FILED
Court of Appeals
Division II
State of Washington
3/7/2019 4:25 PM

No. 51995-0

IN THE COURT OF APPEALS
STATE OF WASHINGTON

DAN THOMSON and TIM THOMSON

Appellants,

v.

R and H Family, LLC.

Respondent.

AMENDED BRIEF OF APPELLANTS

DAN THOMSON and TIM THOMSON

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I. INTRODUCTION

This appeal concerns a disputed piece of property, a map of which is attached as Appendix A. The trial court found that adverse possession of this property began to accrue in 1981, when a Rayonier Timber Company employee surveyed and marked the remote timber-property boundary. The disputed areas are in the lowest southeast corner of Appellant's property and is adjacent to R&H Family, LLC's ("R&H") property. R&H successfully argued that their seasonal use (grazing cattle) and placing gravel along a PUD pole-line easement met the elements of adverse possession. But, by 1981, R&H had placed no improvements, structures or fences along the PUD easement that might have provided some notice of the adverse possession. The cattle fence in the disputed farm area that was present in 1981, is presumed permissive because there is a reasonable inference of a neighborly accommodation. Rayonier never returned to their property until 1993.

The Legislature enacted RCW 7.28.085 in 1998, requiring clear, cogent, and convincing evidence of open and notorious possession of forestland, via substantial improvements valued more than $50,000. The use of a road within a PUD utility easement, free-range cattle grazing, and barbed-wired cattle fences in timber property are presumed permissive under controlling precedent. They are not sufficiently open and notorious to

put a landowner on notice of an adverse possession claim. This Court should reverse.

II. ASSIGNMENTS OF ERROR AND ISSUES

Assignments of Error

No 1:

The trial court erred as a matter of law in concluding that R&H's possession of the Disputed Farm Area was hostile. (CP 25)

No:2:

The trial court erred as a matter of law in concluding that R&H's use of the road over the PUD easement was open and notorious. (CP 26)

No 3:

The trial court erred as a matter of law in concluding that R&H use of the Disputed Triangle Area was hostile possession. (CP 27)

No 4:

The trial court erred as a matter of law in concluding that RCW 7.28.085 does not apply. (CP 27)

Issues Pertaining to the Assignments of Error

No. 1:

Whether Rayonier had actual or constructive notice of the Respondent's adverse possession claim when in the process of surveying and marking the boundary, the Rayonier surveyor crossed a PUD easement road used by the Thomas Family.

No. 2:

Whether a road over a PUD easement and free-range cattle grazing thereon constitute actual, open and notorious possession, and hostile possession of a forestland.

No. 3:

Whether a barbed-wire cattle fence constitutes actual, open and notorious possession, and hostile possession of forestland.

III. STATEMENT OF THE CASE

A. The parties and the disputed property.

R&H Family, LLC and Barry Thomas, (collectively "R&H") own several contiguous parcels along the Sol Duc River in Forks, Washington. (Ex 3.) These parcels are collectively referred to as "R&H Properties." R&H Family, LLC owns tax parcels Nos. 142817430000 and 42817410000, approximately 70 acres. *Id.* Barry Thomas owns tax parcel No. 142817410050, approximately 5 acres. *Id.*

Rayonier Forest Resources, L.P. ("Rayonier") owned the adjacent timbered property to the north of the R&H Properties until January 21, 2010, when the Thomsons purchased the property. (RP 24, Ex15.) The property consists of 89 acres of timber property. (RP 24, 51-52, Ex. 15) In 1981, Rayonier owned approximately half-a-million acres on the Olympic Peninsula and Western Washington. (RP 49.) Rayonier does not have the resources to police all its acreage, generally relying on the engineers who mark timber for harvesting to discover any encroachments. (RP 49-50.)

