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

PUGET SOUND ADVOCATES FOR RETIREMENT ACTION; M.G.;
T.S. ON BEHALF OF S.P.; E.S. ON BEHALF OF R.S.; and
SEIU 775, a labor organization,

Appellants,

v.

STATE OF WASHINGTON DEPARTMENT OF SOCIAL AND
HEALTH SERVICES; and SEATTLE TIMES COMPANY,

Respondents.

APPELLANTS' REPLY BRIEF

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I. INTRODUCTION

At issue is whether the Department of Social & Health Services (“DSHS”) should publicly disclose personal information protected by the Washington Constitution and statute. It should not.

First, Respondents do not dispute that public employees’ full names associated with their corresponding birthdates are constitutionally protected from public disclosure. Nor could they, as that is what this Court squarely held in *Washington Public Employees Association v. Freedom Foundation*, 1 Wn. App. 2d 225, 229, 404 P.3d 111 (2017) (“*WPEA*”). There is no question that the Public Records Act (“PRA”) request here seeks the full names and corresponding birthdates of public employees. And contrary to DSHS’s suggestion otherwise, whether that constitutional right is “personal” is of no relevance to whether constitutionally-protected information is subject to public disclosure. Under this Court’s holding in *WPEA*, the PRA request for Individual Provider names and birthdates here must yield to the constitution.

Second, Initiative 1501 (the “Act”) also prohibits disclosure. Respondents do not dispute that the Act contains a statement of a strong public policy of protecting vulnerable individuals that would be served by retroactive application to a post-election PRA request snuck in over a week after the people voted to approve the Act. Nor do they distinguish

the numerous cases where courts have applied a law retroactively based on intent, let alone analyze the Act itself. Instead, DSHS focuses on its duties under the PRA and reprises its observation that the Act omits explicit retroactivity language. This is of no help in analyzing the issues before the Court and ignores that the very reason courts conduct a retroactivity analysis is to determine whether laws apply before their effective dates despite lacking retroactivity language. Here, the Act's strong policy objective of protecting vulnerable individuals would be served by applying the law to the post-election PRA request. Further, DSHS fails to meaningfully address the Act's separate, affirmative prohibition on disclosure unconnected to PRA requests. As such, the Act also compels protecting the requested information from disclosure.

Appellants respectfully request that this Court reverse the trial court and permanently enjoin DSHS from fulfilling the post-election PRA request for Individual Provider names and corresponding birthdates.

II. ARGUMENT

A. The Washington Constitution Prohibits Disclosing Individual Provider Names and Corresponding Birthdates

The Supreme Court has declared that “the PRA must give way to constitutional mandates.” *Freedom Found. v. Gregoire*, 178 Wn.2d 686, 695, 178 Wn.2d 686 (2013). Here, the post-election PRA request must give way to Article I, Section 7, which “protects from public disclosure

state employees' full names associated with their corresponding birthdates." *WPEA*, 1 Wn. App.2d at 228.

Rejecting a PRA request for the same information requested here, this Court in *WPEA* observed that "[p]ublic disclosure of state employees' full names associated with their corresponding birthdates reveals personal and discrete details of the employees' lives." *Id.* at 234. This Court concluded that such information, when provided to the state for employment purposes, must remain private because disclosure to the public domain would subject these employees to an "ongoing risk of identity theft and other harms[.]" *Id.* (emphasis in original). *WPEA* is directly controlling authority and prohibits disclosing the requested records.

Respondents fail to meaningfully respond to the constitutional privacy concerns implicated by publicly disclosing names paired with birthdates.¹ In fact, DSHS agrees that *WPEA* held that "a state employee is entitled to an expectation of privacy in his or her full name [and] corresponding birthdate." DSHS's Response at 5. And Respondents do not dispute that the post-election PRA request here concerns the same information declared constitutionally protected in *WPEA*. As such, there

¹ The PRA requestor, the Seattle Times Company, did not participate in the trial court permanent injunction briefing or hearing, nor has it provided this Court with any briefing on appeal.

is no reason why the constitutional privacy right recognized in *WPEA* does not prohibit disclosure here.² Indeed, as this Court has also explained, Article I, Section 7 “guarantees the people of Washington the right of privacy above and beyond the . . . the PRA.” *DeLong v. Parmelee*, 157 Wn. App. 119, 156 n. 19, 236 P.3d 936 (2010).

