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No. 50809-5-II

COURT OF APPEALS, DIVISION TWO
OF THE STATE OF WASHINGTON

In re the Parenting and Support of T.W.:

Lucas Wagoner, Appellant.

v.

Alexandria Russum, Respondent.

BRIEF OF APPELLANT

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ASSIGNMENTS OF ERROR

Assignment of Error No. 1 - The trial court erred in denying Mr. Wagoner’s Motion to continue trial at the June 16, 2017 Trial Readiness Hearing.

Assignment of Error No. 3 – The trial court erred in entering the August 11, 2017 “Child Support Order” which ordered that a Money Judgment be entered against Mr. Wagoner for \$15,000.00 in attorney fees to Ms. Russum.

ISSUES

1. Did the trial court abuse its discretion when it denied Mr. Wagoner’s request for a new trial therefore preventing Mr. Wagoner from having a fair trial? (Assignment of Error No. 1)
(Assignment of Error No. 2)
2. Can the trial court order a money judgment for attorney fees without fulfilling the requirements of the lodestar method?
(Assignment of Error No. 3)

Statement of the Case

1. History of the relationship and initiation of the case

Mr. Wagoner and Ms. Russum resided together for approximately six years prior to the commencement of this action. (Clerk's Papers (hereinafter referred to as CP) Sub No. 2, p.1, ll. 21-22). The parties' daughter was born on April 22, 2011. (*Id* at ll. 22-23). Prior to the parties' separation Mr. Wagoner was a very involved father. (*Id* at l. 24). In the year prior to the parties' separating Mr. Wagoner was the parent who primarily provided care for the minor child. (*Id* at p. 2, ll. 7-8). During that time, Ms. Russum was pursuing her career as a dog trainer resulting in Mr. Wagoner spending all of his free time with the minor child. (*Id* at ll. 1-10).

Upon Mr. Wagoner moving out of the family residence, Ms. Russum began withholding the minor child from Mr. Wagoner. (*Id* at l. 22). Ms. Russum would tell Mr. Wagoner that he could see the minor child only to fail to follow through with these promises. (*Id* at p. 3, ll. 7-8). This resulted in Mr. Wagoner only seeing his daughter approximately five times between April 2015 and the filing of this action. (*Id* at l. 6).

On Friday, July 24, 2015, Mr. Wagoner filed a Petition for a Residential Schedule and Child Support in a parentage action in Clark County Superior Court wherein he stated that it was in the child's best interest for the court to order the parenting plan proposed by him. (CP Sub No. 3). This proposed parenting plan alleged that Ms. Russum had

withheld the child from Mr. Wagoner and asked that he be designated the Custodian of the minor child and that the minor child reside with him primarily and with Ms. Russum every other weekend. (CP Sub No. 9).

2. Interim Orders and proceedings

On September 2, 2015, the parties' competing Motions for Temporary Orders were heard by the Honorable Commissioner Snider. It was ordered that Mr. Wagoner was to have alternating weekend visitation with the minor child and that this visitation was to be supervised by the paternal grandparents. (CP Sub No. 40). It was further ordered that Mr. Wagoner was to take a hair and nail follicle drug test and that the parties were to spilt the cost of this drug test. (*Id.*). The court denied the request to appoint a Guardian Ad Litem due to both parties lacking the funds to pay for a Guardian Ad Litem. (CP Sub No. 39).

On October 16, 2015, Ms. Russum filed a Motion for Revision alleging that the Commissioner erred in allowing the Paternal Grandparents to provide supervision of Mr. Wagoner's visitation, in allowing alternating weekend visitation, in deleting restrictions concerning telephone contact, in ordering Ms. Russum to sign a release allowing Mr. Wagoner access to day care records, in allowing Mr. Wagoner to bring the matter before the court for review of his residential time, in disallowing Ms. Russum's proposed restrictions and/or restraints concerning contact, in not requiring Mr. Wagoner to attend drug treatment as a condition precedent to any visitation being allowed, and in adopting Mr. Wagoner's

child support worksheets. (CP Sub No. 63). The Motion for Revision was heard by the Honorable Bernard Veljacic on October 29, 2015. The court denied all requests of Ms. Russum except the request for Mr. Wagoner to attend drug treatment wherein the court revised the Commissioner's order and required that Mr. Wagoner obtain a drug and alcohol evaluation and comply with the recommendations. (CP Sub No. 70A).

