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SUPREME COURT OF THE STATE OF WASHINGTON

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DONALD HOTH,

Petitioner-Appellant,

v.

EDWARD HOTH,

as the Trustee of the Living Trust of Carl L. and Ruth L. Hoth,

Respondent.

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**ANSWER TO PETITION FOR REVIEW**

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## I. INTRODUCTION

The parties to this appeal are Respondent Edward Hoth and his brother, Appellant-Petitioner Donald Hoth,<sup>1</sup> who is seeking review of a ruling of Division I of the Court of Appeals (Hoth v. Hoth, 80284-4-I, 2020 WL 6561324 (Wash. Ct. App. Div. I, Nov. 9, 2020)) affirming an order of the Whatcom County Superior Court (Whatcom County Superior Court No. 19-4-00342-37) regarding a trust accounting provided by Edward in his capacity as trustee of their parents' trust, the Living Trust of Carl L. and Ruth L. Hoth dated May 9, 1986 and amended July 2, 2013. Donald suggests that his Petition for Review is premised on the sufficiency of the trust accounting under the Trust and Estate Dispute Resolution Act, chapter 11.96A RCW ("TEDRA"). In reality, this appeal is simply the latest development in a regrettable family quarrel originating in the administration of Edward and Donald's mother's estate—a quarrel that is as baseless as it is judicially irresolvable. Both the trial court and the Court of Appeals recognized the vexatious nature of Donald's campaign and awarded Edward his attorneys' fees and costs in addition to denying all of Donald's claims. Now, Donald seeks to make the Washington Supreme Court an accomplice to his acrimony. Donald's Petition for Review fails to comply with RAP 13.4(b), presents no basis for review by the Supreme Court, and lacks

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<sup>1</sup> Because they share a last name, this Answer refers to the parties by their first names. No disrespect is intended.

even a shadow of merit. It should therefore be denied, and Edward should be awarded his full attorneys' fees and costs incurred in responding to this Petition.

## **II. COUNTER-STATEMENT OF ISSUES PRESENTED FOR REVIEW**

No issues presented in this case would justify review by the Supreme Court. The issues identified by Donald in his Petition for Review were correctly and fully resolved by the trial court and the Court of Appeals, and would not present a proper basis for review even if Donald's assignments of error were accurate—which they are not.

## **III. COUNTER-STATEMENT OF THE CASE**

The factual background presented in Donald's Petition for Review omits crucial context regarding the frivolous nature of Donald's claims. As the Petition for Review would have it, Donald is merely seeking the Supreme Court's guidance on issues related to TEDRA that the Court of Appeals supposedly failed to resolve. See Petition for Review at 4-7. In reality, Donald has repeatedly made it clear that he has no interest in these questions, and his TEDRA petitions and the appeals therefrom are all premised on causing harm to his brother.

This matter originally arose in 2019 upon two petitions from Donald filed in Whatcom County Superior Court—a petition for an accounting from Edward in his role as trustee of their parents' trust, and a petition to mediate, both under the aegis of TEDRA. CP 1-3; 5. Donald noted a hearing on July 5, 2019. CP 4. Edward filed a response to Donald's trust accounting petition and

provided an accounting for the trust, as Donald had requested, along with declarations in support of the accounting. CP 6-103. Edward's petition and its attendant declarations also discussed at length the vexatious nature of Donald's claims and the numerous bar complaints (along with other threats) he had made against Edward and his counsel with the intent of harassing counsel into abandoning their representation. CP 10-12; 19-21; 24-58; 67-69. Edward simultaneously filed a petition objecting to mediation, which asked the trial court to make a final ruling on Donald's trust accounting petition at the July 5 hearing rather than order mediation, which Edward believed would be ineffective on account of the parties' history and relationship. CP 104-105.

At the hearing on Donald's petitions on July 5, 2019, Donald was pressed by the trial court to articulate what information he was seeking that was not already in the trust accounting previously provided by Edward. RP 18-21.

The trial court asked Donald:

[W]hat information are you wanting to know, Mr. Hoth, that's not contained in the accounting that you've been given? [...] What I want to know is what do you, what information are you wanting to see that is not in this accounting? [...] What should be, what information should be given to you here that you haven't been given?