B. The barbed-wire fencing on the western edge of the cleared farm area forms the disputed farm area.

Predominately on R&H properties, there is a cleared farm area. (RP 116.) This area has been enclosed with barbed-wire fencing since the Thomas family acquired the property in the 1960's. (RP 116.) The true boundary between Rayonier's property and Respondent passes through this cleared area. (RP 116.) This area is called the disputed farm area. The disputed farm area is north of the disputed triangle area and is reflected on Rayonier's records as a "wildlife conservation area", and, therefore "no cutting" was permitted. (Ex 15.) On Exhibit 15, the inside the green highlights designates Rayonier's timber harvest in 1994. (RP 55, 59, 61).

C. In the 1970s, Thomas resurfaced the existing PUD utility road along the PUD pole-line easement, a road that forms the northern boundary of the disputed triangle area.

In the late 1970s, Russell Thomas hired workers to use gravel from the Thomas pit to resurface the PUD utility road and PUD pole line located partially on Rayonier's property. (RP 144 -45, 160.) The Thomas family and R&H have used the road in the winter to dump hay feed along the easement every couple of weeks. (RP 122-23.)

In the late 1970s, PUD removed the electric overhead power lines and poles, excavated the easement, and placed an underground electric cable along the north edge of the existing utility access road. (RP 143, 144-

45, 160.) Remnants of the poles remain today, including one just outside the disputed triangle area. (RP 143.)

The PUD easement road bisects the southern corner of the Rayonier property ("disputed triangle") (RP 25-28; Ex 4.) This disputed triangle consists of the PUD easement and the wetlands south of the PUD easement (RP 25-28, 177-78, Ex 52.) Cattle did not graze in the wetlands. (RP 25-28, 179.) The disputed triangle contains no improvements, storage, or other personal property. (RP 118-19, 156-58.)

D. In 1981, a Rayonier employee blazed boundaries and set corner monuments, but did not mark as a boundary the PUD easement, which was of record.

In 1981, Rayonier employee Gerald Keck surveyed Rayonier's property, including the disputed triangle. (Exs 17, 18.) In addition to creating a survey, Gerald Keck also blazed the property line, which involved physically walking the property line, marking it with "blaze" marks on the trees, and placing brass monuments at the corners. (Ex 17.) A copy of the recorded 1948 PUD easement was in Rayonier's possession at the time of the 1981survey. (RP 59.) No fence existed in or near the disputed triangle when Rayonier surveyed its property in 1981. (RP 115-16; Exs 17, 18.)

Sometime after Rayonier surveyed its property in 1981, the Thomas family built a three-wire barbed fence starting from the northwest corner of the farm, east along the north boundary line of the disputed triangle. (RP 115-16.) This was a cattle fence. (RP 107, 151-152.)

E. Rayonier first treated the easement as a boundary in 1993.

For the first time since the 1981 survey, Rayonier returned to its property north of the disputed triangle in 1993, to prepare for a timber sale. (RP 52.) Rayonier cut the timber up to the fence line along the boundary of the disputed triangle, which Rayonier designated a wildlife conservation area. (RP 54-55.)

F. Procedural History

On July 1, 2016, Appellants Dan and Tim Thomson filed a Complaint to quiet title to real estate and for ejectment. (CP 577.) Respondents counterclaimed adverse possession of the land in dispute. (CP 570.)

On May 19, 2017, the court denied Appellant's motion for summary judgment on the issue of estoppel. The court found that Appellant's evidence was insufficient to conclude summarily that Respondent should be estopped from its claim of adverse possession.

On January 22 and 23, 2018, a non-jury trial was held on the issues. (CP 563.) Respondents prevailed on its counterclaim of adverse possession and Appellants appealed the trial court's decision.