Yet, while purporting to take “no position on the scope or applicability of Article I, Section 7 to this case,” *see* DSHS’s Response at 9, DSHS claims that it is “unable to assert an employee’s constitutional right in the employee’s stead” because such rights are “personal”, *see id.* (citation omitted). This argument is without merit. DSHS confuses the ability to assert constitutional violations on behalf of a third party with the State’s duty to refrain from infringing on citizens’ constitutional rights. The question here is not whether DSHS may bring claims for constitutional violations on behalf of Individual Providers. Rather, it is whether DSHS should be prohibited from violating public employees’

² Although *WPEA* was decided while this case was on appeal, the Washington Supreme Court has explained that the “default of retroactive application” of new civil case law “is overwhelmingly the norm.” *See Jackowski v. Borchelt*, 174 Wn.2d 720, 731, 278 P.3d 1100 (2012) (internal quotation marks omitted); *see also Lunsford v. Saberhagen Holdings, Inc.*, 166 Wn.2d 264, 271, 208 P.3d 1092 (2009) (“Historically, Washington has followed the general rule that a new decision of law applies retroactively unless expressly stated otherwise in the case announcing the new rule of law.”). Indeed, it is only “in rare instances” that courts “override the presumption of retroactive application and choose to give a decision prospective-only application.” *Shandola v. Henry*, 198 Wn.App. 889, 900, 396 P.2d 395 (2017) (citation omitted). Further, it would be particularly problematic to disregard *WPEA* here, where, the exact same information is at issue and the protection provided is of constitutional magnitude.

rights by disclosing their constitutionally-protected personal information. This question must be answered in the affirmative.

Once a constitutional right of privacy in certain types of information is recognized, there is no need for an individualized establishment of that right to prevent disclosure. *See, e.g., Gregoire*, 178 Wn.2d at 695 (citing decisions “recogniz[ing] that the constitution supersedes contrary statutory laws” and explaining a “PRA claim must fail” when constitutional principles apply). That is particularly true here, where, the privacy interest in full names associated with birthdates does not differ from one public employee to another. It is not within DSHS’s ability to voluntarily violate this constitutional protection. *See Seattle Times v. Serko*, 170 Wn.2d 581, 595, 243 P.3d 919 (2010) (noting that although “[t]here is no specific exemption under the PRA that mentions the protection of an individual’s constitutional” rights, “courts have an independent obligation to secure such rights”). Here, disclosing the requested information would violate the constitution, and therefore DSHS cannot do so—period.³

³ DSHS cites inapposite authority for its claim that it cannot withhold information responsive to a PRA request when “personal” constitutional rights are implicated. *See* DSHS’s Response at 9. The cases DSHS cites do not concern whether a statutory right to have information publicly disclosed should yield to the constitution. For example, *In Re Marriage of Akron* concerned a third party’s ability to assert a child’s best interest argument. 160 Wn. App. 48, 49, 248 P.3d 94 (2011). Similarly, *Rakas v.*

An Article I, Section 7 privacy right recognized in another context illustrates the point. In *State v. Hinton*, 179 Wn.2d 862, 877-78, 319 P.3d 9 (2014), the Washington Supreme Court held that citizens have a constitutional privacy right in their cell phones and therefore a warrantless cell phone search would violate Article I, Section 7. It would be absurd for the government to argue that it could proceed to conduct a warrantless search of a cell phone unless the cell phone owner obtains judicial relief in advance. But that is essentially what DSHS suggests is allowed here for disclosure of public employee names and associated birthdates. Claiming that Article I, Section 7 rights are “personal”, DSHS contends it cannot withhold the requested information absent judicial relief. This conclusion is both incorrect and nonsensical. The government cannot disregard the constitution, even in the public records context. *See Ameriquest Mortg. Co. v. Wash. State Office of the Attorney General*, 170 Wn.2d 418, 439-40, 241 P.3d 1245 (2010) (explaining constitutional preemption of PRA analysis is not required because the PRA’s “other statute” exemption accommodates the constitution).