RP 18-19; 19; 21. In response, Donald indicated that he wanted information from before Edward became trustee of their parents' trust. RP 20-21 The trial court pointed out that such issues were not before the court at that hearing. RP 21. The trial court emphasized "[w]hat's before the Court is simply the issue of trust administration." RP 27. Donald's response was "Yeah, I'm not really

complaining about that,” and “I don’t really want to waste that much time on that issue.” RP 21; 22-23. With no unresolved request for information related to the accounting that Donald purported to seek under TEDRA, the trial court expressly approved of Edward’s accounting, rejected Donald’s request for mediation, and signed an order to that effect. RP 37; CP 125-127. The trial court also awarded Edward the full amount of his attorneys’ fees and costs (less a nominal amount foregone to simplify accounting). RP 29; CP 125-126.

Donald appealed the trial court’s order approving the trust accounting and rejecting mediation (but not the award of Edward’s attorneys’ fees). The Court of Appeals affirmed the rulings of the trial court, rejected Donald’s appeal in its entirety, and awarded Edward his attorneys’ fees on appeal. Hoth, 80284-4-I, 2020 WL 6561324 at \*4-\*5.

Donald filed this Petition for Review on December 9, 2020. The following day, Donald sent an email to Edward and their two other siblings seemingly to ensure there would be no mistaking his bad faith:

So you want to litigate? Fine. We’ll each hide behind our lawyers and be just as litigious as possible. [...] Still don’t like the idea of mediation? Fine, we’ll do another round of litigation. We’ll drag this out and hopefully you will be dead before this gets settled. Do you think Mom and Dad set you up as trustee just so you could keep us at loggerheads for the rest of our lives? Really? Fine. wish me luck in supreme court. Hope you die soon.<sup>2</sup>

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<sup>2</sup> A true and correct copy of this email (with personal email addresses redacted) is included in the Appendix hereto, not to supplement the record or reflect on the substance of the Petition for Review or Donald’s appeal generally, but only to demonstrate the frivolous nature of Donald’s basis for seeking review, and to further document what the Court of Appeals referred to as the

#### IV. ARGUMENT

##### A. The Petition for Review Fails to Comply with RAP 13.4.

Because the Court of Appeals' ruling was a decision terminating review, Donald's Petition for Review is governed by RAP 13.4. See RAP 13.3(b). RAP 13.4(b) provides four tests for acceptance of a petition for review by the Supreme Court:

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 a published 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.

See RAP 13.4(b) (emphasis added). There are no other bases for acceptance of review of a decision terminating review. Id. Additionally, RAP 13.4(c)(7) provides that the party seeking review has the burden of providing "[a] direct and concise statement of the reason why review should be accepted under one or more of the tests established in section (b), with argument." See RAP 13.4(c)(7). Regarding a petition's compliance with RAP 13.4, the Supreme Court has held that "it is not the function of trial or appellate courts to do counsel's thinking and briefing." State v. Chapman, 140 Wn.2d 436, 453, 998

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parties' "combative relationship" in its analysis of Donald's claims. Hoth, 80284-4-I, 2020 WL 6561324 at fn 5.



P.2d 282, 291 (2000) (citing Orwick v. City of Seattle, 103 Wn.2d 249, 692 P.2d 793 (1984)).

Donald makes no attempt to carry his burden under RAP 13.4. The Petition does not cite RAP 13.4 or provide any suggestion—even implicitly—that review is appropriate under any of the four tests. For this reason alone, his Petition for Review should be categorically denied.

**B. The Lack of Any Basis for Review under RAP 13.4(b) Makes the Petition Inappropriate for Review Regardless of the Failure to Comply with RAP 13.4.**

Instead of grounding the Petition in one of the four tests under RAP 13.4(b), Donald asks the Supreme Court to “confirm both the procedures and the substantive requirements for TEDRA mediation under RCW 11.96A.300” and to “determine whether it is appropriate for a court to confirm a trust accounting when the record was admittedly incomplete.” See Petition for Review at 3.

Setting aside (for the sake of argument) the fact that the Court of Appeals clearly answered both of these questions with ample citation to authority, Donald’s Petition for review might be charitably construed as appealing to the fourth test under RAP 13.4(b): issues of substantial public interest. The Petition makes no argument in support of review under this test, but Donald attempts to phrase his Petition in broad terms that could conceivably implicate questions of public interest. Regardless, his own Statement of the Case makes clear that this appeal has no bearing on the public interest; it arose

as a result of Donald’s subjective dissatisfaction with the trust accounting prepared by Edward and approved by the trial court and his baseless desire to have the trial court rule on his Petition for Mediation prior to ruling on his Petition for a Trust Accounting. In any case, the dispute at the heart of this appeal is specific to these parties and facts. This is, fundamentally, a dispute peculiar to one family. No issue of public interest is implicated, and the questions posed by Donald’s Petition could not conceivably elicit meaningful guidance on the disposition of related disputes. RAP 13.4(b) therefore bars acceptance of review by the Supreme Court on that basis, no matter how charitably Donald’s Petition is construed.

