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COURT OF APPEALS
DIVISION ONE

NOV 25 2013

**Court of Appeals No. 70336-6
King County Cause No. 12-2-18444-5 SEA**

**COURT OF APPEALS
DIVISION I
STATE OF WASHINGTON**

AZITA SHORKHANLOO,

Appellant
(Plaintiff Below)

v.

LAURIE OLSON-GAINES and EDWARD SCHAU,

Respondents
(Defendants Below)

APPEAL REPLY BRIEF OF APPELLANT AZITA SHIRKHANLOO

Decisions to be Reviewed:

Order of King County Superior
Court Judge Teresa Doyle of
04/12/13 Granting Summary
Judgment to Respondents

Stuart E. Brown
WSBA #35928
Attorney for Azita Shirkhanloo
2535 15th Ave. NE, #201
Seattle, WA 98125
206-407-9183

Pamela Andrews
WSBA #14248
Attorney for Laurie Olson-Gaines
c/o Andrews Skinner PS
645 Elliott Ave. West, Suite 350
Seattle, WA 98119
206-223-9248



Ramona Hunter
WSBA #31482
Attorney for Edward Scahu
c/o Cozen O'Connor Law Firm
1201 Third Ave., Suite 5200
Seattle, WA 98101
206-808-7823

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Comes now the Appellant, AZITA SHIRKHANLOO, (Plaintiff below), by and through his attorney of record, Stuart E. Brown, and respectfully submits her Reply to the Responsive Briefs of the Respondents Laurie Olson Gaines and Edward Schau under RAP 10.3.

I. REPLY AS TO RESPONDENT LAURIE OLSON GAINES

Respondent Olson Gaines, by and through her attorney of Record, Pamela Andrews, maintains on page one, paragraph four of her response, “Appellant asserts with no factual basis or supporting authority, that WAC 246-924-455 (an administrative provision governing psychologists who perform parenting evaluations) applies to Ms. Gaines, a licensed social worker, that Ms. Gaines allegedly failed to adhere to the “standards” (quotations provided by Ms. Andrews) set forth in that administrative code provision” Ms. Andrews (hereafter referred to as opposing counsel or OC) then lists several additional claims made by this attorney for the Appellant (Stuart Brown) in the Appellant’s initial brief and states on page two, paragraph two, “Appellant is wrong on all of her assertions.”

This rather stunning pronouncement by Ms. Olson Gaines’ own attorney, validates and admits to the most basic and perhaps most critical charge/allegation the Appellant has made in claiming that Respondent

Olson Gaines is not entitled to protection in this case under the color or claim of Quasi-judicial immunity or expert witness immunity and by admission 'makes the case' of the Appellant. The mother noted in her initial brief that the parenting evaluator (PE) in fact admitted under oath at the 04/12 trial before Judge Fleck, that she had not followed the required WAC standards for a PE and claimed she was not required to do so and admitted that she did not follow those standards "as she was not a psychologist," despite having already filed a *sworn* (italicized here and below for emphasis) declaration at the start of her work stating that she was obligated to follow these standards (CP 24, Exhibit 11, Trial Transcript of Laurie Olson Gaines). She testified under oath at that trial that she did not believe she needed to follow *any* standards but in the end decided to follow GAL standards despite her not being a GAL in the case (CP 24, Exhibit 11, Trial Transcript of Laurie Olson Gaines).

Thus, in her own reply through her attorney, Respondent Gaines now makes it 100% clear and without any equivocation or defense, that she *did not* follow legal requirements under WAC 246-924-445 and claims she *is not* obligated to follow the very standards which dictate how an ethical and professional or *any* PE must be done. Respondent Olson Gaines accepted a court appointment as a PE and under sworn declaration after her appointment noted that she *was* obligated to follow WAC 246-

924-445 PE standards regardless of not being a Psychologist, and yet at trial under cross examination and here in her reply brief, claims that she not only did not have to follow the WAC standards but again did not have to follow *any* standards. Thus by her own admission she in essence states that she did *not* carry out her court appointed role and charge to complete a valid and professional PE that could be used to assist the court, and thus cannot and should not be protected under the doctrine of quasi-judicial immunity or expert witness immunity. It is not clear *what* Respondent Olson Gaines was doing in this case but her own sworn testimony makes it abundantly clear that she was not completing a PE under any set of standards and in fact stated (wrongly) that she believed she was a GAL or at least used GAL standards for completing a PE, when in fact no such standards exist under GAL guidelines.

