

FILED
Court of Appeals
Division II
State of Washington
7/23/2018 8:18 AM

No: 51506-7-II

In the Court of Appeals of the State of Washington
Division Two

Brennan Heating and Air Conditioning LLC

Plaintiff / Respondent

vs.

Jeffrey M. McMeel

Defendant / Appellant

Reply Brief of Appellant

Appeal from Thurston County Superior Court Case No. 17-2-06110-34,
The Honorable James J. Dixon

Jeffrey M. McMeel,
Appellant

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REPLY

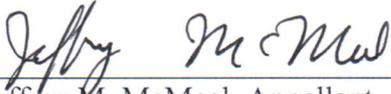
Appellee Brennan Heating and Air Conditioning's response to Appellant's brief for the most part is an appalling attempt to distract this court from the unwarranted conduct of the trial court by continuing the personal attacks against McMeel which surfaced in the Petition for an Order to Show Cause. In addition to the uncalled for personal attacks, Brennan distorted McMeel's arguments and insulted his appeal brief. None of this is productive nor does it rise to the level of an honest attempt to rebut McMeel's appeal.

Brennan fails to substantively controvert any of the trial court errors, especially those related to jurisdiction. Specifically there is no overt denial that the trial court was operating as a court of limited jurisdiction in a "statutory" jurisdiction. The failure to deny is a concession. *In re Pullman*, 167 Wn.2d 205, 212 n.4, 218 P.3d 913 (2009). Additionally, Brennan does not address McMeel's arguments regarding abuse of discretion by the trial court with regards to the judge's refusal to reveal the jurisdiction of the court upon repeated challenges. *See* Brief of Appellant, pp. 23-30; Brief of Respondent. Brennan's failure to address this foundational issue may also be treated as a concession, *Pullman*, *supra*.

CONCLUSION

For all the reasons set forth in Brief of Appellant, the Court of Appeals must reverse the lower court's judgment and award McMeel reasonable costs.

Respectfully submitted this 22nd day of July, 2018;



Jeffrey M. McMeel, Appellant

Declaration of Service;

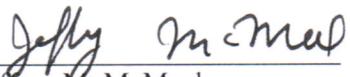
I, Jeffrey McMeel, on July 23rd, 2018, deposited a copy of this Reply Brief of Appellant in the mail to Brennan Heating and Air Conditioning LLC at the following address:

Attorney for Brennan Heating and Air Conditioning, LLC

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I declare under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct.

Signed at Belleuve, State of Washington, on July, 23rd, 2018.



Jeffrey M. McMeel

JEFFREY MCMEEL - FILING PRO SE

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Transmittal Information

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