**C. The Issues to which the Petition for Review Speciously Assigns Error were Fully and Correctly Resolved by the Court of Appeals.**

The essential substance of Donald’s Petition for Review is not that review is appropriate under RAP 13.4(b) but rather that the Court of Appeals erred in its rulings. Even if this matter were appropriate for review under any of the four tests set forth in RAP 13.4(b)—which it is not, and Donald makes no attempt to argue otherwise—the substantive assignments of error in the Petition are meritless.

Donald first claims that the Court of Appeals erred in affirming the trial court’s denial of Donald’s Petition for Mediation under RCW 11.96A.300. Donald’s argument on appeal was that TEDRA required the trial court to make an express finding of “good cause” for denying mediation under RCW 11.96A.300, and that it was required to do so prior to ruling on the sufficiency

of the trust accounting. See Appellant’s Opening Brief at 3-5. The Court of Appeals expressly rejected these arguments. Hoth, 80284-4-I, 2020 WL 6561324 at \*2-\*3. Nonetheless, Donald alleges that “the Court of Appeals deftly side-stepped the issue altogether.” See Petition for Review at 5.

This is a gross mischaracterization of the ruling of the Court of Appeals. The Court pointed out that, by failing to raise the issue at the hearing, Donald had waived the right to appeal any issue related to “good cause” for mediation under RCW 11.96A.300 . Hoth, 80284-4-I, 2020 WL 6561324 at \*2-\*3 (noting that Donald’s briefing had not even responded to Edward’s argument regarding waiver). In addition, although it was under no obligation to consider the merits of Donald’s argument, the Court took care to rule both that no express finding of “good cause” was required in order to comply with RCW 11.96A.300, and that the record demonstrated more than sufficient “good cause” to deny mediation, citing the parties’ “combative relationship” and Donald’s outlandish accusations of intimidation against Edward and his attorneys. Id. at \*2-\*3; fn 5. The Court found that there was no statutory basis for the contention that the trial court should have first ruled on Donald’s petition for mediation before considering his petition for a trust accounting. Id. at \*2. The Court cited statutory and case law authority for its ruling, which neither Donald’s briefing nor the Petition for Review made any attempt to address. There was no error in the Court’s ruling on this issue, and Donald’s suggestion that the Court “side-stepped the issue” is nakedly meritless.

Donald next argues that the Court of Appeals erred in affirming the trial court's approval of Edward's accounting, arguing, as he did before the Court of Appeals, that Edward was required to provide "source documentation." See Petition for Review at 6. As with Donald's previous argument, the Court of Appeals considered it and rejected it. The Court noted that the trial court's approval of a trust accounting is reviewed for abuse of discretion. Hoth, 80284-4-I, 2020 WL 6561324 at \*3 (citing In re Estate of Fitzgerald, 172 Wn. App. 437, 294 P.3d 720 (2012), and In re Estate of Mower, 193 Wn. App. 706, 374 P.3d 180 (2016)). The Court pointed out that Edward had provided the trial court with an accounting on which it could rule, that Donald could not articulate any perceived error or issue with the accounting despite numerous opportunities at the hearing, and that there was no support whatsoever for Donald's contention that he was entitled to source documents. Id. at \*3-\*4. The Court of Appeals, finding no abuse of discretion, affirmed the trial court's approval of the accounting. Id. at \*4. Donald does not argue that the Court of Appeals applied the wrong standard of review, or that its ruling was inconsistent with any statute or case, nor does he offer any substantive response to the authority cited by the Court. He simply repeats the baseless claim—expressly rejected by the Court of Appeals for lack of support—that he should have been provided with "source documents." Again, there is no error here, and Donald's contentions to the contrary are meritless.

Thus, to the extent any hypothetical error in the ruling of the Court of Appeals could conceivably justify review by the Supreme Court, Donald has provided no reason whatsoever to conclude that the Court's ruling was in error, and his Petition should therefore be denied.

