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COURT OF APPEALS
DIVISION II
2014 AUG 20 PM 1:03
STATE OF WASHINGTON
BY  DEPUTY

NO. 45604-4-II

IN THE COURT OF APPEALS OF THE STATE OF WASHINGTON,

DIVISION II

JOHN R. TONEY,

Appellant,

vs.

KEVIN T. MITCHELL and KIMBERLY S. MITCHELL

Respondents.

REPLY BRIEF OF APPELLANT

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I. SUMMARY OF ARGUMENT

This court should not entertain respondent's summary of argument as it is overflowing with misrepresentations of the actual facts of the case at hand.

A. The first event was the Honorable Judge Evans informing the parties that time was set aside to address Motions in Limine and by Toney issue No. 7 the court had opened the door for the defense to present evidence as to Causation, which was the apparent onset of the Frye standard Frye v. United States, 293 F. 1013 (1923) (a criminal case), by the court without notice to Toney. The court inserting his personal opinion and apparent lack of knowledge concerning the practice of Chiropractic in Washington state further precluded Toney from an opinion on causation with regards to his injuries which is inconsistent with the law on Chiropractic in Washington. Toney is not a licensed Chiropractor in Washington and is not bound by the restrictive licensure, but is free to use his entire education and knowledge gained in his 65 years which is far greater than any human health knowledge that counsel Lillegren or the court posses. Toney never sought to testify as a Chiropractor or treat the general public as a Chiropractor, but to testify upon knowledge and experience (ER702) gained in college, almost twenty years of active practice, post graduate

studies and literary articles. Toney does hold a certificate for basic sciences from the Medical University of Vermillion South Dakota.

B. Next the court inquired as to whether Toney believed that Frye applies in Washington, now we are engulfed in the Frye issue by the court without notice to Toney that a Frye test examination would be heard.

C. As the court proceeded to hear Lillegren's No. 6 & 7 medical causation became the major issue between the court and Toney, with Toney informing the court of the Anderson v. AKZO Nobel Coatings case law and the court reviewed the case and stated that "...it's a basically Frye case, in that it's somewhat not directly on point,.... And the court further states that "He didn't use the Magic words." (VR 73) referring to Dr. Davis's opinion.

D. The court took the same erroneous position concerning Dr. Hodgson expert opinion

testimony and as a basis of denying Toney's medical experts on causation the court stated: "So, I – I'll grant the motion for – I'm not sure if it's a motion for dismissal – I think – I think it is a motion for dismissal because there's inadequate evidence to go to the jury. I think that's what it is, but I'm not sure; but the net effect is that."

The record clearly reflects that NO motion to dismiss was made by either party.

II. ARGUMENT

A. Argument for Respondents Answers to First Assignment of Error

1. The court should consider the appellants first claim of error as respondents statement concerning the court properly deciding not to apply the Frye standard is totally without merit and inaccurate when one examines the verbatim report and admissibility of expert testimony and causation, (As a side note it is of some importance that counsel has refused to return the verbatim report so I could use it to complete my reply brief after 4 phone calls and messages.)

2 &3. The trial court did not properly exercise discretion by excluding plaintiff's expert witnesses Dr's Davis and Hodgson applying the strict standard of Frye when Anderson was the correct standard, but allowing respondents experts, without any showing of expertise in the subject matter before the court. The court further held a Frye hearing without prior notice to Toney.

4. Error No. 4 should be considered by the court as the verbatim report is a clear indication of the trial courts bias and prejudice towards Toney as a Chiropractor and litigant by the court moving from a Motion in Limine to conducting a Frye hearing and subsequent dismissal of the action all

without notice to Toney and disposing of the case in entirety all in violation of Toney's Constitutionally protected Due Process rights.

5. The court should consider the trial court's error of dismissing the case based upon a finding of causation, a Frye Standard that is no longer the standard in civil litigation in Washington after Anderson v. AKZO Nobel Coatings which Toney properly informed the court of, the court rejected Anderson, followed Frye and rejected Toney's experts dismissing the case and did not allow Toney to be heard on the matter which is an absolute right under the Due Process clause of the U.S. and Washington state Constitutions.

ARGUMENT

III. ARGUMENT TO ANSWER TO FIRST ASSIGNMENT OF ERROR

1. Respondent is simply trying to confuse the issue before the court as to the court's decision not to conduct a Frye Hearing, that is simply not true the court did conduct a version of a Frye hearing (VR 69) The court did make rulings that Dr's Davis and Hogdson and Toney would not be able to establish causation of the alleged injuries with "magical words".