Illinois concerned a third party’s (a police officer’s) ability to assert a defendant’s *Miranda* rights. 439 U.S. 128 (1978). Unlike those cases, at issue is not whether DSHS can assert another party’s constitutional rights, but whether an applicable law prohibits DSHS from fulfilling the PRA request.

In sum, the constitution is the fundamental law of our state and it forbids disclosure of public employees' full names combined with dates of birth. DSHS must follow this rule.

B. The Act Applies Retroactively and Respondents Fail To Rebut Appellants' Retroactivity Analysis

Washingtonians passed the Act to protect sensitive personal information, including the names and birthdates of Individual Providers, from public disclosure. Language throughout the Act makes clear the importance of this public policy, and the importance of imposing express limitations on disclosure. It is that important public policy that provides the basis for Appellants' retroactivity argument.

Respondents fail to meaningfully rebut Appellants' retroactivity analysis, wholly ignoring the cited language from the 2016 Voters' Pamphlet, which shows that voters were informed that the Act's passage would block the disclosure of sensitive personal information, including Individual Provider names and birthdates, "if approved." *See* Appellants' Br. at 16-17. Instead, DSHS reprises its unremarkable observation that the Act lacks "an explicit statement of retroactivity" and that the Act "[c]annot be [a]ppplied" to the post-election PRA request because the Act was "[n]ot in [e]ffect [w]hen the [PRA request] was [s]ubmitted." DSHS's Response at 9, 16. This entirely misses the point of Appellants'

argument and of a retroactivity analysis in general. Courts routinely apply laws retroactively even when not expressly required by the statute's plain language. *See, e.g., City of Ferndale v. Friberg*, 107 Wn.2d 602, 606, 732 P.2d 143 (1987) (holding statute's strongly stated public purpose for tax exemption to protect agricultural land demonstrated intent to apply the exemption retroactively, notwithstanding lack of retroactivity language in statute); *State v. Rose*, 191 Wn. App. 858, 869, 365 P.3d 756 (2015) (holding that initiative's stated policy "to stop treating adult marijuana use as a crime" demonstrated intent to apply law retroactively). Indeed, the only time courts engage in a retroactivity analysis is to determine whether retroactivity applies despite the lack of an express statement of retroactivity in the law.

DSHS makes no attempt to distinguish cases finding legislative intent to apply a law retroactively, and simply ignores Appellants' case law analysis. *See* Appellants' Br. at 16 (citing numerous cases where courts applied a law retroactively based on intent); DSHS's Response at 17. As the Washington Supreme Court has explained, the requirement for applying a law retroactively based on intent turns in part on whether the underlying policy would be furthered by retroactively applying the law. *See, e.g., Ferndale*, 107 Wn.2d at 605. That is, contrary to DSHS's

assertion otherwise, the existence of the strong public policy that would be served by applying the law retroactively is sufficient to find intent. *See id.*

The Supreme Court's decision in *Godfrey v. State*, 84 Wn.2d 959, 961-62, 530 P.2d 630 (1975), is instructive. There, at issue was a law eliminating contributory negligence as an affirmative defense, and, like here, the law did not contain an express statement of retroactivity. *Id.* at 922. Reversing the "pretrial order" denying injunctive relief, *id.* at 961, the Supreme Court rejected the presumption that statutes "operate prospectively" and instead concluded that the law applied retroactively because the "the State of Washington ... [c]hanged its public policy" to express "[d]issatisfaction with the oversimplistic harsh concept" of contributory negligence as "a complete bar to recovery," *id.* at 966-97. Accordingly, the Court applied the law eliminating contributory negligence as an affirmative defense retroactively, i.e., "prior to its effective date[.]" *Id.* at 968.

