

Appeal No. 75010-1-I

King County Superior Court No. 04-2-14443-4 SEA

COURT OF APPEALS
DIVISION I OF THE STATE OF WASHINGTON

ANDREW CLAYTON,

Respondent,

v.

MARY KAY WILSON,

Appellant.

RESPONDENT'S BRIEF

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DIVISION I
STATE OF WASHINGTON

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I. INTRODUCTION

This Court should affirm the trial court's Order Authorizing Sheriff's Execution Sale of Real Property (the "Order"). This case has a long history – both in the trial court and the appellate courts – but the current issue focuses on Mr. Clayton's right enforce his judgment against non-homestead and non-exempt real property owned by the judgment debtor and appellant, Mrs. Wilson.

Mr. Clayton has an unsatisfied judgment totaling in excess of \$2 million against Mrs. Wilson. She owns four (4) separate parcels of real property in Kenmore, Washington. Her long-time residence is located on one parcel; the other three (3) parcels contain separate residences that are currently unoccupied but have been historically used as single family residences and rental homes. Each one has a separate mailing address. Mr. Clayton has sought to enforce his judgment by way of a writ of execution against the three parcels that are not Mrs. Wilson's residence and which do not constitute homestead property. The trial court granted Mr. Clayton's motion for order authorizing sale of the three non-

homestead parcels, which Order expressly excluded Mrs. Clayton's actual homestead and residence. This appeal followed.

Mrs. Wilson seeks to frustrate Mr. Clayton's efforts to enforce his judgment by mischaracterizing her additional, neighboring parcels as homestead. The characterization is plainly wrong. So, too, is Mrs. Wilson's characterization of this action as one that implicates her Constitutional right to claim and protect her homestead. Mrs. Wilson has previously designated her homestead property as her residence, both by automatic operation of the law and by her affirmative representations to the court, and that property remains unaffected by the Order. Her homestead remains fully intact, with all statutory protections available to her should enforcement be taken against it. Mrs. Wilson's appeal is one more effort (in a long line of efforts) to delay Mr. Andrew Clayton's right to enforcement of his judgment. The trial court properly ruled on the Order and this Court should affirm the trial court's Order authorizing sale of Mrs. Wilson's three (3) parcels of non-exempt, non-homestead property.

II. COUNTER-STATEMENT OF THE CASE

A. Judgment Against Mrs. Wilson

Mr. Clayton, respondent, was awarded judgment in the principal sum of \$1,420,187.20 (“Judgment”) on February 26, 2006, against Mr. Wilson, and the marital community comprised of Mr. and Mrs. Wilson. The Judgment and claims against the Wilson’s marital community arose from six years of sexual abuse perpetrated by Mr. Wilson against Mr. Clayton when he was a child employed by the Wilson household. See Clayton v. Wilson, 145 Wash.App. 86 (2008).¹ Prior to entry of the Judgment, but after discovery of the claims giving rise to it, Mr. and Mrs. Wilson divvied up the Wilsons’ community property, with nearly all property being transferred to Mrs. Wilson in her individual capacity. The trial court ordered that the Wilson’s (former) marital community property assets be frozen and that the transfers to Mrs. Wilson as her separate property be voided. CP 140-143 (Amended Judgment). The trial court further ordered that Mrs. Wilson was “enjoined from further disposition or encumbrance of any assets distributed as part of their property settlement

¹ Mr. Clayton’s family rented a home from the Wilsons and at the time of the abuse actually lived in one of the homes Mrs. Wilson now seeks to add to her homestead. CP 110.

agreement and dissolution decree that were formerly community property...[and the Wilsons] must obtain an order from this court to dispose or encumber such property;” CP 142. Mrs. Wilson has not obtained any such order.

B. Mr. Clayton’s Enforcement Action

Mr. Clayton initiated action to enforce his Judgment by way of a Writ of Execution on Real Property (“Writ”) directed to the King County Sheriff. CP 174-175. The Writ was sought after exhaustive efforts to reach settlement with Mrs. Wilson ultimately failed. Prior to issuance of the Writ, Mr. Clayton (through his counsel) submitted the required Declaration of Due Diligence pursuant to RCW 6.17.100(3) which set forth the required recitations. CP 144-145. The Writ was delivered to the Sheriff and Mr. Clayton subsequently moved the Court for an Order authorizing the Sheriff’s sale of the three non-homestead parcels. CP 155.

