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**COURT OF APPEALS, DIVISION II
STATE OF WASHINGTON**

STATE OF WASHINGTON, RESPONDENT

v.

CARLOS HULL, APPELLANT

Appeal from the Superior Court of Pierce County
The Honorable Frank E. Cuthbertson

No. 16-1-03254-2

Brief of Respondent

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A. ISSUES PERTAINING TO APPELLANT'S ASSIGNMENTS OF ERROR.

1. Did the trial court properly exercise its discretion in instructing the jury on WPIC 6.52 regarding eyewitness identification when there were multiple eyewitnesses who were able to identify the shooter?

(Appellant's Assignment of Error No. 1).

B. STATEMENT OF THE CASE.

1. PROCEDURE

Carlos Hull, hereinafter "defendant," was charged by Second Amended Information with two counts of assault in the first degree, one count of assault in the second degree, and one count of unlawful possession of a firearm in the first degree. CP 107-109.

As part of its proposed jury instructions, the State proposed WPIC 6.52. CP 171-206; 207-216. The comment to WPIC 6.52 states, in part:

This instruction is intended for use solely in criminal prosecutions in which the jury has heard eyewitness identification testimony. The court may use this instruction as appropriate when evidence has been presented concerning an identification made by an eyewitness either at trial or pretrial, whether or not expert testimony on the subject was presented.

Defense objected to the court giving WPIC 6.52, stating, "I would object only to the degree that I believe the instructions already address this

particular issue. And I think this brings a little bit more light than is necessary as to ability to perceive and all of that, so that would be my argument.” 6RP¹ 527-528. At no time did defense object that the instruction did not allow him to argue his theory of the case, was burden shifting, or would otherwise hinder his ability to proceed with his defense. The defendant did not argue that it was an improper comment on the evidence. The court overruled the objection, finding that it was appropriate in this case. 6RP 528; CP 77-106 (Inst. #4).

The jury convicted defendant as charged. CP 110-115; 7RP 626-629. He was sentenced to an exceptional downward sentence of 365 months. CP 140-154; 8RP 661-663.

2. FACTS²

On the evening of August 22, 2015, into the early morning hours of August 23, Brandon Walker and his friends, Shane Giannini and Randy Stone, were celebrating Walker’s upcoming nuptials. Instead of a night ending in celebration and revelry, the night ended with each member of the group sustaining serious injuries.

¹ The verbatim reports of proceedings are contained in eight volumes with consecutive pagination.

² It appears from the record below that Chambers, Berry, and the defendant are African-American. 7RP 615. Walker, Giannini, and Stone are Caucasian. 3RP 42.

Walker, Giannini, and Stone decided to have a bachelor party at the Pole Position Sports Bar in Tacoma. 4RP 296. Fox's Gentleman's Club is located adjacent to the sports bar. *Id.* When the group arrived, they decided to stay at Pole Position bar the entire time. 4RP 299. The bar closed to all patrons at approximately 1:45 a.m. 3RP 40.

As discussed below, Walker, Giannini, and Stone were all victims of a shooting that occurred that night in the bar parking lot. Each of the them sustained serious injuries.

During the shooting, Walker sustained an injury to his head. 4RP 290. His right ankle was shattered and required nine screws. 4RP 289. Giannini was shot in the bicep. 4RP 306-307.

Stone was shot multiple times. One gunshot went through his right arm and came through his forearm. 4RP 209. A second bullet shattered Stone's hip. *Id.* The third shot shattered his femur. *Id.* Stone had to have a titanium rod placed in his leg. *Id.* A fourth bullet went through Stone's scrotum, destroying his right testicle and damaging his left testicle. 4RP 201. Doctors were unsure about how many times he was hit with separate bullets, but he had 11 separate bullet holes in his body. 4RP 211. Due to his injuries, Stone had to have approximately four feet of his large intestine removed. 4RP 209-210.

- a. Witness Rachael Kershaw—described the shooter as wearing a blue sweatshirt and sweatpants.³

After the bar had closed, Rachel Kershaw, a waitress, was on the outside patio drinking and smoking marijuana with a group of bar patrons. 3RP 40-41. The group of people with Kershaw included the shooter, later determined to be the defendant⁴. 3RP 41. Although Kershaw had been drinking and smoking, she believed that all of her motor skills were intact and that she would have been able to drive a car. 3RP 41.