IV. ARGUMENT

A. THE STANDARD OF REVIEW IS SUBSTANTIAL EVIDENCE ON FINDINGS AND *DE NOVO* ON THE CONCLUSION OF ADVERSE POSSESSION.

Adverse possession presents a mixed question of law and fact: "Whether the essential facts exist is for the trier of fact; but whether the facts, as found, constitute adverse possession is for the court to determine as a matter of law." *Chaplin v. Sanders,* 100 Wn.2d 853, 863, (1984) (quoting *Peoples v. Port of Bellingham,* 93 Wn.2d 766, 771, 613 P.2d 1128 (1980)). The challenged Findings are reviewed for substantial evidence. *Harris v. Urell*, 133 Wn. App. 130, 137, 135 P.3d 530 (2006). The Court thus considers whether substantial evidence supports the challenged findings and, if so, whether those findings in turn support the conclusions of law. *Id.* (citing Ridgeview Props. v. Starbuck, 96 Wn.2d 716, 719, 638 P.2d 1231 (1982)). Evidence is substantial when it is of a sufficient quantity to persuade a fair-minded, rational person that the finding is true. *Id.* (citing State v. Hill, 123 Wn.2d 641, 644, 870 P.2d 313 (1994)). Whether the facts properly found establish each element of adverse possession is a question of law, reviewed *de novo*. *See*, *Petersen v. Port of Seattle,* 94 Wn.2d 479, 485, 618 P .2d 67 (1980).

B. THE TRIAL COURT ERRED IN PERMITTING ADVERSE POSSESSION OF THE DISPUTED TRIANGLE AREA AND DISPUTED FARM AREA.

The trial court erred in concluding that the statute of limitations for adverse possession began to accrue as to the disputed farm area and disputed triangle area in 1981, where R&H's use was neither open and notorious nor hostile as a matter of law.

1. *The law of adverse possession.*

Respondents must establish that their possession was: (1) exclusive, (2) actual and uninterrupted, (3) open and notorious, and (4) hostile and under a claim of right made in good faith. *Chaplin, supra*, 100 Wn.2d at 857. All of these elements must exist concurrently for at least 10 years. *ITT Rayonier, Inc. v. Bell*, 112 Wn.2d 754, 757, 774 P.2d 6 (1989); RCW 4.16.020. Because courts presume that the holder of legal title is in possession, "the party claiming to have adversely possessed the property has the burden of establishing the existence of each element." *ITT Rayonier, supra,* 112 Wn.2d at 757.

2. *The trial court erred in concluding that R&H's use of the road over the PUD easement was open and notorious.*

a. Rayonier did not have actual notice of Respondents' adverse possession claim.

The trial court erred in finding that in 1981, Rayonier had inquiry notice of R&H's adverse possession claim, where Rayonier's surveyor blazed the boundaries and marked the corner in the disputed triangle area.

A claimant can satisfy the open and notorious element by showing either that the title owner had actual notice of the adverse use throughout the statutory period or that the claimant, or his predecessor -in-interest, used the land such that any reasonable person would have thought he owned it. *Ofuasia v. Smurr*, 198 Wn. App. 133, 144, 392 P.3d 1148 (2017); (*citing Riley v. Andres*, 107 Wn. App. 391, 396, 27 P.3d 618 (2001)); *Shelton v. Strickland*, 106 Wn. App. 45, 51, 21 P.3d 1179 (2001). The acts must be unmistakably obtrusive:

> The acts constituting the warning which establishes notice must be made with sufficient obtrusiveness to be unmistakable to an adversary, not carried out with such silent civility that no one will pay attention.... Real property will be taken away from an original owner by adverse possession only when he was or should have been aware and informed that his interest was challenged.

Bryant v. Palmer Coking Coal Co., 86 Wn. App. 204, 213, 936 P.2d 1163 (1997) (*quoting Hunts v. Mathews,* 8 Wn. App. 233, 236-37, 505 P.2d 819 (1973), *overruled on other grounds by Chaplin,* 100 Wn. 2d 853).

