneys for Respondents/Cross-appellants/Defendants

David Hackett
King County Prosecuting Attorneys Office
516 Third Avenue, W400
Seattle, WA 98104
Email: david.hackett@kingcounty.gov
Attorneys for Respondents/Cross-appellants/Defendants



Catherine C. Clark, WSBA 21231

Appendix A

Davison v. King County, et al.

Docket No. 77652-5-I

FILED
10/14/2019
Court of Appeals
Division I
State of Washington

IN THE COURT OF APPEALS OF THE STATE OF WASHINGTON
DIVISION ONE

ELVIRA DAVISON, Appellant, v. KING COUNTY, KING COUNTY SHERIFF'S OFFICE, KING COUNTY DEPARTMENT OF PUBLIC DEFENSE And KING COUNTY ASSOCIATED COUNSEL FOR THE ACCUSED, Respondent.	No. 77652-5-I UNPUBLISHED OPINION FILED: October 14, 2019

VERELLEN, J. — After nonprofit law firm Associated Counsel for the Accused (ACA) fired Elvira Davison for violating policies regarding client funds, Davison sued King County, the King County Department of Public Defense (DPD), and the King County Associated Counsel for the Accused (KCACA) for employment discrimination and related torts. Although ACA is a separate entity distinct from King County, DPD, or KCACA, Davison sued under a theory of successor liability as a matter of law based on Dolan v. King County.[1] Because the narrow facts in Dolan do not support successor liability as a matter of law for employment

[1] 172 Wn.2d 299, 258 P.3d 20 (2011).

discrimination or other torts, and the record does not support any other theory of successor liability, the trial court properly granted summary judgment on all claims.

Therefore, we affirm.

FACTS

ACA was a private, nonprofit law firm founded in 1973. Under a contract with King County, ACA provided indigent criminal defense and dependency services for the county. ACA employed Davison as a forensic social worker until she was fired on May 30, 2013. That July, the county terminated its contracts with ACA and all other private law firms providing similar services. In November, King County voters passed a county charter amendment authorizing the creation of DPD and its subdivisions. The county began providing all indigent defense services through newly created DPD and its subdivisions, including KCACA. ACA rebranded itself Irving C. Paul Law Group (ICPLG), stopped providing indigent legal services, and began distributing its remaining funds with the intent of dissolving itself.

Davison first filed suit in July of 2016. Her original complaint named King County, the King County Sheriff's Office, DPD, and KCACA as defendants.[2] It did not name ACA or ICPLG as defendants. Davison later filed an amended complaint naming King County, the King County Sheriff's Office,[3] DPD, and "King

---

[2] Clerk's Papers (CP) at 2.

[3] Davison stipulated to dismissal of the King County Sheriff's Office as a defendant during the pendency of this appeal.

County Associated Counsel for the Accused aka Irving C. Paul Law Group" as defendants.[4] Davison asserted that she "worked for [KCACA], originally known as Irving C. Paul Law Group."[5]

The court initially relied on Dolan v. King County[6] to conclude that ACA and King County were the same organization as a matter of law. The court later granted summary judgment and dismissed all of Davison's claims.

Davison appealed. King County[7] cross appealed the court's conclusion that it is a successor to ACA.

ANALYSIS

We review an order granting summary judgment de novo.[8] Summary judgment is appropriate when "there is no genuine issue as to any material fact" and "the moving party is entitled to a judgment as a matter of law."[9] We view the evidence in a light most favorable to the nonmoving party.[10] Because Davison's

---

[4] CP at 493.

[5] CP at 494.

[6] 172 Wn.2d 299, 258 P.3d 20 (2011).

[7] We refer to King County to include agencies DPD and KCACA except where otherwise noted.

[8] Loeffelholz v. Univ. of Wash., 175 Wn.2d 264, 271, 285 P.3d 854 (2012).

[9] CR 56(c); Ranger Ins. Co. v. Pierce County, 164 Wn.2d 545, 552, 192 P.3d 886 (2008) (quoting Locke v. City of Seattle, 162 Wn.2d 474, 483, 172 P.3d 705 (2007)).

[10] Loeffelholz, 175 Wn.2d at 271.

claims depend upon her arguments that King County is a successor in interest to ACA as a matter of law,[11] we begin by considering King County's cross appeal.

King County contends Dolan is "not comparable" to the case here and does not establish its liability either vicariously or as a successor.[12] Dolan held "that [King County] has exerted such a right of control over [ACA and other] defender organizations as to make them agencies of the county."[13] Davison relies on this holding to argue ACA has been an agency of King County since Dolan was decided in 2011 and thus is a successor in interest to ACA. But Dolan is limited to the narrow legal issue it decided.