## **V. REQUEST FOR SANCTIONS**

RAP 18.1 permits the Supreme Court to award attorneys' fees and costs where statute provides for such an award. See RAP 18.1. Under TEDRA, RCW 11.96A.150 permits a discretionary award of fees and specifically cites the consideration of whether the "litigation benefits the estate or trust involved" in determining whether an award of fees is appropriate. See RCW 11.96A.150. In response to Donald's appeal, the Court of Appeals specifically held that "this litigation did not benefit the Trust," and that "this litigation does not raise novel or unique issues, the resolution of which added benefit to the appeal," and accordingly awarded Edward the full amount of his attorneys' fees and costs under RAP 18.1. Hoth, 80284-4-I, 2020 WL 6561324 at \*5. (It is worth noting that Donald did not assign any error to this ruling in his Petition for Review.) The fact that Donald has re-submitted the arguments already rejected by the Court of Appeals with no additional reference to authority and no pretense of compliance with RAP 13.4 demonstrates that the same award of fees is appropriate under RAP 18.1 in response to Donald's Petition for Review as it was in response to his appeal to the Court of Appeals.

Additionally, RAP 18.9 provides that the Supreme Court may order a party “who uses these rules for the purpose of delay, files a frivolous appeal, or fails to comply with these rules to pay terms or compensatory damages to any other party who has been harmed by the delay or the failure to comply or to pay sanctions to the court.” See RAP 18.9(a). As discussed above, in assessing a request for sanctions on the basis of a frivolous petition for review, the Supreme Court has held that “it is not the function of trial or appellate courts to do counsel’s thinking and briefing.” Chapman, 140 Wn.2d at 453. In Chapman, the Respondent requested sanctions on the basis that the Appellant’s petition for review offered no briefing or argument in support of review. Id. at 454. Notably, in Chapman, the Supreme Court declined to award sanctions only because the subject matter of the petition in that case incidentally presented issues of public interest, notwithstanding the petitioner’s failure to properly brief such issues. Id. But the Court suggested that sanctions would have been appropriate had issues of public concern not been present. Id.

In this case, Donald’s Petition for Review provides the Supreme Court with no conceivable basis for granting review. The Petition makes no attempt at all to comply with the requirements of RAP 13.4. Like the petitioner in Chapman, Donald apparently expects the Supreme Court to do his thinking and briefing for him. Unlike the petitioner in Chapman, no issues of public interest are raised by Donald’s Petition, incidentally or otherwise. Donald makes no pretense that his petition is based on anything other than his displeasure with

the adverse rulings of the trial court and the Court of Appeals. Donald's attempts to cloak his motives in requests for "clarity" and "guidance" are hollow, and the questions that Donald purports to ask the Supreme Court to answer were already answered by the Court of Appeals—Donald simply doesn't like the answers.

Finally, if there were any lingering doubt about the nature of Donald's crusade against his brother, he took care to make his bad faith explicit in the email to Edward the day after he filed his Petition for Review, where he announced his intent to "drag this out" and "be just as litigious as possible," while expressing his eager hope for Edward's death:

So you want to litigate? Fine. We'll each hide behind our lawyers and be just as litigious as possible. [...] Still don't like the idea of mediation? Fine, we'll do another round of litigation. We'll drag this out and hopefully you will be dead before this gets settled. Do you think Mom and Dad set you up as trustee just so you could keep us at loggerheads for the rest of our lives? Really? Fine. wish me luck in supreme court. Hope you die soon.<sup>3</sup>

Plainly, this is not a rational claimant seeking resolution of legitimate issues in regard to which reasonable minds might differ. Both the trial court and the Court of Appeals recognized that Donald's only goal is to vex his brother and awarded Edward his attorneys' fees. This Petition for Review is merely another attempt to make the judiciary an instrument of Donald's petty, insatiable anger. The Supreme Court should therefore award Edward his attorneys' fees and costs

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<sup>3</sup> A true and correct copy of this email is included in the Appendix hereto.

incurred in responding to the Petition, in an amount to be set forth in an affidavit submitted pursuant to RAP 18.1(d).

## VI. CONCLUSION

Donald's Petition for Review fails to comply with RAP 13.4 and should be denied on this basis alone. Even if Donald had made some pretense of compliance with RAP 13.4, no issues presented in this case would justify review by the Supreme Court. The issues identified by Donald were correctly and fully resolved by the trial court and the Court of Appeals, and would not present a proper basis for review even if Donald's assignments of error bore even a hint of merit, which they do not. It is clear that this Petition is merely the latest attempt by Donald to use the judiciary to vex his brother, and the Court should therefore sanction him under RAP 18.1 and 18.9 by awarding Edward his reasonable attorney's fees and costs.