Respondent's citation of State v. Kirkman 159, Wn. 2d 918, 926, 155 P3d.

125 (2007) is incorrect, the quotation is from State v. Tolias, 135 Wash. 2d. 133, 140 954 P2d. 907 (1998)

The general rule is that appellate courts will not consider issues raised for the first time on appeal. However , a claim of error may be raised for the first time on appeal if it is a manifest error affecting a constitutional right RAP 2.5 (a) (3).

State v. Walsh, 143 Wash 2d. 1,7,17 P 3d. 591 (2001). The defendant must identify a constitutional error and show how the alleged error actually affected the defendant's rights at trial. It is this showing of actual prejudice that makes the "error" manifest, allowing review. McFarland 127 Wash.2d. at 333, 899 P2d. 1251; Scott 110 Wash. 2d. at 688, 757 P2d. 492.

Toney contends that the requirements of manifest error were made and may be raised on appeal as the case was dismissed in total, and alleged violations of Article 1 section 3 of the Washington constitution and 10 of the Washington constitution were made satisfying the requirements of RAP 10.3 (a) (6). If the court was to determine that the requirements were not met then.

State v. Olson Wn. 2d. 315, (1995) [1] An appellant's failure to assign error in strict compliance with RAP 10.3 (a) (3) does not in itself, preclude an appellate court's consideration of the issue.

State v. Fortun 94 Wn 2d 754

[2]. Absent compelling reasons not to do so , an appellate court should exercise its discretion under RAP 1.2 (a) to decide a case on it's merits despite the appellant's technical violations of the Rules of Appellate Procedure.

The court should consider Toney's first assignment of error as Anderson v. AKZO Nobel Coatings 172 Wn. 2d. 593, 260 P 2d. 857 (2011) is the standard for civil litigation in Washington State and no longer Frye and the trial courts dismissal based upon medical causation is inconsistent. Respondents comment that page 16 is missing is puzzling at best, as respondent was served with three copies of Toney's opening brief two duds and one filed copy, I would assume office staff lost one copy but not three.

IV. NO. 2 "The Trial Court Properly Decided Not to Apply Frye When Considering Whether to Exclude Plaintiff's Expert Causation Testimony in Support of his injury Claims."

Respondents contention that the court did not apply Frye is without merit (VR 43, 44, 50)

The matter of Toney v. Mitchell was set for trial for September 17, 2014, with both parties filling Motions in Limine which resulted in the dismissal of the entire lawsuit upon entry of the Final Order and Judgment of September 30, 2014, from which this appeal is based.

State v. Hill, 331 S.C. 94, 501 S.E. 2d. 122 (1998) A ruling on a motion in Limine is not a final ruling because, at least in theory, it is subject to change based on developments during trial.

The Motion in Limine hearing morphed into a quasi Frye hearing wherein respondents counsel proceeded to conduct a full Frye type hearing to disqualify Toney's expert witness's without notification of a Frye hearing to either Toney or the Court and ended as an unnoticed motion for Summary Judgment and dismissal of the action.

Rice v Kelly, 483 So. 2d. 559, 560(Fla. DCA 1986) (cautioning " trial courts not to allow 'motions in limine' to be used as unwritten and unnoticed motions for partial summary judgment or motions to dismiss").

When a motion in limine disposes of an element of a parties claim or defense, granting the motion constitutes harmful error unless the timing provisions of the rule governing summary judgment is complied with and the standards for such a judgment are satisfied. Low Save Ctrs., Inc. v. Gilnert, 547 So. 2d. 1283, 1284 (Fla. 4th. DCA 1989.

Toney contends that the court did commit "Manifest Error " by conducting a Motion in Limine hearing and allowing counsel to turn it into a Frye Hearing without notification or notice and an opportunity to present testimony by the experts. RAP 2.5 Errors Raised for First Time on Review. The appellate court may refuse to review any claimed error which was not raised in the trial court. However, a party may raise the following claimed errors for the first time in the appellate court: (3).

Manifest error affecting a constitutional right. Article 1 section 3
PERSONAL RIGHTS No person shall be deprived of life, liberty, or property, without due process of law. Section 10 ADMINISTRATION

OF JUSTICE. Justice in all cases shall be administered openly , and without unnecessary delay.. Toney’s constitutional right to a fair and impartial trial was violated by the court dismissing the suit without being heard on the issues before the court.