In Dolan, the court considered whether private law firms contracted to provide indigent defense, such as ACA, were an "arm and agency" of King County solely to determine whether their employees were "public employees" under the Public Employee Retirement System (PERS) statute, RCW 41.40.010(12).[14] The court applied the "right of control" test, which is typically used to determine whether an employment relationship between two parties is that of employer and

---

[11] See Report of Proceedings (RP) (Aug. 25, 2017) at 150-51 (Davison stating that ICPLG does not need to be served as an individual party "because we already have King County" and acknowledging "If [ICPLG] is not considered a part of the county, and they are a separate nonprofit, private entity . . . then the argument that they could be brought in or should be brought in as a separate party should stand."). Notably, at the conclusion of that hearing, the court ruled, "As a matter of law . . . ICPLG is not a separately named defendant in this lawsuit." Id. at 164.

[12] Resp't's Br. at 43.

[13] Dolan, 172 Wn.2d at 320.

[14] Id. at 315.

employee or employer and independent contractor.[15] The court considered the county's degree of control over the law firms' budgeting and operational decisions. On this analysis, the court concluded "the county has exerted such a right of control over the defender organizations as to make them agencies of the county."[16]

Recently in LaRose v. King County,[17] Division Two of this court considered whether Dolan required holding King County vicariously liable for conduct of the Public Defender Association (PDA), an equivalent entity to ACA. The plaintiff, a former PDA employee, argued King County was vicariously liable under Dolan for PDA's alleged violations of the Washington Law Against Discrimination,[18] including hostile work environment, negligence, and discrimination.[19] But "Dolan [was] not directly applicable" because "[t]he court's holding in Dolan was limited to the context of retirement benefits eligibility."[20] The fact-specific nature of the right of control test meant Dolan's holding could not be mechanistically applied to a question of vicarious liability.[21] Because the legal issues and facts differed in LaRose from Dolan, the court declined to conclude King County was vicariously

---

[15] Id. at 314 (citing Hollingbery v. Dunn, 68 Wn.2d 75, 80-81, 411 P.2d 431 (1966)).

[16] Id. at 320.

[17] 8 Wn. App. 2d 90, 437 P.3d 701 (2019).

[18] Ch. 49.60 RCW.

[19] LaRose, 8 Wn. App. 2d at 129.

[20] Id.

[21] Id. at 129-30.

liable as a matter of law.[22] Under the circumstances in LaRose, the right of control test showed King County was not vicariously liable for PDA's conduct.[23]

We agree with the LaRose court that Dolan is a narrow decision confined only to issues of PERS eligibility. It does not compel the conclusion that King County is vicariously liable for ACA's conduct. Notably, under the right of control test relied upon in Dolan, King County had no control over and no involvement in ACA's personnel decisions regarding Davison, including her claims for unemployment benefits and for relief through the Equal Opportunity Employment Commission and National Labor Relations Board. Because King County had no control over Davison's termination, it is not vicariously liable for the termination itself or any harm resulting from it.

Nor is King County ACA's successor under Dolan. Despite Dolan's broadly written holding, nothing in the decision's reasoning suggests the Supreme Court intended to make King County ACA's successor as a matter of law. Questions of successor liability are distinct from questions of vicarious liability. Aside from Dolan, Davison offers no Washington authority to show that a government agency can be the successor to a private corporation. Further, Davison offers no authority establishing that such a successor would be liable for the predecessor's discriminatory or tortious conduct. Consistent with LaRose, Dolan is limited to its

---

[22] Id. at 130.

[23] Id.

narrow facts and, thus, is legally distinguishable. It does not stand for the proposition that King County is subject to successor liability as a matter of law.

Davison raises other theories of successor liability in her response to King County's cross appeal. But as her trial attorney admitted, "I don't have the documentation," to prove successor liability.[24] Consistent with this admission, the appellate record does not support a finding of successor liability.

Dolan is narrowly limited to eligibility for retirement benefits. Davison fails to show King County is ACA's successor. The trial court did not err by dismissing all claims against the only named defendants, King County, KCACA, and DPD. Because all of Davison's theories of liability depend upon successor liability, we need not consider the issues raised by her appeal.

We affirm.

WE CONCUR:

[24] RP (June 30, 2017) at 56.

ELVIRA DAVISON - FILING PRO SE

January 06, 2020 - 10:54 AM

Transmittal Information

Filed with Court:	Court of Appeals Division I
Appellate Court Case Number:	77652-5
Appellate Court Case Title:	Elvira Davison, Appellant / Cross- Respondent v. King County, Respondent / Cross-Appellant

The following documents have been uploaded:

- 776525_Other_Filings_20200106105249D1894369_5233.pdf
  This File Contains:
  Other Filings - Appearance
  The Original File Name was 2020.01.06 Notice of Appearance.pdf
- 776525_Petition_for_Review_20200106105249D1894369_3793.pdf
  This File Contains:
  Petition for Review
  The Original File Name was 2020.01.06 Petition 4 Discretionary Review.pdf

A copy of the uploaded files will be sent to:

- cat@loccc.com
- david.hackett@kingcounty.gov
- tim@gosselinlawoffice.com

Comments:

Sender Name: Elvira Davison - Email: elviraj54@yahoo.com
Address:
P.O. Box 40034
Bellevue, WA, 98015
Phone: (425) 948-8715

Note: The Filing Id is 20200106105249D1894369