As this court will recall, in her Appellate brief, Ms. Shirkhanloo (hereafter referred to as ‘the mother’) argued unequivocally that in her (Ms. Olson Gaines) role as PE she was *legally* required to complete a fair, objective, impartial Parenting Evaluation of the parties, while *strictly* adhering to statutory requirements pertaining to conducting of a PE as detailed in WAC-246-924-445 (CP 24, Exhibit 12, WAC Parenting Evaluation Standards). See CP 24, Exhibit 2, Mother’s Trial Brief for Dissolution Trial, Pages 7-27; Exhibit 11, Trial Transcripts of Cross

Examination of Laurie Olson Gaines (PE) and Edward Schau, Ph.D.; Exhibit 3, Judge Fleck's Order Vacating Final PP and CR2A agreement).

The mother had maintained that both the initial and final evaluations of the PE were deficient, incompetent, and utterly failed to follow both statutory requirements and professional standards she was required to adhere to, both during the actual evaluation process itself and as an expert witness at the actual trial itself before Superior Court Judge Deborah Fleck in 04/12.

The mother also maintained at the actual trial before Judge Fleck that Ms. Olson Gaines as PE went far beyond her role, charge and scope as a PE and maintained that the net results of the PE's behavior, actions, and faulty evaluations, was to produce one of the most punitive, demeaning, and coercive parenting plans imaginable, as noted by trial Judge Deborah Fleck. The mother further maintained that the PE's final parenting evaluation on 09/09/10 led *directly* to the new final orders and parenting plan (PP) of 01/15/10 pursued by the father (Tim Smith) and his attorney Margaret Fitzpatrick) and directly to the baseless and damaging removal of the child from the mother's primary custody, followed by long-term mother and child separation, demeaning forced and unnecessary treatment for the mother, and long-term requirements for supervised visits. As noted in the mother's initial brief, only a day or two after she (Ms. Olson Gaines) completed her final evaluation report, she testified to the initial

trial Judge (Judge James Doerty) that the mother should not even be allowed to see her own evaluation (completed by Ms. Olson Gaines) as she (the mother) was potentially suicidal and said evaluation if read by the mother could lead to her self-inflicted demise. These frankly preposterous and unsubstantiated claims by Ms. Olson Gaines resulted in the mother then being deprived of seeing her own evaluation report and being forced to attend required mediation without such direct knowledge of her evaluation results and with her (the mother) eventually walking out of the mediation refusing to sign any CR2A agreements given her correct belief that her civil rights had been violated. At the trial of 04/12 before Judge Fleck, Ms. Olson Gaines denied that she had made such a statement to Judge Doerty or that she had even attended a hearing where she stated the mother was suicidal or homicidal, but upon cross examination as noted in her trial transcript provided to this court of appeals, it became clear that she had in fact made such statements and was in fact the person who asked for the hearing and/or acted complicitly with the father's attorney in asking Judge Doerty to immediately take custody away from the mother based on the bogus and unsupportable claim that the mother was suicidal and to deprive the mother of her right to read her own evaluation. In short, Ms. Olson Gaines' behavior throughout the pendency of this case has been fraught with deceptions to the court, incompetency and utter failure by her

own sworn testimony noted in her cross examination transcript, to adhere to any standards of practice while utterly failing to complete her court ordered charge and role and thus is not entitled to any protection granted under quasi-judicial immunity or expert witness immunity at any level.

In her “Counterstatement of Assignment of Error,” OC asks, “Did the trial court properly enter an order of summary judgment in favor of Defendant Gaines based upon the uncontested facts that Gaines was court appointed to serve as a Parenting Evaluator (PE) and when all of the acts complained of by Appellant were acts of Gaines done in her role as a court appointed evaluator and the testimony and reports of Gaines were given in her capacity as an expert witness who was court appointed as an arm of the Court, at the court’s request?”