On November 24, 2015, Mr. Wagoner filed a Motion for Review of Holiday Visitation. (CP Sub No. 79). On December 17, 2015, the court heard Mr. Wagoner's Motion and denied Mr. Wagoner's request to discontinue UAs, granted Mr. Wagoner holiday time with the minor child for Christmas, denied Mr. Wagoner's request to expand his visitation, denied Mr. Wagoner's request for unsupervised visitation, and awarded Ms. Russum \$350.00 in attorney fees. (CP Sub No. 91).

On January 7, 2016, Mr. Wagoner filed a Motion for Revision wherein Mr. Wagoner alleged that the Commissioner erred in denying his request to discontinue the requirement of random UAs, in denying his request to expand his visitation, in denying his request for unsupervised visitation, and in awarding Ms. Russum attorney fees. (CP Sub No. 95). On February 26, 2016, the Honorable Bernard Veljacic summarily denied Mr. Wagoner's Motion for Revision due to Mr. Wagoner failing to comply with LCR 53.2 by supplying only the pleadings of one party on the Motion for Revision. (CP Sub No. 106).

On April 15, 2016, Ms. Russum was granted an Ex-Parte Restraining Order which, among standard restraints, restricted the Mr. Wagoner from having visitation with the minor child pending a Guardian Ad Litem report and terminated Mr. Wagoner's rights to have telephone calls with his child. (CP Sub No. 115). Ms. Russum's Motion for Restraining Order was heard on April 29, 2016. At that hearing the court granted the Restraining Order, however; the court declined to stop visitation. (CP Sub No. 128)

On May 11, 2016, an Order Appointing Guardian Ad Litem on Behalf of Minor was entered, wherein; Shelly Krebs was appointed Guardian Ad Litem. (CP Sub No. 137). On October 28, 2016 Ms. Russum filed another Motion for Immediate Restraining Order based off of the Guardian Ad Litem's report. (CP Sub No. 179). That motion was denied (CP Sub No. 180). On November 3, 2016, Ms. Russum filed yet another Motion for Amended Temporary Family Law Order and Restraining Order. (CP Sub No. 185). The court heard Ms. Russum's Motion for Amended Temporary Family Law Order and Restraining Order on November 18, 2016. At that hearing, the Honorable Judge Suzan Clark adopted the Guardian Ad Litem's recommendations in total. (CP Sub No. 196). Thus, Mr. Wagoner's visitation was reduced to twice monthly for four hours at Innovative Services NW at his expense. (*Id.*)

On April 20, 2017 Mr. Wagoner was ordered to go to court for a Contempt Hearing based off of Ms. Russum's allegations that Mr.

Wagoner had violated the parenting plan by having unsupervised contact with the minor child, that he had failed to sustain a clean and sober lifestyle, and that he had failed to take UAs and failed to provide test results. (CP Sub No. 212). On May 12, 2017, the court signed Ms. Russum's Temporary Restraining Order and Contempt Hearing Order which terminated Mr. Wagoner's visitation for a minimum of two months and left the decision of whether Mr. Wagoner's visitation would resume to the recommendations of the Guardian Ad Litem. (CP Sub Nos. 225, 226).

3. Trial related Orders and proceedings

On February 16, 2016, Mr. Wagoner filed a Notice to Set for Trial. (CP Sub No. 102). On April 1, 2016, the case was set for a three day trial to commence on January 2, 2017. (CP Sub No. 111). On December 2, 2016, the court heard argument regarding whether the case was ready for trial. (CP Sub No. 200). At that hearing, trial was stricken because the original trial date was a court holiday. (*Id.*). On December 9, 2016, a new trial date of July 24 and 25, 2017 was set with a Trial Readiness Hearing set for June 16, 2017. (CP Sub No. 206).

On June 8, 2017, Mr. Wagoner's attorney filed a Notice of Intent to Withdraw as Attorney of Record, wherein Mr. Wagoner's attorney gave notice of her intent to withdraw as attorney of record for Mr. Wagoner as of June 15, 2017. (CP Sub No. 228). On June 16, 2017, one day after Mr. Wagoner's attorney's Notice of Intent to Withdraw as Attorney of Record became effective, a Trial Readiness Hearing was held before the

Honorable Suzan Clark. Counsel for Ms. Russum indicated his client was ready to proceed to trial. (CP Sub No. 229). The court urged Mr. Wagoner to sign any release and cooperate with Ms. Krebs in order to expedite the matter for Trial. (*Id.*). Mr. Wagoner moved for a continuance of the trial date to afford him an opportunity to hire new counsel. (*Id.*). The court denied Mr. Wagoner's motion for a continuance and the matter was called ready to proceed. (*Id.*).