Counsel’s assertion that Toney waived any right to a claim of error under : RAP 10.(3) (a) is based upon his one sided opinion 1.2

INTERPETATION AND WAIVER OF RULES BY COURT (a)

Interpretation . These rules will be liberally interpreted to promote justice and facilitate the decision of cases on the merits, cases and issues will not be determined on the basis of compliance or noncompliance with these rules except in compelling circumstances where justice demands, subject to the restrictions in rule 18.8 (b).

The court should find that the trial court erred in dismissing the case and remand the case to be heard on the merits.

VII. No. 3. The Trial Court ‘s excluding Toney’s Expert Witnesses with Regards to Causation and the court’s lack of understanding of Anderson:

Counsels claim that “the trial did not err in deciding not to apply the Frye test because the proffered evidence was not novel Scientific evidence”

See *In Re Detention of Halgren* Wn. 2d. 795, 806, 132 P.3d. 714 (2006) (“the Frye test allows a court to admit novel science only if the evidence is generally accepted in the relevant scientific community.”) “[T]he Frye test is unnecessary if the evidence does not involve new methods of proof or new scientific principles.” *Id.*

However the court did rely on the Frye test to exclude Toney’s expert witness (VR 73-77) “So, in my mind, there’s – there’s a lack of opinion on causation and so I will grant the exclusion of Dr. Joe Davis, his testimony as related to causation.” “—so, I think based on that, again, the issue of causation is certainly, at least in my view, it’s lacking. So, because of that issue, I’ll grant the Motion to Exclude Dr. Hodgson’s testimony as to causation.”

At “(VR 71-72) THE COURT: Okay, so, Just taking a look at that Anderson case, you know, it talks a lot, it’s – It’s basically a Frye case, in that it’s somewhat not directly on point, but I think it highlights some important points of law that are well – settled in Washington. One is that the trial court has a gate keeping role and must decide if evidence is admissible, number one; it must take a look at, whether – look at probative value, relevance, and also the appropriate standard of probability, which is kind of the issue we are talking about here – is the reasonable degree of medical certainty, or what they call “reasonable medical probability.”

And there -- in the law, there -- there's certain things we call "magic word" -- "Magical words"... Toney has made a diligent search of the law and dictionary and has been unable to find any magical words.

The Supreme Court in *Sacred Heart Med. Center v. Department of Labor and Indus.* 92 Wash. 631, 636 – 37, 600 P2d. 1015 (1979) discussed the testimony required to satisfy this element as follows:

It is sufficient if the medical testimony [s] hows the casual connection. If, from the medical testimony given and the facts and circumstances proven by other evidence, a reasonable person can infer that the casual connection exists, we know of no principle which would forbid the drawing of that inference.

This rational is totally without merit, that Dr's Davis and Hodgson are not able to make a casual connection between the injuries and sustained by Toney and Mitchell's gunfire noise. The respondent provided no expert opinion that would indicate that Toney's experts were incorrect or that they were not qualified to render a opinion as to the probability of Toney's injuries originating from gunfire noise and the court itself stated (VR 90) the court: Okay, Thank You. Okay, a couple of things: I tend to agree. I mean, I don't think anybody can argue that gunshots can cause damage; but , the question becomes at what level, at what frequency? And, so, we get into details.

These statements by the court clearly indicate lack of understanding of the subject matter before the court or extreme prejudice on the part of the court. The court knew that DSA engineering, Kerry Standlee had provided sound studies and was prepared to testify to the noise levels generated by Mitchell's gunfire noise and had filed a preliminary report (exhibit 1)

The record reflects that the court did apply the Frye test to the out of context wording of counsels argument for Motion in Limine 6 & 7 (VR 72-77) see *Anderson v. AKZO Nobel Coatings, Inc.* 172 Wn. 2d 593 260 P3d. 857 (2011).

The *Anderson* court noted:

This court has consistently found that if the science and methods are widely accepted in the relevant scientific community, the evidence is admissible under *Frye*, without separately requiring widespread acceptance of the plaintiff's theory of causation. See, e.g., *Gregory*, 158 Wn.2d at 829, 147 P.3d 1201; *Copeland*, 130 Wn.2d at 255, 922 P.2d 1304; *Reese*, 128 Wn.2d at 309, 907 P.2d 282; *Cauthron*, 120 Wn.2d at 887, 846 P.2d 502. Of course the evidence must also meet the other evidentiary requirements of competency, relevancy, reliability, helpfulness, and probability.¹⁴

Once the *Frye* standard is satisfied, the evidence must still satisfy the two-part inquiry

under ER 702. The expert witness must qualify as an expert, and the testimony must be helpful to the trier of fact.¹⁵ Expert testimony will be helpful to a jury only if its relevance has been established.¹⁶

VII. No. 4. Argument for Respondents B. ANSWER TO SECOND

AND THIRD ASSIGNMENT OF ERROR

The trial court abused its discretion by not allowing Dr's Davis and Hodgson to testify as experts in their respective fields of medical practice or under ER 702.