While OC answers her issue question in the affirmative, the reality as detailed in the Appellant’s brief (and here in her reply) is that while Respondent Gaines was court appointed to serve as a PE, she did not as noted above, complete a PE under *any* standards and apparently defined herself as a GAL in the case while not being court appointed as such and in her own reply brief, tellingly ‘runs away’ from any responsibility for completing a valid PE under the WACs despite her sworn declaration noted above that she must comply with such WAC standards even though she is not a Psychologist, now using the excuse that she is a social worker

and raising the additional issue of whether she accepted the court appointed role of PE fraudulently or inappropriately if indeed she did not believe she was qualified to accept and complete the court appointment as a PE. Further, in contradiction to the claim above by OC, Respondent Gaines certainly did *not* complete all of the acts complained of by the Appellant, as part of her court appointed role as PE. In her initial Appellate brief, the mother in fact detailed the many acts completed by Respondent Gaines during the pendency of the case that were beyond the scope of her charge, were completely extraneous to and had nothing to do with completing a valid and professional PE under the WAC standards including her investigating numerous irrelevant ‘inconsistencies’ she claimed existed on the part of the mother (see trial brief provided to this court and referenced previously) and which she (Respondent Gaines) later claimed were raised by her assistant *mother*, thus disavowing such preposterous and fanciful so-called inconsistencies against the Appellant. The mother maintains that it is not simply an issue of Respondent Gaines engaging in negligent, reckless, fraudulent and perjurious behavior both as an evaluator and as an expert witness, but that she in fact *did not* complete anything approaching a valid and professional PE as ordered by the court.

Counsel for Respondent Olson Gaines in her ‘Counterstatement of Assignment of Error’ poses a second issue question by asking, “Does the

grant of absolute immunity for a court appointed expert witness remain intact and impenetrable to challenge even if the expert is accused of wrongdoing, conspiracy or intentional misconduct?" She answers her own issue question in the affirmative citing *Bruce v. Byrnes-Stevens*, 113 Wn.2d 123, 125 (1989) and *Reddy v. Karr*, 102 Wn.App, 742,749 (2000), (the actual case relied on by Judge Doyle in granting Respondent's Motion for Summary Judgment), among others.

The mother argued in her Appellate brief and continues to argue here, that the order granting summary judgment should be rejected for reasons cited and essentially argues that there are indeed genuine issues of fact before the court in terms of the defendants so significantly and egregiously failing to even remotely carry out their charge and stay within the scope of their appointments, that they are not entitled to any such immunity. The mother argues that as a matter of public policy our Supreme Court never intended to protect persons engaging in the behavior alleged as to the Defendants. While it is admitted that case law cited by OC does suggest that the immunity afforded to court appointed expert witness shields such experts from suits based on negligence, the mother maintains that what is being argued here is indeed a case of first impression addressing an issue not foreseen or not addressed by our Supreme Court: Whether our Supreme Court intended to provide

unbridled and absolute immunity from personal suits in a case where court appointed experts have so blatantly and deliberately ignored carrying out of their court appointed duties while failing to remain within the scope of their duties such that they in fact were *not* remotely carrying out their court ordered responsibilities. The mother maintains that they (our Supreme Court) did not. Stated in other words: Is there a level at which a court appointed professional so far strays from his or her task and responsibility to the court and so fails to adhere to standards for completion of that court ordered duty, that they lose any protections afforded under the doctrine of quasi-judicial immunity and expert witness testimony immunity? The mother maintains that the answer here is yes and asks the court to accept her analysis of other cases (as argued in her initial brief) that were offered to reflect the reality that our Supreme Court has in fact carved out exceptions to the immunity doctrines and determined that professionals once viewed as being afforded such immunity protections, no longer are and are deemed to have qualified immunity, as opposed to absolute immunity, subject to scrutiny as to how they carried out their functions (see mother's initial Appellate brief as to such analysis). For example, the mother noted previously that there is no absolute immunity for investigation and other tasks performed by caseworkers, although prior to subsequent Supreme decisions regarding

DSHS caseworkers, caseworkers were deemed to have absolute immunity from suit. *Ready v. Karr*, 102 Wash. App. 742, 9 P.3d 927 (2000).

Instead, caseworkers are now entitled to a qualified immunity when they (1) carry out a statutory duty; (2) follow procedures dictated *by statute* and superiors; and *act reasonably* in doing so. *Yuille v. State Dept. of Social & Health Services*, 111 Wash. App. 527, 45 P.3d 1107 (2002).

We maintain that this court can certainly do the same here as a case of first impression and find that when a court appointed professional so far strays from its court ordered role and requirements, fails to stay with the scope of appointment, utterly fails to meet basic professional and ethical standards to the point they are sanctioned by their licensing agency (as to Dr. Schau as noted below), acts in a role different than that assigned by the court (as to Laurie Olson Gaines who maintained that she was acting as a GAL in the case when she was appointed as a PE), and acts in a reckless and destructive manner as here; this court can and should not provide immunity. Public policy is certainly not served by allowing no limit as to the misbehavior of a court appointed professional and resultant damage caused. This could not have been the intent of our highest courts.