In 1981, only a gravel road over the existing historical PUD easement was there for the Rayonier surveyor to see near the disputed triangle, which consists of the PUD easement and the wetlands south of the PUD easement. (RP 25-28.) The disputed triangle contained no improvements, nor even storage for any personal property. (RP 156-58.) Expert land surveyor Wengers testified a road does not necessarily signify ownership (RP 64.):

> [W]hat the surveyor is supposed to show is anything that may affect title to the property. It could be a fence line, it could be a hedge row, it could be anything that would be perceived as a difference in the ownership between one side of the line and the other. A road doesn't always do that.

The Court of Appeals has explained that a road may establish a clear boundary line between two properties, when "construction and use of a road" is facilitating the use establishing adverse possession in a disputed area. *Bryant v. Palmer Coking Coal, Co.* 86 Wn. App. 204, 213, 936 P.2d 1163 (1997): But in the *Bryant* case, the disputed property's adverse use included "a cut road", "cleared openings", "a structure", "cut wood", "parked 50 to 100 vehicles", "keeping a horse and guard dog", and "a 7,000-gallon diesel fuel tank, all on site." *Id.* at 213-14.

This case is different. In 1981, the only improvement that existed in the disputed triangle was gravel on a road over a historical PUD easement. (RP 118-19, 156-58.) The only uses were R&H traveling across the road

and seasonally feeding cattle. (RP 118-19, 156-58.) Barry Thomas' testimony established that no fence or other improvements or personal property were present on the disputed triangle in 1981. (RP 118-19, 156-58.) The trial court erred.

b. Rayonier did not have constructive notice of R&H's alleged adverse possession of the disputed triangle.

But the trial court found that the mere road put Rayonier's surveyor on inquiry notice.[1] (RP 200, 221.) As explained *supra*, this is incorrect.

But even a barbed-wire fence and road on a PUD easement on the backside of timber property that is in wild country and only accessible and visible from the R&H property is not substantial evidence of notice to the true owner. *Murray v. Bousquet*, 154 Wash. 42, 48, 280 P. 935 (1929). In *Murray*, the Supreme Court held that the character of the property played an important role in a court's decision whether the possession and use were open and notorious. 154 Wash. at 48. The Court noted that (1) the owner of the land being claimed was an absentee landlord; (2) the land itself "is wild country, broken, mountainous, very sparsely settled, and a small portion of it might be taken and held for years without any one knowing whether there

[1] The trial court did not find that the fence, which was constructed after Rayonier left the property in 1981, provided constructive notice to Rayonier. The court rather concluded that R&H's adverse possession claim vested at the latest in 1991. RP 221. Had the trial court relied on the fence to provide constructive notice to Rayonier, it would have concluded that Respondent's title vested at the latest in 1995. RP 221.

was a trespass or not"; and (3) the use of the land and fence was for cattle grazing. *Id.* (emphasis added). Such "possession" was not substantial enough to provide even constructive notice to the true owner. 154 Wash. at 49.

This case is similar to *Murray, supra*. The R&H and Rayonier properties are large parcels in a rural, unpopulated area located on the west end of the Olympic Peninsula. (RP 76, 79, 108) Rayonier owns hundreds of thousands of acres of forestland in Washington. (RP 50) Rayonier testimony established that after the 1981 survey, even Rayonier did not come back to the property for 12 years, until 1993. Rayonier could not practically police such vast boundaries. (RP 50) An ambiguous "encroachment" (just an easement road) on the backside of one of Rayonier's vast holdings, lacking a reasonable means of access or discovery, could never have been discovered until logging operations might eventually uncover it.

As a matter of law, the trial court's conclusion – directly contrary to *Murray* – that a road, or even a cattle fence, and cattle grazing put Rayonier on inquiry notice is legally incorrect. Absent this conclusion, R&H failed to prove open and notorious possession. This Court should reverse on this independently sufficient basis.

3. *The use of an easement road, running free-range cattle and a barbed-wire cattle fence are presumed permissive, not adverse or hostile.*

The trial court also erred in finding and concluding that R&H established adverse or hostile use. (RP 222-23) The use of a road on an existing PUD easement, running free-range cattle and a cattle fence are presumed permissive because: (1) the property is vacant, open, unenclosed, and unimproved; and (2) it is reasonable inference that the use was permitted by neighborly sufferance or acquiescence.

