

No. 47777-7 II

COURT OF APPEALS, DIVISION II

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MAUREEN MUGHAL,

RESPONDENT,

V.

COPIN SASTRAWIDJAYA AND  
RIANNE MATHEOS,

APPELLANTS

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APPEAL FROM THE SUPERIOR COURT OF  
COWLITZ COUNTY  
THE HONORABLE STEPHAN WARNING  
CAUSE NO. 14-2000361-87

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REPLY BRIEF OF APPELLANTS

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SCOTT B. PARKS, WSBA# 43359  
ATTORNEY FOR APPELLANTS  
VANCOUVER BC.

### Statement of Reply

With the exception of Respondent's argument that Appellants did not raise constitutional arguments below, reply arguments to the Response would be the same as those submitted in the Brief of Appellants and need no repeat.

The Constitutional arguments may be considered for three reasons. First, Appellants raised in their written response to the trial court below that the Court infringed on the rights of the Plaintiffs. Secondly, the parties have the right to raise for the first time on appeal "manifest error affecting a constitutional right." RAP 2.5(a). Thirdly, the court of appeals has the discretion to either reject or consider claims of error that were not raised below, and it does not commit error by doing either. see e.g., Bennett v. Hardy, 113 Wn.2d 912, 918-19, 784 P.2d 1258 (1990).

The constitutional arguments made by Appellants should be considered and those arguments warrants reversal, as do other arguments made in Appellant's Brief of Appellants.

Dated: October 14, 2016

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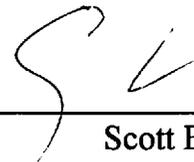
**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a copy of the foregoing has been furnished this 15<sup>rd</sup> day of October, 2016 by U. S. Mail to:

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\_\_\_\_\_  
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# PARKS LAWYER BARRISTER & SOLICITOR

**March 15, 2016 - 2:58 PM**

## Transmittal Letter

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Case Name: Mughal v. Satrawaidjaya

Court of Appeals Case Number: 47777-7

**Is this a Personal Restraint Petition?** Yes  No

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Personal Restraint Petition (PRP)

Response to Personal Restraint Petition

Reply to Response to Personal Restraint Petition

Petition for Review (PRV)

Other: \_\_\_\_\_

### Comments:

No Comments were entered.

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