Mrs. Wilson owns four (4) separate but neighboring parcels in Kenmore, Washington. One is her residence, located at 7636 NE 165th Street, Kenmore, WA (“Kenmore Residence.”) It is the former family home of the Wilsons and has been Mrs. Wilson’s primary residence for

decades. The other three (3) parcels are improved properties, with single family residences on them, and separate mailing addresses.² Mr. Clayton requested the trial court authorize sale of the three non-homestead parcels pursuant to his Writ. Mrs. Wilson's residence and homestead – the Kenmore Residence – was not subject to Mr. Clayton's motion or Writ.

Mrs. Wilson opposed the motion. In doing so, she submitted a declaration that stated, in part: "One of the parcels is my primary residence and I declared it as my homestead by proper filing in King County, Washington."³ CP 209. Notwithstanding, Mrs. Wilson argued that she was entitled to claim not only her residence as homestead, but also the three neighboring parcels, which she admittedly never claimed as homestead property. *Id.* Mrs. Wilson asked the trial court to deny the motion and force Mr. Clayton to participate in mediation; she also sought to assert a separate property interest/lien upon the three parcels subject to

² The other three parcels are: 7324 NE 165th Street, Kenmore, WA; 7722 NE 165th Street, Kenmore, WA; and 7724 NE 165th Street, Kenmore, WA. CP 180-194 (Exh F to Decl. in Support of Motion for Order Authorizing Sale.) King County Department of Assessments lists each property as having a highest and best use as a single family residence, and states that each one has a present use as single family residence.

³ Mrs. Wilson has since sought to retract that statement indicating while she believed at the time that she had submitted a declaration of homestead, she has since determined that no such filing was made. As discussed below, the filing is not necessary, but Mrs. Wilson's historical intent is illuminating.

sale. CP197. On review of the parties' pleadings, the trial court granted Mr. Clayton's motion and issued the Order authorizing sale. CP 225. The Sheriff scheduled the public sale of the three non-homestead parcels for May 20, 2016.

Thereafter, Mrs. Wilson filed a Notice of Appeal of the "Order Authorizing Sheriff's Execution Sale of Real Property entered on March 16, 2016" but did not file a supercedeas bond pursuant to CR 62 or RAP 8.1. CP 227. She filed an Emergency Motion for Stay Pending Appeal with this Court, which Mr. Clayton opposed. After oral argument, Commissioner Mary Neel entered an order June 23, 2016, granting the stay without filing of a supercedeas bond conditioned, in part, on Mrs. Wilson expeditiously pursuing her appeal.

III. ARGUMENT

A. Standard of Review

Whether Mrs. Wilson's homestead has been protected where her Kenmore Residence but not the neighboring residences are excluded from execution is a question of statutory interpretation. The meaning of a statute is a question of law reviewed *de novo*. State, Dep't of Ecology v.

Campbell & Gwinn, L.L.C., 146 Wash. 2d 1, 9, 43 P.3d 4, 9 (2002). “The fundamental objective is to ascertain and carry out the Legislature’s intent...” *Id.* Here, because the trial court’s order complies with RCW 6.13 and 6.17, the order should be affirmed.

B. Mrs. Wilson’s Homestead Claim Remains Fully Intact; The Parcels Subject to Sale Are Not Homestead

1. Mrs. Wilson’s Homestead is Not Subject to the Order Authorizing Sale

The trial court’s properly ruled that the three neighboring parcels, adjacent to Mrs. Wilson’s residence, were non-homestead property and subject to sale under Mr. Clayton’s Writ. Mrs. Wilson’s homestead property was not and is not subject to the Writ or Order authorizing sale of real property, and as such, there was no basis under which the trial court would invoke the procedures of RCW 6.13 *et seq.* Mrs. Wilson assertion that her homestead consists of not only her actual residence and homestead but also the neighboring properties is a misplaced attempt to impermissibly expand the definition and application of “homestead” under Washington law.