While with defendant on the patio, Kershaw noticed that Walker and his friends were outside in the parking lot just hanging out and talking. 3RP 42. Kershaw saw the defendant pull a gun out of his sweatpants. *Id.* She started backing up and told the defendant's associates that he should put the gun away because there were surveillance cameras in the area. *Id.* Kershaw watched the defendant walk toward a group of white males. 3RP 45.

Kershaw never saw Walker, Stone, and Giannini get into a confrontation with defendant prior to the shooting. 3RP 47-48. She saw

³3RP 72.

⁴ As detailed below, the defendant identified himself as the person in blue depicted on the video surveillance. 6RP 517-518. Based on the defendant's admission, the State will refer to the individual in blue as the defendant in its brief.

defendant hit Walker over the head with what appeared to be the gun, though it could have been a fist. 3RP 52. Within seconds after Walker was hit in the head, shooting began. 3RP 46, 53. Kershaw saw the defendant shoot Stone at point blank range, once in the stomach and twice in the leg. 3RP 40. Once the shooting began, Kershaw hopped a fence and ran back into the bar. 3RP 51. Kershaw and another employee grabbed towels and ran back outside to try and help Stone. 3RP 54. They put pressure on his wounds until the ambulance arrived. 3RP 56.

Based upon security video footage, Kershaw was able to clearly identify the shooter at different times throughout the night. 3RP 64. She identified the shooter both at the door of the bar and behind the patio as wearing a blue sweatshirt and sweatpants. 3RP 72. Kershaw was explicitly able to identify the shooter standing behind the patio at timestamp 1:48:52 of Exhibit 32. 3RP 65. She was also able to identify the shooter standing at the front door to Pole Position from a different video angle included as part of Exhibit 32. 3RP 70.

- b. Witness Tom Chambers—described the shooter as wearing a blue sweatshirt and sweatpants.⁵

Tom Chambers is the manager of Fox's club. 4RP 222. He saw Walker's group arguing with another group of men. 4RP 227. He saw

⁵4RP 250.

Walker, Stone, and Giannini leave the argument and proceed to their car. 4RP 230. However, the people from the other group followed them. *Id.* At first, it appeared that they were all fine as they were shaking hands. *Id.* As soon as Walker turned his back, however, the shooter, who was wearing a blue sweat suit, hit Walker over the head with the gun. 4RP 232; 250. Chambers and another club employee then tried to intervene to prevent the situation from escalating. 4RP 232-233. He saw Stone and Giannini move toward Walker to help. 4RP 235. At that point, he saw defendant begin shooting. *Id.* Once the shooting began Chambers tried to get as many people inside of the club as possible. 4RP 236. Walker came into the club and Chambers gave him paper towels to try and help with the bleeding to his head. 4RP 236, 242. Chambers then went outside to try and help Stone. *Id.*

Once the police arrived Chambers was able to show them the security video from the shooting. 4RP 245-246. He pointed out to the shooter to the police. *Id.* While watching the video in court, Chambers described the shooter as wearing a blue sweat suit. 4RP 250-251. Chambers also noted that the shooter had braided hair. *Id.* Police then took Chambers to see if either of two individuals they had stopped was the shooter. 4RP 247. Chambers told the police that neither one of them was

the shooter, but that they were both with the shooter at the club and had been involved in some capacity in the incident. *Id.*

- c. Witness Jermaine Berry—described the shooter as wearing blue or black clothing.⁶

Jermaine Berry, a cook at Pole Position Bar, was talking to Kershaw at the time of the shooting. 5RP 363. He heard Walker being hit over the head with the gun. *Id.* He turned around and saw someone physically attacking Stone and Giannini. *Id.* Berry saw the shooter pacing back and forth and look irritated just prior to the shooting. 5RP 366-367. He saw the shooter pull a gun from his waistband and began shooting. 5RP 371. Berry saw the shooter driving a silver Impala⁷ and head out on 108th Street toward Pacific Avenue. 5RP 374. Berry was able to tell that the shooter was driving the car and there were no passengers. 5RP 375. He noted that the shooter had braided hair and was wearing navy dark blue or black clothing. 5RP 378. Berry was also able to identify shooter from the video evidence in Exhibit 32. 5RP 382-383.⁸

⁶5RP 378

⁷ The defendant was later arrested driving a Chevrolet Impala. CP 75-76.