Permission from the true owner, express or implied, negates the hostility element because permissive use is inconsistent with making use of property as would a true owner. *Teel v. Stading,* 155 Wn. App. 390, 393, 228 P.3d. 1293, 1295 (2010).

"The only legal difference between a prescriptive easement and adverse possession is the element [of] exclusivity. The open and notorious element for a prescriptive easement is identical to the open and notorious element of [an] adverse possession claim" (RP 186.) In a recent Court of Appeals case, Division I reaffirmed that the "elements required to establish adverse possession and prescriptive easements are the same." *Workman v. Klinkenberg,* __ P.3d __, 6 2018 WL 6303705; *citing Kunkel v. Fisher, 106 Wash. App. 599, 602-03, 23 P.3d 1128 (2001); accord* 17 William B. Stoebuck & John W. Weaver, Washington Practice: Real Estate: Property Law § 2.7, at 99 (2d ed. 2004)

In *Gamboa*, our Supreme Court articulated three types of cases in which an adverse use is presumed permissive: (1) cases involving unenclosed land; (2) cases involving enclosed or developed land, but it is reasonable to infer that the use was permitted by neighborly accommodation; and (3) cases where the true owner created or maintained a road and his or her neighbor used the road in a noninterfering manner. 183 Wn.2d at 44. When someone enters onto the land of another, that person "does so with the true owner's permission and in subordination to the latter's title." *Id.* (quoting *Northwest Cities v. Western Fuel Co.,* 13 Wash.2d 75, 84, 123 P.2d 771 (1942)). There is "an initial presumption of permissive use to enclosed or developed land cases in which there is a reasonable inference of neighborly sufferance or acquiescence. *Id.* at 47. "What constitutes a reasonable inference of neighborly sufferance or acquiescence is a fairly low bar." *Id.* at 51 Where use is "'permissive in its inception,' there is a presumption of permissive use that 'cannot ripen into a prescriptive right, no matter how long it may continue, unless there has been a distinct and positive assertion by the dominant owner of a right hostile to the owner of the servient estate.'" *Id.* at 45 (quoting *Nw. Cities*,13 Wn.2d at 84)

Moreover, where the property in question is "vacant, open, unenclosed, and unimproved," use by an individual other than the landowner is presumed to be permissive. *Sharp v. Kieszling*, 35 Wn.2d 620,

623, 214 P.2d 163 (1950); *Granite Beach Holdings, LLC v. Dep't of Natural Res.*, 103 Wn. App. 186, 200, 11 P.3d 847 (2000).

a. The Disputed Farm Area.

Here, Respondent's barbed-wire fence in the Disputed Farm Area left the property line and followed the tree line that crossed over into Rayonier's property. (RP 25, 116.) This section of fence existed prior to the Thomas's family acquisition of the properties in the 1960s'. (RP 111) In 1981, This fence existed when Rayonier surveyed the boundary line. Despite, the barbed-wire fence existence, the cattle fence is still presumed permissive because there is a reasonable inference of neighborly accommodation.

Rayonier is a timber company that, in 1981, owned approximately half-a-million acres on the Olympic Peninsula and Western Washington. (RP 50.) The disputed farm area is reflected Rayonier's records as a "wildlife conservation area" and therefore "no cutting" was permitted. (Ex 15.) Rayonier has a policy that if an encroachment does not adversely affect their timber, it will permit the encroachment to continue. (RP 60.), a policy which appears to be both neighborly and in line with Washington State case law involving forestlands.

There is a reasonable inference in this case that if Rayonier saw the Disputed Farm Area cattle fence, it acquiesced to the fence because it did not affect the timber harvest. The burden was on Respondent to put forth

evidence that it made a positive assertion of possession adverse and hostile to the rights of the true owner. *Gamboa v. Clark*, 183 Wn.2d 38, 53, 348 P3.d 1214 (2015). R&H failed to do so.