RCW 6.13.010 provides that an automatic “homestead consists of real or personal property that the owner uses as a residence.” An automatic homestead is presumed by the mere fact of ownership and residence in or upon real property. RCW 6.13.040. A “homestead declaration” may be recorded in order to declare a homestead exemption, however, in doing so an owner who resides elsewhere must record a declaration of abandonment of the residence property. *Id.* Accordingly, an owner may only claim *one* residence as homestead property. This makes sense because it serves the purpose of the homestead exemption, which is to protect the public policy interest of ensuring shelter to individuals and families, while at the same time allowing legitimate creditors the ability to pursue those non-residence assets in satisfaction of judgment. *See Burch v. Monroe*, 67 Wash. App. 61, 64, 834 P.2d 33, 34 (1992) (purpose of homestead statutes is to ensure “shelter for families” and protect property in the “interest of humanity.”)

It is undisputed that a judgment debtor is entitled to protect her homestead pursuant to Washington law. Here, Mrs. Wilson is permitted to claim the Kenmore Residence as her homestead property. Since she owns

and resides at the Kenmore Residence she enjoys an automatic homestead upon the Kenmore Residence pursuant to RCW 6.13.040. A declaration of homestead is not required.⁴ Throughout the course of this litigation, Mrs. Wilson has consistently maintained that the Kenmore Residence is her homestead property. For example, Mrs. Wilson's proposed Findings of Fact and Conclusions of Law set forth a detail explanation and acknowledgement of the manner in which the Wilson's had divided their property when Mr. Wilson was arrested, categorizing the Kenmore Residence as her home and homestead property, and the other three properties as rentals or as Mr. Wilson's homestead. CP 58. The Kenmore Property is described as the "Marital Home" upon which Mrs. Wilson would have a homestead exemption, while the other three properties (the ones now subject to Mr. Clayton's Order authorizing sale) were characterized as "Home Next Door to Marital Home...", "Contiguous Rental Home...", and "Contiguous Rental Home..." *Id.*

⁴ Mrs. Wilson has sought to supplement the record with her research indicating a declaration of homestead has *not* been filed with respect to the Kenmore Residence, though she had previously declared that she had executed such a document. Whether such evidence is permitted or not, Mrs. Wilson's intent has clearly been to claim the Kenmore Residence as her homestead, and the attempted addition of the other parcels at this juncture is opportunistic and obstructionist.

There is no basis in law or fact for Mrs. Wilson to now claim these *additional* parcels as homestead. While it is true that in the case of a dwelling house, a homestead includes the dwelling and appurtenant buildings “and the land on which the same are situated and by which the same are surrounded...” this definition does not afford a debtor an indefinite ability to add bordering properties to a homestead in an effort to frustrate execution. RCW 6.13.010(1). Mrs. Wilson automatically enjoys a homestead on her actual residence, which is why it was excluded from Mr. Clayton’s Writ from the outset. She does not have such a claim to the neighboring properties, each of which have their own mailing addresses and have historically been rental homes or occupied by other individuals or families. The fact that Mrs. Wilson represents that no one else occupies those residences *now* does not change the fact that her statutory homestead protection attaches only to that property on which she actually resides and which she admittedly – and exclusively – claimed as her homestead.

The *Baker* case on which Mrs. Wilson so heavily relies is not the sweeping mandate that Mrs. Wilson would like it to be. In *Baker*, the court noted that previous case law reviewed (which Mrs. Wilson also

relies upon) was instructive because the “use and enjoyment of a residence includes the surrounding property. They together, make up the homestead.” *Baker v. Baker*, 149 Wash. App. 208, 212, 202 P.3d 983, 985 (2009). And in that case the court sought to “give effect to our legislature’s use of the term “land... by which the same are surrounded” and ordered that Mr. Baker’s neighboring, contiguous parcel be included in his homestead.

But the property Mrs. Wilson seeks to add here does not qualify as merely “surrounding property” or “appurtenant buildings” as contemplated by the case law and the statute. Here, the neighboring properties are not mere *land* but are separate parcels, with separate addresses, and on which separate residences are located. These are not merely “appurtenant buildings” such as the garden, orchard, chicken run, etc. that were deemed part of a homestead in *Morse v. Morris*, 57 Wash. 43, 106 P. 468, 468 (1910). Nor is this a situation where the property truly

consists of a single tract purchased for a home as in *In re Murphy's Estate*, 46 Wash. 574, 90 P. 916 (1907).⁵

Mrs. Wilson provides zero authority to support her claim that the homestead statute allows her to add property to her already designated homestead. The sanctity of Mrs. Wilson's homestead as contemplated by RCW 6.13.010 is well protected by the exemption and designation of the Kenmore Residence as homestead. There is no question that the Kenmore Residence is excluded from the Order, and there is no merit to her claim that additional parcels are subject to the same homestead protection.