⁸ Although Berry could identify the shooter at trial, he was unable to do so in a police photomontage. 5RP 383-384. A similar situation happened with other witnesses. *See* 4RP 255-256, 321.

- d. Detective Sergeant Byron Brockway— interviewed defendant, who admitted that it was him in the surveillance video.⁹

Detective Sergeant Byron Brockway went to the scene the night of the shooting. 5RP 419-420. As part of his investigation he went to the hospital to speak with Giannini and Walker. 5RP 421-422. He eventually determined that defendant was the primary suspect in the case. 5RP 425. Brockway interviewed defendant. 5RP 445. During the interview, the detective showed defendant still photographs from the security camera at Pole Position, which was eventually admitted into evidence as Exhibit 32. 5RP 452. Defendant admitted that the individual in the photographs was him. *Id.* The photographs were from one of the same cameras which Kershaw, Chambers, and Berry viewed and identified the shooter. CP 165-168 (Exhibit 32 with Exhibit 35A-C). The defendant said he was the same person who Kershaw, Chambers, and Berry said was the shooter. *Id.*; *See also* Exhibit 48.

At trial, the defendant affirmed that he was the person in blue depicted in the surveillance video photographs. 6RP 517-518.

⁹5RP 452.

C. ARGUMENT.

1. THE TRIAL COURT PROPERLY EXERCISED ITS DISCRETION BY INSTRUCTING THE JURY ON WPIC 6.52 REGARDING EYEWITNESS IDENTIFICATION TESTIMONY WHEN THERE WERE MULTIPLE EYEWITNESSES WHOM IDENTIFIED THE SHOOTER.¹⁰

Jury instructions are sufficient if they properly inform the jury of applicable case law without misleading the jury, and if they permit each party to argue its theory of the case. *State v. Bennett*, 161 Wn.2d 303, 307, 165 P.3d 1241 (2007). A jury instruction should be readily understood and not misleading to the ordinary mind. *State v. Sublett*, 156 Wn. App. 160, 183, 231 P.3d 231 (2010). A court has considerable discretion in determining the wording of the instructions and which instructions to include. *City of Seattle v. Pearson*, 192 Wn. App. 802, 821, 369 P.3d 194 (2016). The Washington Pattern Jury Instructions (WPIC) have the advantage of thoughtful adoption and provide some uniformity in instructions throughout the state. *State v. Bennett*, 161 Wn.2d 303, 305, 165 P.3d 1241 (2007).

¹⁰ Although defendant argues this for the first time on appeal, a defendant is allowed to raise for the first time on appeal that an instruction was an improper comment on the evidence. *State v. Tili*, 139 Wn.2d 107, 126, 985 P.2d 365 (1999).

Judges cannot “charge juries with respect to matters of fact, nor comment thereon.” Washington Constitution Article IV sec. 16. Their only job is to “declare the law.” *Id.* “A jury instruction that does no more than accurately state the law pertaining to an issue, however, does not constitute an impermissible comment on the evidence by the trial judge.” *State v. Brush*, 183 Wn.2d 5505, 557, 353 P.3d 213 (2015) (quoting *State v. Woods*, 143 Wn.2d 561, 591, 23 P.3d 1046 (2001) (*overruled on other grounds recognized by State v. Schierman*, - Wn.2d -, 415 P.3d 106 (2018))).

Our Supreme Court addressed the issue of witness reliability in *State v. Allen*, 176 Wn.2d 611, 294 P.3d 679 (2013). The court quoted with approval a New Jersey jury instruction and a California jury instruction dealing directly with the witness credibility and reliability. *See Allen*, 176 Wn.2d at 618-619 fn. 3. The Supreme Court Committee on Jury Instructions then took the California instruction and made some modifications to it in order to ensure jury comprehension, neutrality of phrasing, and to adhere to our state’s prohibition on judicial comments on the evidence. WPIC 6.52: Comment.