On July 24, 2017, trial proceeded and the court reached its decision. At the outset of the trial Mr. Wagoner reiterated his inability to proceed adequately in this matter (Verbatim Report of Proceedings (hereinafter VRP) p. 3, ll. 20-21., p.5 ll. 20-21). Specifically, Mr. Wagoner informed the court that he did not know how "...this Court stuff works..." and that "...I'm not an attorney so I don't know how all this stuff works." (*Id.*). The trial that was originally scheduled for three days lasted a total of three hours and forty-eight minutes exclusive of recesses. (CP Sub No. 233). Mr. Wagoner's case in chief lasted only 1 hour. (*Id.*). Mr. Wagoner cross-examined Ms. Krebs for only one minute and Ms. Russum for only three minutes (*Id.*). Ultimately, the court found in favor of Ms. Russum and adopted her proposed Final Parenting Plan in total. (*Id.*).

Argument

i. Standard of Review

Both a trial court's decision to grant or deny a continuance and its determination of the amount of an attorney fee award are reviewed for an

abuse of discretion. *Harris v. Drake*, 116 Wn.App. 261, 287, 65 P.3d 350, (Div. 2 2003); *Sanders v. State*, 169, Wn.2d 827, 866-67, 240 P.3d 120 (2010). A trial court abuses its discretion in one of three ways, "...if its decision is manifestly unreasonable or based on untenable grounds or untenable reasons". *In re Marriage of Littlefield*, 133 Wn.2d 39, 46-47, 940 P.2d 1362, 1366 (1997). First, "...a court's decision is manifestly unreasonable if it is outside the range of acceptable choices, given the facts and the applicable legal standard". *Id* at 47. Second, a court's decision is based on untenable grounds if, "...the factual findings are unsupported by the record". *Id*. Third, a court's decision is based on untenable reasons "...if it is based on an incorrect standard or the facts do not meet the requirements of the correct standard". *Id*.

- 1. The trial court erred in denying Mr. Wagoner's Motion for Continuance to hire new counsel at the Trial Readiness hearing on June 16, 2017 as the denial of Mr. Wagoner's Motion for Continuance was outside the range of acceptable choices given the facts of this particular case and that this was Mr. Wagoner's first request for a continuance and in light of the facts of this case the denial did not operate in furtherance of justice but rather defeated justice.**

The Washington State Supreme Court has laid out the general rule on continuances and whether a denial of a Motion for Continuance is an abuse of discretion, saying that it "...depends on the facts of the particular case, the chief test being whether the grant or denial of the motion operates in the furtherance of justice. ... a continuance should be granted if a denial thereof would operate to delay or defeat justice; and courts have been said to be liberal in continuing a cause when to do otherwise would

deny applicant his day in court.” *Chamberlin v. Chamberlin*, 44 Wn.2d 689, 703, 270 P.2d 464, (1954). Furthermore, our Supreme Court has stated that “*Especially in divorce cases* a liberal view toward granting continuances is taken by most courts, and this is particularly so where the continuance is the first one sought.” *Id.*, (Italics added). Finally, “[D]ue process requires, at a minimum, that absent a countervailing state interest of overriding significance, persons forced to settle their claims of right and duty through the judicial process must be given a meaningful opportunity to be heard.” *In re Marriage of Giordano*, 57 Wn.App. 74, 77, 787 P.2d 51, (Div. 1 1990). Thus, continuances, especially the first one requested, should be liberally granted if to deny the request is not in the furtherance of justice and instead would defeat justice. Justice is defeated if a party is denied due process which is a meaningful opportunity to be heard.