2. Recording of Mr. Clayton's Judgment Is of No Effect On Mrs. Wilson's Homestead Claim

RCW 6.13.090 states that: “[a] judgment against the owner of a homestead shall become a lien on the value of the homestead property in excess of the homestead exemption from the time the judgment creditor records the judgment with the recording officer of the county where the

⁵ Notably, the *Murphy* court considered the equities behind a homestead claim when determining that the widow, who had been driven from her home by her husband, should be allowed the full tract as her homestead when it noted that “[i]t would be a travesty on justice to now hold that she has been deprived of her rights by the inexcusable and cruel conduct of her husband.” 46 Wash. at 577. The equities in this case favor Mr. Clayton, and not Mrs. Wilson in her attempt to prevent enforcement of his Judgment by impermissibly adding multiple residences to her homestead.

property is located...” Nothing in the statute *creates* a right of homestead by way of a judgment creditor’s recording. Yet that is precisely what Mrs. Wilson would have the court believe – that a judgment creditor recording a judgment is the means by which homestead property is identified or otherwise designated. This is a plain misrepresentation of the statute and the law as it relates to homestead property.

It is true that entry of a judgment serves as constructive notice of a judgment lien on all real property the judgment debtor owns in the county where the judgment was entered. RCW 4.56.200. Accordingly, a judgment creditor is not required to further record a judgment in order to create a judgment lien on the property a judgment debtor owns. But a prudent creditor who seeks to ensure actual notice of a judgment lien by recording the same does not thereby change the nature of a debtor’s real property. Further, because a judgment debtor is free to change their homestead by appropriate filing or other actions, a judgment creditor is wise to record a judgment against any residential property a debtor owns. RCW 6.13.040 (2) (“An owner who selects homestead from unimproved or improved land that is not yet occupied as homestead must execute a

declaration of homestead....However, is the owner also owns another parcel of property on which the owner presently resides...the owner must also execute a declaration of abandonment of homestead on that other property...”) Mr. Clayton’s recording of the judgment against each of the parcels does not change Mrs. Wilson’s non-exempt real property into protected homestead property.⁶

3. Homestead Exemption Procedures Not Required When Homestead Isn’t Subject to Writ

Because the Kenmore Residence and the entire parcel on which it sits are excluded from the Order authorizing sale, Mrs. Wilson is not entitled to any homestead related procedures under RCW 6.13. Only in the event Mr. Clayton seeks to enforce his Judgment upon her actual homestead, the Kenmore Residence, is Mrs. Wilson entitled to invoke those requirements. Such is not the case here.

C. Writ of Execution Was Properly Issued

1. Challenge to the Writ and Declaration of Diligence Are Not Properly Before the Court

⁶ Nor does it entitle her to expand the statutory right to claim a homestead on her primary residence to claiming a homestead on *multiple* residences, which is what she is attempting to do here.

This Court may decline to consider an issue raised for the first time on appeal. *Sorrel v. Eagle Healthcare, Inc.*, 110 Wn. App. 290, 299, 38 P.3d 1024 (2002) (appellate court may decline review of issue not presented to trial court); RAP 2.5(a) (“The appellate court may refuse to review any claim of error which was not raised on in the trial court.”) Here, Mrs. Wilson failed to raise any challenge or objection to either the sufficiency of the Declaration of Due Diligence submitted to the clerk, or the issuance of the Writ of Execution on Real Property. In fact, the only trial court order included in Mrs. Wilson’s notice of appeal was the Order Authorizing Sheriff’s Sale of real Property entered March 16, 2016. CP 227. Accordingly, the Court may choose not to consider Mrs. Wilson’s untimely challenge to the Writ.

2. All Prerequisites For Issuance of Writ of Execution Were Met

There are minimal statutory requirements for issuance of a writ of execution, and those requirements were properly met when the clerk of the trial court issued the Writ of Execution against Mrs. Wilson’s non-homestead real property. RCW 6.17.090 provides that all property “real and personal, of the judgment debtor that is not exempt by law is liable to

execution.” Before a writ of execution may issue on any real property, RCW 6.17.100 requires the judgment creditor file an affidavit with the court stating that due diligence has been completed to ensure that the judgment debtor does not have sufficient personal property to satisfy the debt owed to judgment debtor. It further requires that a judgment creditor include a statement as to whether the property is occupied as debtor’s homestead. *Id.* RCW 6.17.100 sets forth a formula and information that *may* be included to show due diligence. Other than the declaration, there are no other statutory prerequisites to issuance of a writ of execution under RCW 6.17.