Dated this 8th day of January, 2021.

Respectfully submitted,

BARRON SMITH DAUGERT PLLC



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Sallye Quinn, WSBA No. 28659  
Nolan Davidson, WSBA No. 47682  
Of Attorneys for Respondent Edward Hoth



## APPENDIX - EMAIL FROM DONALD HOTH

**From:** "Don Hoth" <REDACTED@yahoo.com>  
**To:** "eshoth" <REDACTED@q.com>  
**Cc:** "Peg Dare" <REDACTED@comcast.net>, "Chip Home" <REDACTED@msn.com>  
**Sent:** Thursday, December 10, 2020 4:14:27 PM  
**Subject:** Timeline

Dearest Ed,

Just for the record, there will be no reconciliation for us. But I guess you don't care about that. Unbeknownst to me, you were probably ready to give up on this relationship long before you took over as fiduciary. This just to make it official. Here's the timeline:

January 2016 ----- I emailed you and Chip and Peggy asking who knew anything about Mom and Dad's estate planning. If ever there was a time to let me know that you were in line to be the trustee, that was it. But no, you chose to keep me in the dark with vague promises about "helping me" with the house and estate.

June 2016 ----- After your consultation with Mr Smith you came out swinging with empty threats to "cut me out of the trust". I'm sure you said that at least three times within days of arriving in Bellingham. It's not believable that Mr Smith urged you to threaten me. If he had a standing policy of urging trustees to bully their charges, I would have heard about it by now. No, the bullying and lying was definitely all you. And it is not believable that Mr Smith neglected to tell you that I, having lived in that house for almost two years, had a right to due process. No, I suppose your strategy was just to move fast and break things.

November 2017 ----- It is not believable that Mr Smith never discussed with you the possibility of going into mediation with me before urging the rest of the family to sign out of the trust leaving me to pay for YOUR legal representation. That was cowardly and mean-spirited of you.

November 2018 ----- As soon as Ms Quinn stepped out of the shadows to say she would be succeeding Mr Smith, I proposed mediation. It is not believable that Ms Quinn advised you to ignore the proposal. If she too had a reputation for being stubborn and unmovable I would have heard about it by now. No, the opposition to mediation was surely coming from you.

June 2019 ----- In an effort to uphold the family name and minimize litigation, I filed my "pro se" petition in the court. (I never filed a claim against you and it is misleading to say I sued you. But I guess you don't mind being misleading or dishonest.) My action was just meant to compel you into mediation for civil dispute resolution. Being the trusting sap that I am, I really didn't expect you to run up a huge legal bill (charged against me) proactively opposing mediation on the grounds that it's "vexatious" (Ms Quinn's favorite word). Your opposition to the mediation was more vexatious than the mediation itself.

RESPONDENT'S ANSWER TO APPELLANT'S PETITION FOR REVIEW

September 2019 ----- So you want to litigate? Fine. We'll each hide behind our lawyers and be just as litigious as possible. But for the record, I have always been the one advocating for civil dispute resolution. And you have always been for bullying and maximum litigation.

December 2020 ---- Still don't like the idea of mediation? Fine, we'll do another round of litigation. We'll drag this out and hopefully you will be dead before this gets settled. Do you think Mom and Dad set you up as trustee just so you could keep us at loggerheads for the rest of our lives? Really? Fine. wish me luck in supreme court. Hope you die soon.

Just remember, mediation is not a defeat for you. And it's not a victory for me. It's just a way forward for us. I guess you don't care about "us" but Mom and Dad cared and I believe they expected you to.

Yours, Don

**CERTIFICATE OF SERVICE**

I hereby certify that on January 8th, 2021, I caused a true and correct copy of the foregoing to be served upon the following person in the following manner:

[ X ] Electronic Mail

Bryan D. Lane, WSBA No. 18246  
Lane Law Firm, P.L.L.C.  
1313 E. Maple St.  
Bellingham, WA 98225  
*bryan@bryanlanelaw.com*



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Sallye N. Quinn, WSBA No. 28659  
Nolan Davidson, WSBA No. 47682

**BARRON SMITH DAUGERT PLLC**

**January 08, 2021 - 1:11 PM**

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