In the case at hand, Mr. Wagoner’s attorney filed a Notice of Intent to Withdraw that became effective the day before Mr. Wagoner’s case was to be heard for readiness to proceed to trial and a mere 39 days before the case was to proceed to trial. (CP Sub No. 228). Mr. Wagoner’s attorney had been his attorney since he filed the case on June 24, 2015. (CP Sub No. 3). Mr. Wagoner requested that the court grant a continuance to allow him time to find an attorney. (CP Sub No. 229). Mr. Wagoner’s request for continuance was not opposed by Ms. Russum. (*Id.*). The court denied Mr. Wagoner’s motion for a continuance and called the case ready to proceed to trial. (*Id.*). The court gave no reasoning for its denial of Mr.

Wagoner's request for a continuance, let alone a reason that would rise to the level of overriding significance. (*Id.*). This was the first time that Mr. Wagoner had requested a continuance. The case had been continued once before due to the court's error in setting the case for trial on a court holiday. (CP Sub No. 200). The denial of Mr. Wagoner's Motion for Continuance forced him to proceed to trial unrepresented with little time to prepare of trial, while Ms. Russum retained representation of a seasoned family law attorney. The denial of his Motion for Continuance deprived Mr. Wagoner of a meaningful opportunity to be heard.

The trial in this matter was originally scheduled for three days. (CP Sub No. 111). When the case was reset due to the court setting the trial on a court holiday it was set for two days. (CP Sub No. 206). In total, the actual trial lasted three hours and forty-eight minutes exclusive of recesses. (CP Sub No. 233). During that three hours and forty-eight minutes Mr. Wagoner's case in chief lasted only an hour. (*Id.*). Mr. Wagoner lodged only four objections during Ms. Russum's case in chief, none of which were sustained. (VRP p.66, ll.21-211, P.99, l. 2, P.125, l.14, P.151, l. 19). This is despite numerous objectionable questions by opposing counsel. (See, e.g., VRP p. 15 l. 9, p. 165 ll. 10-11, p.174, ll. 11-12). Mr. Wagoner cross-examined Ms. Krebs for only one minute and Ms. Russum for only three minutes. (CP Sub No. 233). The aforementioned is illustrative of Mr. Wagoner's disadvantage in conducting a trial without counsel when faced with a seasoned family law

attorney as an opponent. It is important to note that Mr. Wagoner has no legal training.

Mr. Wagoner's statements at trial are also illustrative that he suffered deprivation of a meaningful opportunity to be heard. At the very outset of the case Mr. Wagoner informed the Court and opposing counsel that he did not know how "...this Court stuff works..." (VRP p.3, ll. 21, p.5, ll. 19-21, p.47 ll. 10-12). Furthermore, Mr. Wagoner told the Court that he was not ready to proceed. (Cite VRP p.7, ll. 7-10). It is apparent from the verbatim report of proceedings that Mr. Wagoner was at a significant and unnecessary disadvantage given that he had requested a continuance to retain new counsel. (E.g., Cite i.e. p.90 l. 21-p.90 l. 9).

Proceeding with trial in this fashion in light of Petitioner's timely request for a continuance was manifestly unjust. The denial of Mr. Wagoner's Motion for Continuance was outside the range of acceptable choices given the facts particular to his case and the applicable legal standard. This case was a highly contentious and complex case involving multiple potential witnesses, a Guardian Ad Litem, and far serious ramifications. Respondent was represented by a seasoned attorney and Petitioner's attorney withdrew effective the day prior to the Readiness hearing and only 39 days prior to trial.

Denying Mr. Wagoner's request for a continuance did not operate in the furtherance of justice but instead defeated justice in this case. As stated before, this was Petitioner's first request for a continuance. The

Court gave no reasoning for its denial of Mr. Wagoner's request. This request was not opposed by Ms. Russum. The case had been litigated for exactly two years and during the vast majority of those two years Mr. Wagoner had been represented. During that two year timeframe numerous motions were filed and a Guardian ad Litem was utilized. In light of these facts and with no reasoning given by the Court it cannot be said that the denial operated in the furtherance of justice. This is especially true given that in divorce cases a liberal view is to be taken toward granting continuances. Denying Petitioner's request for a continuance denied Petitioner his right to due process because it denied him a meaningful opportunity to be heard. This is supported by the numerous statements of Mr. Wagoner that he did not know how things worked, the lack of objections by Mr. Wagoner despite significant objectionable material, and the Court's decision in this case which granted every request of Respondent without qualification. Given the nature of this case, it was an abuse of discretion for the court to deny Petitioner's request for a continuance. Due to the Court's abuse of discretion in denying Mr. Wagoner's Motion for Continuance the case should be remanded to allow Mr. Wagoner to retain counsel for a new trial.