Application of the due diligence statute is intended to eliminate any possibility that one's home will be sold to satisfy a small debt. *Meibach v. Colasurdo*, 102 Wash. 2d 170, 179, 685 P.2d 1074, 1080 (1984) (analyzing the prior “due diligence” statute, RCW 6.04.035); *Casa del Rey v. Hart*, 110 Wash. 2d 65, 73, 750 P.2d 261, 265 (1988) (“Clearly this interpretation now applies to RCW 6.17.100, which incorporates all of the substantive language of former RCW 6.04.035.”) In *Meibach*, a judgment debtor’s home was sold (after entry of a default judgment)

pursuant to a writ of execution to enforce a judgment of a mere \$1,150.24. The court ultimately set aside the sheriff's sale based on the inequity of the circumstances, including (but not exclusively) based upon due diligence failure.

Mr. Clayton filed a Declaration of Due Diligence ("Declaration") in this matter on December 10, 2015. CP 144-145. The Declaration, executed by trial counsel, stated that judgment creditor had conducted due diligence to determine that judgment debtor did not have sufficient personal property to satisfy the Judgment, that judgment debtors did not occupy the real property, and that no declaration of homestead or non-abandonment had been filed on the subject real property. *Id.* The Declaration is admittedly brief, however, Mrs. Clayton's attack on it is notably devoid of any allegation that the Declaration is inaccurate. She does not allege that a) she resides on the subject real properties (notwithstanding her current argument that neighboring residences are her homestead property as well); b) that she has sufficient personal property to satisfy the Judgment, plus interest, which currently totals in excess of \$2 million dollars; c) nor that her co-debtor Mr. Wilson has such personal

property. Indeed, each of these points are demonstrably false based simply on the record of this case, including, but not limited to Mrs. Wilson's own proposed Findings of Fact and Conclusions of Law which set forth a full list of all real and personal property owned by Mr. and Mrs. Wilson, and the value of such property at the time of their dissolution in 2002.⁷ CP 58-60. This information, taken in conjunction with the Judgment (prohibiting Mrs. Wilson from transfer or encumbrance of the real property) and Mrs. Wilson's own declaration submitted in opposition to Mr. Clayton's motion authorizing sale of the real property, wherein she explains that she lives at the Kenmore Residence and the remainder of the property is unoccupied, unequivocally establish that such assertions would be erroneous.

Mrs. Wilson's ethical attacks on trial counsel's declaration are not well taken. As set forth above, the fact of separate parcels and residences sharing a common border *does not* make them into a single, expansive

⁷ Mrs. Wilson may counter this argument by asserting that her situation must be drastically different today, given the passage of time since the proposed findings were submitted, but given size of the Judgment and the circumstances of the same, there is no feasible way Mrs. Wilson's personal property would be sufficient *now* to satisfy the Judgment, when it was not sufficient at the time of entry.

homestead parcel. Mrs. Wilson had previously identified the Kenmore Residence as her homestead, and counsel was under no obligation to dispute or further explain that in the Declaration.

However, if the court were to determine that the Declaration was not sufficient, reversal would still not be warranted. Where Mrs. Clayton cannot show that any portion of the Declaration was *inaccurate* and where the execution sale has not yet taken place, she cannot show any prejudice that would permit reversal of the trial court's Order. *See Thomas v. French*, 99 Wn.2d 95, 104, 659 P.2d 1097 (1983), *review denied*, 142 Wn.2d 1018 (2001) (error without prejudice is not grounds for reversal); *Portch v. Sommerville*, 113 Wn.App. 807, 810, 55 P.3d 661 (2002) (“in order for the error to be reversible, the appellant must demonstrate prejudice”). Should the Court determine any action be necessary with respect to the Declaration, the appropriate remedy would be to order an amended Declaration be filed, filling in the details that are conclusively established through the court record. To hold otherwise, and indulge Mrs. Clayton's position that the Writ should be quashed, would be to exalt form

over substance and would serve no beneficial purpose to the protections embodied in RCW 6.17.100.