Therefore, Respondent failed to overcome the presumption of permissive use in the disputed farm area and could not have acquired title by adverse possession in the disputed farm area. Again, this Court should reverse.

b. The Disputed Triangle Area.

Here, Rayonier's property was vacant, open, unenclosed, and unimproved in 1981. (RP 23, 52-53, 116, Ex 21.) Therefore, Respondent's use of the road on the PUD easement is presumed permissive. Respondent presented no evidence that they asserted an adverse use or that Rayonier recognized by some act or admission that Respondent had a such a claim. Respondent failed to overcome the presumption of permissive use. It could not have acquired title.

At all times, the Thomson's property has been commercial timber forestland. In 1981, after Rayonier surveyed its property and set concrete monuments at the corners, the Thomas Family built a three-wire barbed fence starting from the northwest corner of the farm east along the north boundary line of the disputed triangle. (RP 115-16.) This cattle fence enclosed a wildlife conservation area, where no one may harvest timber. (RP 55-56.) The only improvements on Rayonier's property were logging

roads and the pole-line PUD easement in the disputed triangle. (RP Ex 27, 40.) Rayonier could not use the timber in the disputed triangle, so R&H's cattle fence and operations did not interfere with Rayonier's use.

In sum, Respondent's fence and road use are presumed permissive because there is a reasonable inference of a neighborly sufferance or acquiescence. Respondent made no assertion that their use was adverse or that Rayonier had indicated by some act or admission that the Respondent's use was adverse. Respondent thus failed to overcome the presumption of permissive use and could not have acquired title by adverse possession. This Court should reverse on this independently sufficient basis.

C. THE TRIAL COURT ERRED IN CONCLUDING THAT RCW 7.28.085 DOES NOT APPLY.

The trial court also erred in concluding that RCW 7.28.085 does not apply, since Rayonier could not have had actual or constructive notice of R&H's adverse possession claim before June 11, 1988. The statute applies to adverse possession claims that have not transferred title prior to June 11, 1998. This is such a claim.

Enacted on June 11, 1998, the statute states that after its enactment, an adverse possession claimant seeking title to forestlands must establish by clear and convincing evidence that the claimant has either: (1) "made or erected substantial improvements" in order for their possession to be

deemed 'open and notorious; or (2) "occupied the lands at issue and made continuous use thereof for at least ten or more years in good faith reliance to location stake or boundary markers set by a registered land surveyor." RCW 7.28.085 (1) and (2). "Substantial improvements" are improvements where costs exceed fifty-thousand dollars. RCW 7.28.085(3)(d). This statute applies where, as here, (1) the person defending against the claim owns more than twenty acres of forestland in the State of Washington; and (2) title was not already transferred by adverse possession prior to June 11, 1998. The trial court erred in failing to apply this statute.

Rayonier has always owed more than twenty acres of forestland. (RP 50)

Title could not have passed to Respondents prior to June 11, 1998, for the simple reason that R&H's possession could not have been deemed open and notorious until 1993, when Rayonier returned to the property for logging. As discussed *supra*, Rayonier did not have actual or constructive notice of the fence prior to June 11, 1988, which was the last day the ten-year statute of limitations could accrue to avoid application of the statute, even if all of the other elements of adverse possessions had been established. R&H was thus obligated to present clear and convincing evidence either that the fence and the graveled PUD easement road was a "substantial improvement", or that it acted in reliance upon a location stake or boundary

markers set by a registered land surveyor. No such evidence was presented. The statute therefore applies.