The *Allen* court, citing *State v. Laureano*, 101 Wn.2d 745, 682, P.2d 889 (1984), *overruled on other grounds by State v. Brown*, 111 Wn.2d 123, 132-133, 761 P.2d 588 (1988), held that a stringent

requirement that a cross-racial identification instruction always be given is not legally required, nor is a rigid prohibition against such instruction. *Allen*, 176 Wn.2d 611 at 624. Rather, the court held that the question of whether such an instruction is appropriately given is reviewed for an abuse of discretion. *Id.* at 624. In *Allen*, the court held that the trial court properly exercised its discretion in declining to give such an instruction. Similarly, in this case the trial court also properly exercised discretion in giving WPIC 6.52.

Black's Law Dictionary defines "eyewitness" as "Someone who personally sees an event; esp., someone who has seen something happen, usu. a crime, and can describe it later." EYEWITNESS, Black's Law Dictionary (10th ed. 2014). It defines "eyewitness testimony" as "A naming or description by which one who has seen an event testifies from memory about the person or persons involved." EYEWITNESS IDENTIFICATION, Black's Law Dictionary (10th ed. 2014).

Here, there is no dispute that under the above definition there were eyewitnesses to the shooting. Defendant even admits that there were three eyewitnesses to the shooting who were not the victims. *See* Brf. of App. at 2 ("Three *eyewitnesses*, all employees of the bar witnessed the shooting and testified at trial....At trial, all three *eyewitnesses* identified a photographic image of a black male leaving the bar taken from the

surveillance video as ‘the shooter’”) (emphasis added); *see also* Brf. of App. at 8 (“[Defendant] identified himself as the person depicted in the video, the same person identified by [the eyewitnesses] as being the shooter.”). As such, there is no contested issue here as to whether there was eyewitness testimony. The only dispute is where there is eyewitness *identification* testimony. *See* Brf. of App. at 13.

In this case, three eyewitnesses were able to testify from memory about the shooter, based upon video evidence. Tony Chambers testified that he knew that the shooter was at the front door to the club. 4RP 250. When he was shown surveillance video by the police, he knew exactly whom the shooter was. CP 165-168 (Exhibit 32); 4RP 250-251. This is the same individual who he saw punch Brandon Walker and the same individual who he saw pull out the gun and shoot. 4RP 251. He was positive that this was the only shooter that night. *Id.* Rachel Kershaw was also completely certain that she was able to identify the shooter from the video. She recognized him as the individual with whom she had been interacting with personally for approximately fifteen minutes before the shooting occurred. 3RP 70.¹¹ She also was able to positively identify him as the individual who had pulled out the gun which was used in the

¹¹ Throughout this portion of the testimony there is a scrivener’s error with the court reporter referencing Exhibit 34 playing and pausing instead of Exhibit 32. *See* RP 70. Exhibit 34 is a photo montage while Exhibit 32 is the relevant video. *See* CP 165-168.

shooting due to the blue sweatshirt and sweat pants he was wearing. 3RP 71-72. Jermaine Berry was also able to identify the shooter due to his face and the clothes that he was wearing. 4RP 382. He also knew that the shooter was the individual who drove off in the silver Chevy Impala. 3RP 383.

Exhibit 32 is the basis for the eyewitness identification used at trial. One of the videos contained in exhibit 32 is a video which shows defendant peering into the front door of Pole Position. CP 165-168 (Exhibit 32). In this video the defendant's face is fully visible. *Id.* Still images of defendant peering into the front door were admitted both as exhibit 32 as well as exhibits 35A-C. In each photograph, defendant's face is visible as well as his articles of clothing: a blue sweatshirt and sweat pants. CP 165-168 (Exhibit 32, 35A-C). The second video contained within Exhibit 32 is a video of defendant outside of the business. While his face is not fully visible there, his profile can be seen as well as the articles of clothing he is wearing: a blue sweatshirt and sweat pants. CP 165-168 (Exhibit 32). Each witness used Exhibit 32 in particular to provide an eyewitness identification of defendant. *See* 3RP 70-72, 4RP 382-383, 5RP 250-251. Chambers, Kershaw, and Berry were all able to provide eyewitness identification of defendant. *Id.* As such, giving an instruction regarding eyewitness identification was not in error.