D. No Equitable Lien or Separate Property Interest Exists, As They Are Prohibited By Court Order

The non-homestead parcels subject to the Order authorizing sale are incontrovertibly part of the Wilson's former marital community property, and therefore subject to Mr. Clayton's Judgment. The question of whether Mrs. Wilson may protect those assets of the former marital community by way of an equitable lien or separate property claim has conclusively been answered in the negative. In *Clayton v Wilson* this Court said:

Because Andrew was a known creditor at the time the Wilsons agreed to divide their property, Mr. Wilson did not receive reasonably equivalent value, the division rendered Mr. Wilson insolvent, and the Wilsons did not prove that the transfer was made in good faith, the trial court's conclusion on the various theories of fraudulent transfer are adequately supported. The remedy of voiding the transfer and freezing the assets was properly imposed.

145 Wash.App. 86, 102 (2008). The Supreme Court agreed stating that "[u]nder the UFTA these factors overwhelmingly suggest fraudulence in the transfer [of all the Wilson community property]." *Clayton v. Wilson*,

168 Wash.2d 57 (2010). Accordingly, on remand, the trial court ordered that Mrs. Wilson was enjoined from disposing of or encumbering the former community property – which includes the non-homestead parcels subject to the Order – without permission of the trial court. (The Amended Judgment provides that Mrs. Wilson was “enjoined from disposition *or encumbrance of* any assets...that were formerly community property...” CP 142 (emphasis added).) She has obtained no such permission from the trial court. Therefore, Mrs. Wilson has no right to claim that the non-homestead property is encumbered in any way, by either an equitable lien or a separate property interest.

Mrs. Wilson’s reliance on *Farrow v. Ostrem*, 16 Wash. 2d 547, 548, 133 P.2d 974, 975 (1943) is misplaced. In *Farrow*, there was no fraud and no avoidance of the transfer. Rather, the Court determined that the judgment creditor had an equitable lien that attached to the property when it was still community property and such a right survived the quit claim deed between spouses. The wife also had an equitable claim for certain contributions she had made with respect to the property, which right arose before execution of the quit claim. But in the present case, the

trial court's order enjoining Mrs. Wilson from encumbering the property without court authorization so long as Mr. Clayton's judgment went unpaid precludes her from claiming any separate interest either by contribution or by appreciation.

Even assuming *arguendo* that Mrs. Wilson did have a separate property interest for amounts she demonstrably expended on the property, that would still not provide any basis on which to reverse the trial court's Order, because it would not limit Mr. Clayton's right to cause the sale of the sale of the properties by way of a writ of execution. If Mrs. Wilson had a valid lien claim (which she does not) it would be one that arose subsequent to Mr. Clayton's judgment lien, and therefore would be subordinate to the same. The extent of her claim would, at best, give her a right to claim an interest in any excess proceeds from the sheriff's sale upon a determination by the trial court *following* the sheriff's sale in the event excess proceeds were generated. RCW 6.17.140(4) (Any excess proceeds will be delivered to the clerk of the court for payment of such sums to those "interests in, or liens against, the property eliminated by the sale in the order of priority that the interest, lien or claim attached to the

property, as determined by the court.”) It would not give her the ability to block enforcement of the Writ or Order authorizing sale. Mrs. Wilson would have in excess of a year to quantify and obtain an order regarding amounts she claimed to be owed. But nothing about such a claim provides a basis for delaying the sale itself because even if she did have a separate property interest, that interest is merely an equitable, subordinate lien.

IV. CONCLUSION

For the reasons set forth above, Mr. Clayton respectfully requests that the Court affirm the decision of the trial court authorizing sale of Mrs. Wilson’s non-exempt, non-homestead real property, and allow Mr. Clayton to proceed with enforcement of Judgment.

Signed this 1st day of August, 2016.

By: 

Elizabeth Hebener Norwood, #40930

CERTIFICATE OF SERVICE

The undersigned certifies under penalty of perjury that I caused the delivery of a true and correct copy of the forgoing RESPONDENT'S BRIEF to be delivered as follows:

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2016 AUG - 1 PM 2:17
COURT OF APPEALS DIV. 1
STATE OF WASHINGTON

Signed this 1st day of August, 2016 at Seattle, Washington.

By: 

Elizabeth Hebener Norwood