D. THE THOMSONS ARE ENTITLED TO AN ATTORNEY FEE AWARD.

Under RCW 7.28.083 and RAP 18.1, the Thomsons ask this Court to reverse the award of attorney fees and costs ordered by the trial court, to remand for a fee award to the Thomsons, and to award them fees on appeal. Fees may be awarded as part of the costs of litigation when there is a contract, statute, or recognized ground in equity for awarding such fees. equity. *Buck Mountain Owner's Ass'n v.* Prestwich, 174 Wn. App. 702, 703, 308 P.3d 644 (2013). Here, the Thomsons are entitled to attorneys fees the prevailing parties under RCW 7.28.083, having successfully defended a claim of adverse possession.

V. CONCLUSION

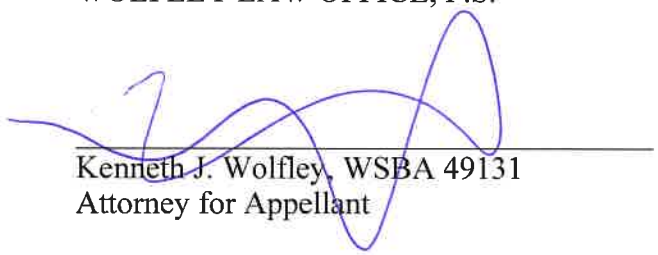
Respondent has not established the elements of adverse possession existing concurrently for ten years prior to June 10, 1988. The use of a PUD easement road, running free-range cattle, and cattle fences are not open and notorious and are presumed permissive in any event. Respondent failed to rebut the presumption of permissive use where the land is vacant, unenclosed, and undeveloped. Respondent failed to rebut the presumption of permissive use by neighborly accommodation the land is enclosed. At no time prior to 1993, did Rayonier have actual or constructive notice of

Respondents possession. As a result, RCW 7.28.085 applies, requiring Respondents to prove by clear, cogent, and convincing evidence that their possession was based on improvements whose costs exceed fifty thousand dollars or based on corner markers set by a licensed land surveyor. No such evidence was presented. This Court should reverse the Judgment and fee awards, remand for a determination of fees to the Thomsons, and award them attorney fees and costs on appeal.

DATED this 7 day of March, 2019.

Respectfully submitted,

WOLFLEY LAW OFFICE, P.S.