Counsel for Respondent Olson Gaines points to *Tobis v. State*, 52 Wn.App. 150, 758 P.2d 534 (1988) and *Bader v. State*, 43 Wn.App. 223, 716 P.2d 925 (1986), in support of her claim that Olson Gaines should be

entitled unequivocally to absolute immunity. These cases involved suits against mental health professionals who evaluated psychiatrically impaired individual while they were confined to psychiatric facilities and recommended release of such individuals with these individuals later murdering victims upon their release. In these cases there were in fact no claims from any quarter that the Psychiatrists or mental health professionals involved in the evaluations, failed to complete their evaluations according to statutory or administrative code standards or failed to follow Department of Health or other regulatory professional guidelines or standards; or strayed so far from the court's directives or appointed duties and scope of appointment so as to make their performance meaningless or moot in terms of such court appointed duties, as took place in our case. The mother believes that the same analysis applies to *Walker v. State*, 60 Wn.App. 624 (1991), also cited by OC in her responsive brief.

OC's own citing of *Gilliam v. State Dept. of Social and Health Svcs.*, 89 Wn.App. 569, 950 P.2d 20 (1998), is actually informative as to the mother's claims. OC quotes *Gilliam* as follows: "The focus of an inquiry into a proposal for absolute immunity is the degree to which the function performed by the conduct at issue is 'intimately associated' with the judicial phase of a proceeding." While the mother does not contest that

the role of court appointed PE was tasked with performing an evaluation for the court within the judicial proceedings and would otherwise be protected under the doctrine of absolute immunity *had she actually* carried out such a role and court appointed tasks as a PE. The mother maintained in her initial brief and here that that is exactly the issue of fact that she should have an opportunity to argue and investigate at a suit trial. That is, whether the Respondent Olson Gaines actually fulfilled her role as PE in the case. The mother argues that she clearly did not and as such should not be afforded absolute immunity.

In *Gilliam* at 572, the court noted, “We are asked to decide whether an absolute immunity shields the State from a suit for damages caused by a caseworker’s negligent investigation conducted after the filing of a dependency action. The State claims the caseworker’s actions were entitled to absolute immunity because they were functionally like a prosecutor’s and because the adversarial nature of the judicial process provided Gilliam with opportunity to challenge any of the caseworker’s representations or recommendations. We conclude the conduct complained of was investigative in nature and insufficiently tied to the judicial process to warrant a grant of absolute immunity.” The mother maintains here and in her initial brief that the court’s analysis here as to why absolute immunity should not be afforded to Gilliam, applies in our

case given Respondent Olson Gaines' failure to remotely conform with her court ordered role (same is noted to be true for Respondent Edward Schau) and duties assigned as a PE so that in effect, her 'performance' and output was "insufficiently tied to the judicial process to warrant a grant of absolute immunity." The *Gilliam* court at 581, citing *Butz v. Economou*, 438 U.S. 98 S.Ct. 2894, 57 L.Ed.2d (1978), noted, "Absolute immunity creates a risk that citizens will suffer irremediable wrong at the hands of those actors whom absolute immunity protects, but certain 'safeguards built into the judicial process' *tend to* reduce the risk." In pointing out several of these perceived 'safeguards,' the *Gilliam* court noted among them, "Advocates are restrained not only by their professional obligations but by their knowledge that their assertions will be contested by their adversaries in open court." Sadly and unfortunately, both Respondents here in our case were not "restrained by their professional obligations," and in fact completely disregarded them and their actions while "contested by their adversaries in open court" before Judge James Doerty, still led to the destructive and unwarranted removal of the child from his mother for an extended period of time. But for the final evaluation report of Respondent PP including reliance on the misguided and professionally bankrupt and discredited psychological evaluation and testing of Dr.

Edward Schau, such damaging removal of the child from his mother would never have occurred in the mother's view.

OC is by and largely correct in stating on page 14 of her responsive brief, that "the Appellant is requesting of this court to change the law and modify immunity afforded court appointed experts from absolute to qualified." More accurately, the Appellant is asking this court under a case of first impression, to find that consistent with the actual public policy intent of the Supreme Court, that a professional that so far strays from her or his court appointed tasks as argued above and in the Appellant's initial brief, is not entitled to absolute immunity and in fact when found for all intent and purposes to be well outside the role intended by the court in its appointment, is not even operating within the 'judicial proceedings,' and loses the protections afforded under the absolute immunity doctrine. We maintain that that is the case here for Respondent Olson Gaines as well as Respondent Edward Schau as argued below.