Similarly, here, Washingtonians voted to change the state's public policy regarding the treatment of sensitive personal information. Respondents do not argue otherwise. Nor could they. The Act references its policy of protecting vulnerable populations six times. *See* Appellants' Br. at 14. The Act's underlying purpose of protecting vulnerable adults from identity theft and fraud would be furthered by putting a hard stop to

disclosing sensitive personal information in response to a post-election PRA request. *See* Appellants' Br. at 12-20. This underlying purpose, along with the Act's emphatic and repeated language expressing the intent to prevent the release of this information, as well as the information provided to voters at the time of passage in the 2016 Voters' Pamphlet,⁴ all support retroactive application of the Act to a post-election PRA request.

C. DSHS's Reliance on the PRA's Rules of Construction Fails

Rather than rebutting Appellants' retroactivity analysis, DSHS recites its duties under the PRA, and points to the well-versed notion that the PRA should be construed in favor of disclosure. *See* DSHS's Response at 7-8. This maxim does not meaningfully address the question before the Court. The issue before this Court is whether a PRA exemption prohibits DSHS from publicly disclosing the requested information. Here, there are three: Article I, Section 7 of the Washington Constitution; the Act's PRA exemption; and the Act's statutory prohibition. *See* Appellants' Br. at 12-20.

⁴*See* State of Washington Voters' Pamphlet, 2016 General Election, available at: <https://weiapplets.sos.wa.gov/MyVoteOLVR/onlinevotersguide/Measures?language=en&electionId=63&countyCode=xx&ismyVote=False&electionTitle=2016%20General%20Election%20#ososTop> (last accessed March. 5, 2018) (Arguments for Initiative Measure No. 1501) ("It prevents the government from releasing information that could help identity thieves targeting seniors and the vulnerable.") (emphasis added).

The PRA's governing rules of construction cannot trump the Act's plain language, which prohibits disclosing Individual Provider names and birthdates, *see* RCW 43.17.410, and exempts the same from the PRA, *see* RCW 42.56.540(1). And narrowly construing the Act does not alter its plain language prohibiting disclosure. *See Planned Parenthood of Great NW. v. Bloedow*, 187 Wn. App. 606, 625, 350 P.3d 660 (2015) (acknowledging PRA's mandate for broad disclosure but concluding that the clear and unambiguous terms of an "other statute" prohibited disclosure); *Anderson v. DSHS*, 196 Wn. App. 674, 684, 384 P.3d 651 (2016) (finding other statute declaring information about certain individuals "shall be private and confidential" exempted such information from disclosure despite the PRA's mandate of liberal construction in favor of disclosure). Likewise, DSHS cannot credibly contend that the PRA trumps the constitution. *See, e.g., Gregoire*, 178 Wn.2d at 695 (explaining that "the PRA must give way to constitutional mandates").

Moreover, while the PRA requires liberal construction, so too does the Act. The Act's plain language expressly requires that it be "liberally construed" to protect vulnerable individuals. *See* Appellants' Br. at 15. This intent must be given effect, which requires the very information the Act declares private to not be publicly disclosed. Prohibiting disclosure of the sensitive information requested here is particularly warranted because

the PRA’s “primary purpose” of “ensur[ing] government accountability,” is not at stake in releasing the sensitive, private information of public employees. *See Benton City. v. Zink*, 191 Wn. App. 269, 280, 361 P.3d 801 (2015). Indeed, release of such information may lead to identity theft or fraud, “nefarious goals” that public disclosure does not support. *See Roe v. Anderson*, 3:14-CV-05810 RBL, 2015 WL 4724739, at *2-3 (W.D. Wash. Aug. 10, 2015) (permanently enjoining county assessor from fulfilling PRA request for erotic dancer license applications, the disclosure of which would have an “unconstitutional chilling effect” because dancers are “uniquely vulnerable to harassment, shaming, stalking, or worse”).