State v. Castellanos, 132. Wn. 2d. 94.97, 935. P2d. 1353 (91997)

[1] Evidence - Review - Discretion of Court - Abuse - What Constitutes. Evidentiary rulings are addressed to the trial court's discretion and will not be reversed absent an abuse of discretion. An abuse of discretion occurs only when no reasonable person would take the view adopted by the trial court.

Respondents assertion that Plaintiff is not qualified by education and experience is without merit as Toney is NOT (emphasis added) a licensed Chiropractor in Washington and is not bound by the restrictive licensure, but is free to use his entire education and knowledge gained in his 65 years which is far greater than any human health knowledge that counsel Lillegren or the court possess. Toney never sought to testify as a Chiropractor or treat the general public as a Chiropractor, but to testify upon knowledge and experience (ER702) gained in college, almost twenty years of active practice, post graduate studies and literary articles. Toney

does hold a certificate for basic sciences from the Medical University of Vermillion South Dakota.

The court further abused its discretion by ruling that Toney was not qualified to give expert opinion testimony regarding his injuries and causation, which is contrary to the laws of Washington. (VR 36 – 43)

Goodman v. Boeing Co. , 75 Wash. App. 60, 877 P2d. 62 (1991). Evidence – Opinion Evidence – Expert Testimony – Qualifications – Review – Standard of Review. A trial court's determination of an expert's qualifications to testify is reviewed under the manifest abuse of discretion standard. Medical Treatment – Nurses – Expert Testimony – Future Care Needs. An experienced registered nurse is competent to testify as to a patient's future need for care.

The court went on to say that:

Brannan , 104 Wash 2d. 55, 700 P2d. 1139 is misplaced.... The Brannan ruling is even less persuasive today in light of the legislative amendment of RCW 51. 32. 112 (2).

RCW 51.32.112

Medical examination — Standards and criteria — Special examinations by chiropractors — Compensation guidelines and reporting criteria. (2) Within the appropriate scope of practice, chiropractors licensed under chapter 18.25 RCW may conduct special medical examinations to determine permanent disabilities in consultation with physicians licensed under chapter 18.57 or 18.71 RCW. The department, in its discretion,

may request that a special medical examination be conducted by a single chiropractor if the department determines that the sole issues involved in the examination are within the scope of practice under chapter 18.25 RCW. However, nothing in this section authorizes the use as evidence before the board of a chiropractor's determination of the extent of a worker's permanent disability if the determination is not requested by the department.

Toney would be within the scope of practice of Chiropractic under RCW 18.25 to diagnose his condition and refer himself for medical treatment for both his heart and hearing loss conditions albeit his education is far in excess of the restrictive licensure of Washington, Because Toney is not restricted by RCW 18.25 Toney may use his entire education and knowledge to diagnose his injuries and take appropriate action in his best interests. The courts ruling that Toney is restricted by statute is incorrect and would be yet another abuse of discretion.

Dr Davis's testimony as a treating physician and retired U. S. Air Force flight surgeon would have been helpful to the jury without question, as very few Medical Doctors have any actual experience with warfare noise related injuries resulting in directly related clinical diagnosis's of both acute and latent manifestations of maladies and injuries that may trigger the onset of disease, all of which would be helpful to the jury in understanding the alleged injuries to Toney.

ER 702 “if scientific , or technical, or other specialized knowledge will assist the trier of fact to understand the evidence or to determine a fact in issue, a witness qualified as an expert by knowledge, skill, experience, training, or education, may testify thereon in the form of an opinion or otherwise.”

Dr Davis is fully capable to assist the trier of fact., The court in denying Dr. Davis’s testimony as an expert witness stated: “ Dr. Davis – Granted, I only read four pages of his deposition testimony – and just so the parties are aware, Dr. Davis, in 2002, I saw him once. He was a Kaiser doc, I saw him once for a general physical and I don’t think I saw him – maybe I saw him twice in 2002, but after that I didn’t – I switched (VR 92, 93) The court’s statements are prejudicial in nature and apparently influenced the courts decision to disqualify Dr. Davis, which is yet another instance of his abuse of discretion.