II. REPLY AS TO RESPONDENT EDWARD SCHAU

Counsel for Respondent Schau argues in her reply on page two that the mother is wrong in claiming that Dr. Schau did not carry out his court appointed duties; that he strayed from the scope of his appointed duties; that he did not follow professional and ethical standards; and that he perpetrated a fraud on the court. The mother maintains as she did in her

initial brief that these allegations are valid and that the evidence she has already offered fully support such claims. Counsel for Respondent Schau argues similarly (and poses similar Issues Presented by Assignment of Error) as did counsel for Respondent Olson Gaines as to why he believes his client should be afforded absolute immunity and the mother applies the same argument and reasoning here as she did with Respondent Olson Gaines.

On page five of the Responsive brief of Respondent Schau, his counsel notes, “Dr. Schau issued no opinion on Shir Khanloo’s actual parenting ability and made no recommendation on the issue of custody.” This claim is patently false as argued by the mother in her initial brief while providing exhibits from the Washington Department of Health Licensing (DOH) and Respondent Schau’s actual evaluations which indeed did castigate the mother’s parenting offered his opinion that the mother would engage in destructive parenting when the child was older based on no testing to support such a claim and while completing a de facto and highly inappropriate ‘parenting evaluation,’ as concluded by the DOH. OC’s claims in behalf of his client fall far short of reality as clearly argued and detailed in the mother’s initial brief.

To remind this court, in terms of Dr. Schau’s evaluation work completed for the PE as part of her work, Dr. Schau completed and issued

his initial Psychological Assessments of the parties in 10/09 (CP 24, Exhibit 6; CP 25) and admits to administering different psychological tests to the parties (CP 24, Exhibit 11, Trial Transcript of Dr. Schau), making any comparison between the parties invalid and professionally inappropriate as testified to by other expert professionals involved in the case (CP 24, Exhibit 4) and as eventually determined by the Washington Department of Health Licensing (DOL) which sanctioned Dr. Schau for these very same improprieties and stemming from this very case (CP 24, Exhibit 10). Dr. Schau was further sanctioned by the DOH for his engaging in a form of parenting evaluation without his ever having observed the mother (or the father) with the child or without ever have been assigned by the court to do so (CP 24, Exhibit 10, Exhibit 11; CP 25) and thus having no basis to conclude as to parenting skills and possible parenting problems. Further, Dr. Schau required what he termed 'Level II testing' for the mother and not for the father, thus making up his own professional standards for testing for which he was also sanctioned by the DOH which noted that there was no such legal or professional basis for any such 'Level II' (or even 'Level I) (CP 24, Exhibit 10). These terms and procedures were in fact made up by Dr. Schau and simply accepted by the PE without any investigation or concern. No such 'Level II' testing was ever given or required of the father. The DOH charges against Dr.

Schau and the settlement with sanctions against Dr. Schau by the DOH make it 100% clear that he strayed far from anything remotely approaching a professional psychological assessment and to his appropriate role as psychological evaluator (CP 24, Exhibit 10). Defendant Schau's testimonial transcripts validated his own negligence and violation of numerous ethical and practice standards. Like Respondent Olson Gaines, Dr. Schau utterly failed to carry out his court ordered duties in any manner remotely following ethical or professional standards, engaged in perjurious or false testimony, and strayed so far from the scope of his court appointment as to make his performance and output moot and apart from the actual 'judicial proceedings' he was legally required to conform to in order to be eligible for the granting of absolute immunity in the mother's view under *Reddy v. Karr* (and other related cases) as to absolute quasi-judicial immunity.

Despite the attempt by Respondent Schau's counsel to 'spin' the outcome otherwise, the DOH settlement documents (CP 24, Exhibit 10) related to Dr. Schau make it very clear that he violated almost every conceivable practice standard for Psychologists possible, including engaging in his own parenting evaluation *without directive or appointment by the court*, using inappropriate tests, engaging in clear bias against the mother, abdicating his professional role to Ms. Olson Gaines, violated

WAC 246-924-457 (scope of limited evaluations) , RCW 26.09.191 and WAC 246-924-445 as to discussion of limiting and cultural factors, etc. Thus he as well should not be afforded any protections under the immunity doctrine at issue here.