In sum, “[t]he PRA, by design, cannot violate the Constitution.” *Id.* at *3. Nor can the PRA overcome the Act’s statutory prohibition against disclosing Individual Provider names and birthdates and exemption of the same from public disclosure.

D. Respondents Fail To Rebut the Act’s Statutory Prohibition

In addition to creating a PRA exemption for sensitive personal information, the Act also statutorily prohibits DSHS from disclosing Individual Provider names and birthdates. *See Appellants’ Br.* at 26-27. Specifically, the Act states that “neither the state nor any of its agencies shall release sensitive personal information of vulnerable individuals or sensitive personal information of in-home caregivers for vulnerable

populations.” RCW 43.17.410. By statute, in-home caregivers include Individual Providers. RCW 42.56.640(2)(a).

RCW 43.17.410 is a standalone prohibition untethered to the PRA. As a result, the Act’s statutory prohibition applies here and now: the state shall not release Individual Providers names at any time regardless of whether—or when—a PRA request was filed. Thus, contrary to DSHS’s suggestion, retroactivity is simply unnecessary under RCW 43.17.410.

Accordingly, the Act’s statutory prohibition presently forbids DSHS from fulfilling the post-election PRA request. This Court should reverse.

E. Appellants Have Satisfied All Injunctive Relief Factors

Appellants have satisfied the requirements for permanently enjoining DSHS from disclosing Individual Provider names and birthdates.

In response to Appellants’ motion for a permanent injunction, Respondents did not contest that the requested records pertains to Appellants. CP at 194. Nor did Respondents contest that disclosure would not be in the public interest and would substantially and irreparably harm Appellants. *Id.* Respondents also do not contest these factors on appeal. As a result, the only issue before this Court is whether an exemption prohibits disclosure. *See State v. Powell*, 166 Wn.2d 73, 82,

206 P.3d 321 (2009) (explaining argument not raised at trial is waived on appeal). For reasons already stated, an injunction is warranted because three exemptions prohibit disclosure. *See* Appellants' Br. at 12-20.

Regardless, even if the remaining injunctive relief factors were before this Court, DSHS should still be permanently enjoined from fulfilling the post-election PRA request. First, it is undisputed that the requested records specifically pertain to Appellants, as the records consist of Individual Providers' names and corresponding birthdates. Second, as this Court explained in *WPEA*, "public disclosure of birthdates of individually identified state employees is not in the public interest . . . because they do not inform the public of facts related to a government function." 1 Wn.App.2d at 237. Moreover, this Court determined that disclosing this information would cause substantial and irreparable harm because "public disclosure of state employees' personal information, which will make the information available to anyone, invades their constitutionally protected expectation of privacy, and exposes them to an ongoing risk of identity theft and other potential personal harms." *Id.* (emphasis in original).

Accordingly, the requirements for obtaining an injunction under the PRA have been satisfied. As such, the trial court erred by denying Appellants' motion for a permanent injunction.

III. CONCLUSION

As this Court recognized in *WPEA*, public employees' full names associated with their corresponding birthdates are constitutionally protected under Article I, Section 7. The Act also prohibits disclosure. Aimed at protecting seniors and vulnerable individuals from identity theft and fraud, the Act prohibits DSHS from disclosing Individual Provider names and birthdates and exempts the same from the PRA. Because the Act must be given retroactive effect in order to effectuate its policy objective, the trial court erred by failing to permanently enjoin DSHS from the fulfilling the post-election PRA request for Individual Provider names and birthdates. Appellants respectfully ask this Court to reverse.

RESPECTFULLY SUBMITTED this 5th day of March, 2018.

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PROOF OF SERVICE

I am and at all times hereinafter mentioned was a citizen of the United States, a resident of the State of Washington, over the age of 21 years, and not a party to this action. On the 5th day of March, 2018, I caused to be served, via the Washington State Appellate Court's Portal System, a true copy of the foregoing document upon the parties listed below:

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DATED this 5th day of March, 2018.



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