2. **The trial court erred in ordering that Mr. Wagoner pay \$15,000.00 in attorney fees as the court did not exercise its discretion on articulable grounds.**

Under Revised Code of Washington 26.09.140 a trial court can award a reasonable amount of attorney fees. When an appellate court is

tasked with determining whether a Court's award of attorney fees was reasonable or whether the court abused its discretion in awarding attorney fees the appellate court is guided by the trial court's use of the lodestar method. *Mahler v. Szucs*, 135 Wn.2d 398, 433, 957 P.2d 632, (1998). "The lodestar methodology affords trial courts a clear and simple formula for deciding the reasonableness of attorney fees in civil cases and gives appellate courts a clear record upon which to decide if a fee decision was appropriately made." *Id* at 433-434. The burden of proof in the lodestar method lies with the party seeking an award of attorney fees. *Id* at 434.

The lodestar formula tasks the trial court with first determining that counsel for the party seeking fees expended "...a reasonable number of hours in securing a successful recovery..." which requires the trial court to exclude "...wasteful or duplicative hours..." *Id*. It is a requirement that the attorney arguing in favor of an award of fees provide documentation of the hours that were worked so that the court can make an informed decision regarding the award. *Id*. Beyond the examination of hours under the lodestar method the Court must also determine if the hourly rate charged was a reasonable rate at the time that the work was performed. *Id*. The final step is for the Court to multiply the hours that the Court determined were reasonably expended times the reasonable hourly rate. *Id*.

Trial courts must rigorously adhere to the lodestar method. *Id*. This means that the Court must "... Take an active role in assessing the reasonableness of fee awards, rather than treating cost decisions as a

litigation afterthought. *Id.* In short the Court must create a record to support the award of fees. *Id.* at 435. When the trial court fails to create this record the proper remedy is to remand the case to enable the trial court to develop this record. *Id.*

In the case at hand the trial court awarded Ms. Russum \$15,000.00 in attorney fees. (VRP p. 197, l. 1). The trial court seemingly pulled this figure out of thin air. (*Id.* at p.196 l. 12 – p. 197 l.1). It was the burden of counsel for Ms. Russum to prove that his fees were reasonable. At no point prior to or after trial did counsel for Ms. Russum file an affidavit or memorandum of fees. At no point during his closing argument related to Ms. Russum’s request for an award of attorney fees did counsel for Ms. Russum lay out the framework to enable the court to utilize the lodestar method to arrive at a reasonable fee award. (VRP p. 190 l. 24 – p. 192 l. 12). No record exists as to whether the amount of work performed by counsel for Ms. Russum in reaching the alleged more than \$33,000.00 in fees was reasonable or whether it involved duplicative work or as to whether the hourly rate of counsel for Ms. Russum was reasonable

The lodestar method was not rigorously adhered to in this case. The Court treated this award of Attorney fees as an afterthought dedicating a mere seven words “...and you’ll pay \$15,000.00 in attorney’s fees” to the issue. (VRP p. 197, l. 1). Counsel for Ms. Russum did not meet his burden and no record exists to determine if the trial court’s award of \$15,000.00 in fees against Mr. Wagoner was appropriate. Due to the

abuse of discretion in relation to attorney's fees in this case a remand to the trial court to develop a record is required.

CONCLUSION

Mr. Wagoner asks this court to remand this case for a new trial in order to allow him to retain counsel consistent with his request to do so at the Trial Readiness Hearing. The trial court abused its discretion denying Mr. Wagoner's request as this was the first time Mr. Wagoner had made such a request, his attorney for the previous two years had withdrawn from his case effective the day prior to his request, it was an unopposed motion, and requiring him to proceed to trial without time to obtain new legal counsel did not operate in the furtherance of justice. Mr. Wagoner asks this court to remand this case in regards to the award of attorney fees. The trial court treated attorney fees like an afterthought in this case. Counsel for Ms. Russum provided no information for the court to conduct the lodestar method in determining an award of attorney fees. Therefore, the trial court abused its discretion in ordering that Mr. Wagoner have a judgment entered against him for \$15,000.00 in attorney fees.

March 16, 2018

Respectfully submitted,



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Attorney for Appellant

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