Defendant claims that there was no eyewitness identification testimony. *See* Brf. of App. at 13. Such claim is without merit. The testimony of Chambers, Kershaw, and Berry, at a minimum, was eyewitness testimony. There is no need for an individual to identify in court the defendant as the perpetrator of the crime for it to be eyewitness testimony. The jury heard all three witnesses testify as to their identification of the shooter. *See* 3RP 70-72, 4RP 382-383, 5RP 250-251. The jury saw what the witnesses saw via Exhibit 32. Moreover, the defendant identified himself as being the person in the video surveillance footage. 6RP 517-518. The jury was able to see defendant's face in that exhibit and hear the witnesses identify him as the shooter. The jury was in a position to make the determination themselves if the eyewitness testimony was credible.

Defendant claims that it is always error for the court to instruct the jury on eyewitness identification over defense objection. *See* Brf. of App. at 11. To support this claim, the defendant relies on *State v. Coristine*, 177 Wn.2d 370, 376, 300 P.3d 400 (2013). *Coristine*, however, is factually distinct from the case at bar. In *Coristine*, the issue was whether the trial court erred in giving an affirmative defense instruction over the defense objection, thereby making strategic decisions on behalf of the defendant. *Id.* The court held that to do so was error.

In this case, however, the trial court did not instruct the jury on an affirmative defense over the defendant's objection. WPIC 6.52 prevents a completely different factual situation than an affirmative defense instruction. WPIC 6.52 acknowledges non-exclusive factors a jury may consider in determining the reliability of eyewitness testimony. The State made appropriate closing arguments using this WPIC. CP 77-106 (Inst. #4); 7RP 613. The defense was also free to make argument based on WPCI 6.52. The "Note on Use" makes it clear that the intention was "...for use solely in criminal prosecutions in which the jury has heard eyewitness identification information." WPIC 6.52: Note on Use. Nothing in the WPIC states that it is an instruction for defense only or was implemented for defendant's use only. As such, defendant's claim fails.

Defendant also cannot claim that the instruction limited his ability to conduct his own defense and impact any ability he had to argue that there were no eyewitnesses in this case. Instead, the objection counsel made was,

Your Honor, I would object only to the degree that I believe the instructions already address this particular issue. And I think this brings a little more light than is necessary as to ability to perceive and all of that, so that would be my argument.

6RP 527-528. Counsel's argument was that the instruction was cumulative, not that it limited the defendant's ability to argue his theory of

the case to the jury. Defendant now for the first time on appeal argues that this limited his ability to present his theory of the case. Such an argument is nowhere in the record and should be rejected. Defense's argument focused around the unreliability of the witnesses and the allegedly faulty investigation by law enforcement. 6RP 585-592. The argument on witness reliability focused on how the witnesses were unable to recollect key details of what they saw and issues with the photomontages which were presented to them. 6RP 585-590. Nowhere does counsel argue, or even try to argue, that there were no eyewitnesses. Instead, his argument is about how their recollections should not be trusted. This is exactly what WPIC 6.52 was designed for: create arguments related to eyewitness reliability. *See* WPIC 6.52: Comments.

In defendant's opening brief, he asserts that the State used WPIC 6.52 in closing to "bolster the non-existent identifications" in the case. Brief of Appellant, page 17. The defendant does not, however, allege that the prosecutor committed misconduct or that his attorney was ineffective for failing to object to the State's comments, nor could such a claim be valid. The State presented argument based on the facts presented and based on an approved WPIC instruction that was appropriate in this case. The question of whether WPIC 6.52 was properly given is a separate analysis from whether the State presented proper argument based on it. In

this case, the defendant is only raising the former on appeal, making the State's argument in closing irrelevant to this court's inquiry.

The trial court in this case properly exercised its discretion in instructing the jury using WPIC 6.52. The defendant cannot present any authority to support his claim that WPIC 6.52 can only be proposed by the defendant and not the State. The trial court did not improperly comment on the evidence by instructing the jury on WPIC 6.52, as it was an appropriate instruction based on the facts of this case.

D. CONCLUSION.

For all of the above stated reasons, the State requests that the defendant's convictions be affirmed.

DATED: May 25, 2018.

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Certificate of Service:

The undersigned certifies that on this day she delivered by U.S. mail or ABC-LMI delivery to the attorney of record for the appellant and appellant c/o his attorney true and correct copies of the document to which this certificate is attached. This statement is certified to be true and correct under penalty of perjury of the laws of the State of Washington. Signed at Tacoma, Washington, on the date below.

5.25.18 Therese Kar
Date Signature

PIERCE COUNTY PROSECUTING ATTORNEY

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