Dr. Hodgson like Dr. Davis has over 20 years of active practice and commonly treats hearing loss patients and is one of two Oregon head trauma specialists on call and cannot be out of the Portland area in case of an emergency. Dr. Hodgson did provide a preliminary report see attached exhibit (Kim the case manager told me not to reattach the exhibits from my first opening brief, stating she would attach them to the filed copy). For the court to disallow Dr. Hodgson to testify as an expert is beyond belief that Dr. Hodgson would have nothing that would assist the trier of

fact in their understanding of the injuries sustained by Toney , and is a demonstration of the courts prejudicial and biased ruling in this case. ER 702, Anderson, 172 Wn. 2d. 593.

VII. No. 5 Argument for bias and prejudice of the court

Respondents citation of State v. Cameron 47 Wn . App. 878, 884, 737 P 2d. 688 (1987) is misplaced as neither party filled a affidavit of prejudice against Judge Evans. Likewise the case cite of IN Re Marriage of Farr, 87 Wn. App. 177, 188, 940 P 2d. 697 (1997) is also a case seeking a Judge's recusal.

The bias and prejudice of Judge Evans relates to his personal beliefs concerning Dr's Davis and Hodgsons expertise as well as the laws of Washington State concerning the practice of Chiropractic, all of which have been set forth throughout this reply brief and all lead a fair minded man to the belief that Toney has not been afforded the Constitutionally required Due Process and a opportunity to present evidence to the trier of fact.

State v. Lively 130 Wash. 2d. 1. 921 P.2d 1035 [10]
Constitutional Law - Construction - State and Federal Provisions - Independent State Interpretation - Argument - Timeliness - First Raised in Reply Brief. Ordinarily, an appellate court will not consider a (State v. Gunwall, 106 Wn 2d., 54), analysis first presented in a reply brief.

106 Wn. 2d. 54, 720 P. 2d. 808 State v. Gunwall
Constitutional Law - Relationship of State and Federal
Constitutions - Independent State Interpretation. A court
determines whether the state constitution should be
interpreted as being more protective of individual rights
than the federal constitution by considering the following
nonexclusive factors: (1) the language of the state
constitution, (2) significant differences in the language of
parallel provisions of the federal and state constitutions, (3)
the history of the state constitution and common law, (4)
preexisting state law, (5) structural differences between the
federal and state constitutions, and (6) whether the subject
matter is of particular state interest or local concern.

VIII. CONCLUSION

For the above stated reasons the courts dismissal of the case should be
reversed, Toney's constitutional Rights and due process restored and the
matter remanded for trial on the merits.

This 18th. Day of August, 2014.

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COURT OF APPEALS, DIVISION II, FOR THE STATE OF WASHINGTON

John R. Toney, a proper person,
Plaintiff,

No. 45604-4-II

v.

Kevin T. Mitchell and Kimberly
S. Mitchell, Jointly and Severally,

Proof of Service

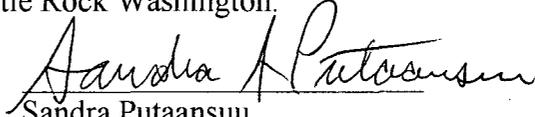
I Sandra Putaansuu, being of majority age and not a party to the action and competent to testify in the above named matter state as follows:

1. That I did place in the U.S. mail, two copies of Plaintiff's Reply Brief of postage prepaid addressed to the Court of Appeals Division II, 950 Broadway, suite 300, Tacoma Wa. 98402

2. One copy of Appellant's Reply Brief and a copy of the proof of service, addressed to Shawn Lillegren, 888 S.W. 5th. Ave. Suite 500, Portland Or. 97204 at Castle Rock Washington on ~~June~~ ^{Aug 18} 19, 2014. ^{SAP}

Declaration: I Sandra Putaansuu, certify/ declare under penalty of perjury under the laws of the state of Washington that the foregoing is true and correct.

Dated August 18, 2014, signed at Castle Rock Washington.

A handwritten signature in black ink, appearing to read "Sandra Putaansuu". The signature is written in a cursive style with a horizontal line underneath the name.

Sandra Putaansuu

9531 Barnes Dr.

Castle Rock Wa. 98611