Counsel for Respondent Schau points to *Lallas v. Skagit County*, 167 Wn.2d 861, 225 P.3d 910 (2009) for support of Dr. Schau and notes, “To determine if immunity applies, courts look to the function being performed rather than the person who performed it.” We agree and continue to maintain that Respondent Schau utterly failed to carry out the function assigned to him by the court as clearly detailed by the DOH exhibits.

In contradiction to the claims made by counsel for Respondent Schau throughout his responsive brief, mother’s analysis in her initial brief and here as to her case law analysis certainly did address the fundamental issue and differences between various forms of immunity and their relevance to this case and order on summary judgment by Judge Doyle and no argument will be repeated here. Any claim by counsel for Respondent Schau that the DOH stipulated agreement signed and agreed to by Dr. Schau was somehow mischaracterized by this attorney, is pure fantasy, wishful thinking, and ‘spin,’ Professionals such as Dr. Schau stipulate to charges from the DOH precisely because they wish to mitigate

the ultimate damages and even more severe sanctions should such charges go to trial. There can be no doubt that Dr. Schau engaged in egregious violations as noted by the DOH and which again translate into his straying far afield from the duties assigned to him by the court and thus should lose any immunity absolute immunity protections that would normally be afforded to him.

OC for Dr. Schau curiously raises a compliant on page 17 that the mother “failed to prove proximate cause.” We in fact are asking for just such an opportunity at trial and can have no hope of dealing with such factual proof as to proximate cause and other suit related issues if this court does not reject the summary motion judgment of Judge Doyle. Again, we would look forward to such an opportunity at trial.

III. RELIEF REQUESTED

We believe without question that based on all of above, this court should overturn Judge Doyle’s decision granting Defendants MSJ and reinstate the trial so that Azita Shirkhanloo may be afforded an opportunity to present facts relevant to showing that her personal and constitutional rights were violated with great damage to herself and to her relationship with her child, in order to have an opportunity to be made whole from the egregious behavior and damage caused by the Defendants.

Respectfully submitted this 25th day of November, 2013 by:



Stuart E. Brown, WSBA #35928
Attorney for Appellant Azita
Shirkhanloo

COURT

NOV 25 2013

**The Court of Appeals of the State of Washington
Division I**

AZITA SHIRKHANLOO,

Appellate,

v.

**LAURIE OLSON-GAINES &
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Respondents.

Case No. 70336-6

(KING COUNTY SUPERIOR
COURT CASE NO. 12-2-18444-5 SEA)

**Return of Service/Declaration of
Service as to Ramona Hunter
and Craig Bennion, Attorneys
for Edward Schau, as to
Appellant's Reply Brief**

I Declare:

- 1. I am over the age of 18 years, and I am not a party to this action.
- 2. I served the following documents to:

RAMONA HUNTER, ATTORNEY AT LAW
 CRAIG BENNION, ATTORNEY AT LAW
 Cozen O' Connor Law Firm
 1201 3rd Ave., Suite 5200
 Seattle, WA 98101

APPELLANT'S REPLY BRIEF

3. The date, time and place of service were (if by mail refer to Paragraph 4 below):
--

Date: November 25, 2013 Time: Approximate Time: 9::30 am.
Address: 1201 3rd Ave., Suite 5200
Seattle, WA 98101

4. Service was made:

By delivery to the person named in paragraph 2 above (to the front desk of the law firm of the person noted in paragraph 2 above – see office stamp)

5. Service of Notice on Dependent of a Person in Military Service: NA

The Notice to Dependent of Person in Military Service was served on mailed by first class mail on (date) _____.

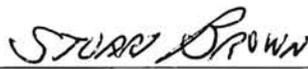
Other:

6. Other: NA

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

Signed at Seattle, WA on 11/25/13 by:


Signature


STUART E. BROWN

NOV 25 2013

The Court of Appeals of the State of Washington
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Case No. 70336-6

(KING COUNTY SUPERIOR
COURT CASE NO. 12-2-18444-5 SEA)

Return of Service/Declaration of
Service as to Pamela Andrews/
Attorney for Laurie Olson
Gaines as to Appellant's Reply
Brief

I Declare:

1. I am over the age of 18 years, and I am not a party to this action.

2. I served the following documents to:

PAMELA ANDREWS, ATTORNEY AT LAW
Andrews-Skinner Law Firm
645 Elliott Ave. West, Suite 350
Seattle, WA 98119

Appellant's Reply Brief.

3. The date, time and place of service were (if by mail refer to Paragraph 4 below):

Date: NOVEMBER 25, 2013 Time: Approximate Time: 9:30 AM