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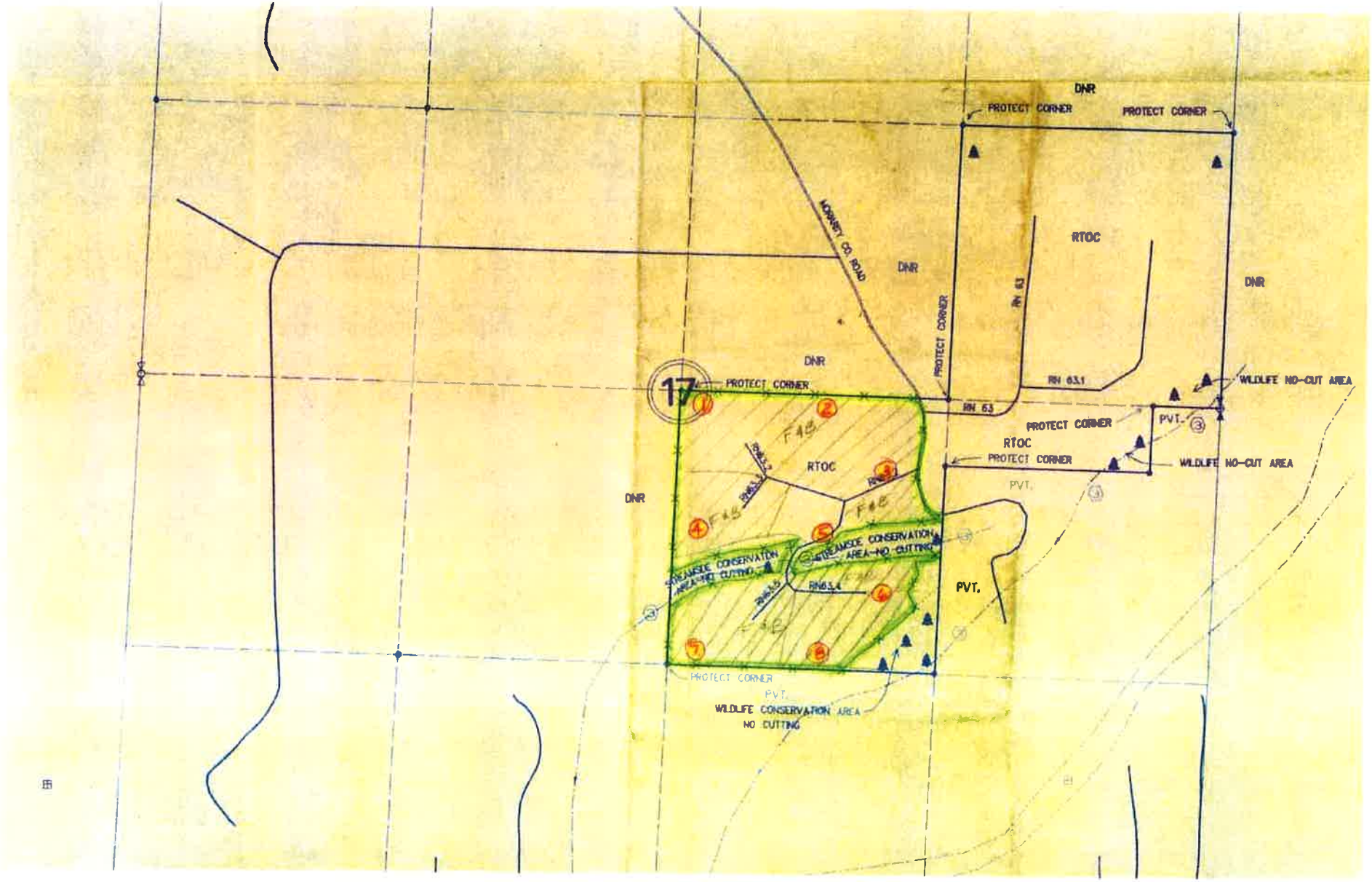
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Appendix A

WOLFLEY LAW OFFICE, P.S.

March 07, 2019 - 4:25 PM

Transmittal Information

Filed with Court:	Court of Appeals Division II
Appellate Court Case Number:	51995-0
Appellate Court Case Title:	Tim Thomson and Dan Thomson, Appellants v. R and H Family, LLC, et al., Respondents
Superior Court Case Number:	16-2-00496-5

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COURT OF APPEALS
STATE OF WASHINGTON
DIVISION II

TIM THOMSON, an unmarried man, and DAN THOMSON, an unmarried man, Plaintiffs, vs. R AND H FAMILY, LLC. A Washington State Limited Liability Company, Defendant.	**NO. 51995-0-II** **DECLARATION OF MAILING**
BARRY THOMAS, Third-Party Plaintiff, vs. TIM THOMSON, an unmarried man, and DAN THOMSON, an unmarried man, Third-Party Defendants.	

KM GERDTS declares under penalty of perjury of the laws of the State of Washington, that on this day she sent Amended Brief of Appellants Dan Thomson and Tim Thomson to Clerk of the Court for filing, with copies to Defendant's attorney, via 1st Class Mail, Portal and email to:

Derek Byrne **Portal**
WA State Court of Appeals
Division Two – 950 Broadway, Ste 300
Tacoma WA 98402-4454

Adam R. Asher
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DATED at Port Angeles, Washington, this 7 day Mar, 2019.

Legal Secretary to Kenneth J. Wolfley,
Attorney for Plaintiff-Third-Party Defendants

WOLFLEY LAW OFFICE, P.S.

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Transmittal Information

Filed with Court:	Court of Appeals Division II
Appellate Court Case Number:	51995-0
Appellate Court Case Title:	Tim Thomson and Dan Thomson, Appellants v. R and H Family, LLC, et al., Respondents
Superior Court Case Number:	16-2-00496-5

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