

FILED
Court of Appeals
Division II
State of Washington
11/13/2019 4:41 PM
No. 52604-2-II

**Court of Appeals, Div. II,
of the State of Washington**

In re Marriage of

Patricia Bell,

Appellant,

v.

Carlo DiLorenzo,

Respondent.

Reply Brief of Appellant

Kevin Hochhalter, WSBA # 43124
Attorney for Appellant

Olympic Appeals PLLC
4570 Avery Ln SE #C-217
Lacey, WA 98503
360-763-8008
kevin@olympicappeals.com

Table of Contents

1. Reply Argument	1
1.1 The trial court abused its discretion in denying Patty’s motions for recusal and change of venue in the face of public comments by Pierce County judges bemoaning Patty’s discovery of visitation supervisor Kate Lee’s prior crimes of dishonesty.	1
1.1.1 Patty preserved this issue for appeal.	1
1.1.2 There was reason to believe that the judges’ impartiality could be reasonably questioned and that an impartial trial could not be had.....	4
1.2 The trial court erred in failing to consider the \$700,000 partial inheritance distributions received by Carlo as wealth accessible to him for purposes of attorney’s fees under RCW 26.09.140 and of deviation from the standard child support calculation.	7
1.3 The trial court abused its discretion in finding Patty guilty of contempt.	15
1.4 The Court should deny Carlo’s request for attorney’s fees.	17
2. Conclusion	19

Table of Authorities

Cases

<i>Graves v. Duerden</i> , 51 Wn. App. 642, 754 P.2d 1027 (1988)	16
<i>Johnston v. Beneficial Mgmt. Corp. of Am.</i> , 96 Wn.2d 708, 638 P.2d 1201 (1982)	16
<i>Newcomer v. Masini</i> , 45 Wn. App. 284, 724 P.2d 1122 (1986)	3
<i>Sherman v. State</i> , 128 Wn.2d 164, 905 P.2d 355 (1995)	4
<i>Snow v. Nellist</i> , 5 Wn. App. 140, 486 P.2d 117 (1971)	8
<i>Streater v. White</i> , 26 Wn. App. 430, 613 P.2d 187 (1980)	18, 19

Statutes

RCW 4.12.030	4
RCW 19.40.041	9, 10
RCW 19.40.051	9
RCW 19.40.071	10
RCW 26.09.140	18
RCW 26.26A.400.....	18
RCW 26.26B.060.....	17
RCW 62A.3-303	8

1. Reply Argument

1.1 The trial court abused its discretion in denying Patty's motions for recusal and change of venue in the face of public comments by Pierce County judges bemoaning Patty's discovery of visitation supervisor Kate Lee's prior crimes of dishonesty.

1.1.1 Patty preserved this issue for appeal.

Carlo incorrectly argues that Patty failed to preserve this claim of error because her arguments in the trial court did not use the word "bias" and did not raise the appearance of fairness doctrine or the standard for recusal. Br. of Resp. at 16-17. The record shows that Patty preserved this issue for appeal.

Patty's first request for recusal came in her motion for reconsideration of the trial court's December 2017 restraining order and order on motion for revision. CP 166-72. In that motion, Patty requested, "I kindly ask Judge Kitty-Ann Van Doorninck to recuse herself if she might have a personal bias or prejudice concerning me..." CP 171. Patty argued, "CJC Canon 3(D)(1)(a) provides in part that judges should disqualify themselves in a proceeding in which their impartiality might be questioned, including but not limited to situations in which: (a) the judge has a personal bias or prejudice concerning a party..." CP 171. The motion was considered by the trial court and denied

without explanation. CP 208. This was enough in itself to preserve the recusal issue, but there is more.

Patty's opening brief in this appeal called the court's attention to CP 215, 247, and 408. Br. of App. at 13. At CP 215, paragraph (c), Patty specifically asked for Judge Van Doorninck to recuse herself due to bias relating to Kate Lee. This request was part of a list of requests made at the end of a document titled, "New Evidence that G.A.L. Kate Lee is an Unqualified Felon; **Motion for Judge Van Doorninck to Recuse Self** for Retaliation Against Party Raising this Actual Fact." CP 209 (emphasis added). In this document, Patty referred again to the impartiality required by Judicial Canons. CP 213 (paragraph 30). She also provided a form "Order of Recusal" for Judge Van Doorninck to recuse herself. CP 216.

At CP 247, paragraph 13, Patty indicated her desire for a change of venue to King County, believing she could no longer have a fair trial in Pierce County due to the Kate Lee scandal. This request was part of a document titled, "Petitioner's Affidavit and Notice of Request for Continuance and Change of Venue to King County." CP 245. In this request for change of venue, Patty referred to the standards in *State v. Crudup*, 524 P.2d 479. CP 252-53. Carlo's response to this document recognized Patty's earlier arguments about impartiality and

argued at length that the appearance of fairness doctrine did not require a change of judge or venue in this case. CP 288-93.

In ruling on the motions, the trial court considered these documents, only excluding documents filed after Jan. 23, 2017. CP 406.

CP 408 is Patty's motion for reconsideration of denial of the motion to change venue. In that motion she emphasizes that the standard should be an "appearance of impropriety." CP 409, line 5; 412, paragraph 2. Patty cited multiple cases and the Code of Judicial Conduct, Rules 1.2 and 2.2 and comments thereto, arguing for the appearance of fairness doctrine. CP 415-17. Patty argued that all Pierce County judges should be disqualified because, due to the public comments and the internal memo, their impartiality might reasonably be questioned. CP 416. The trial court considered and denied the motion for reconsideration. CP 429.

Even if Patty's arguments in the earlier motions were not enough to preserve the issue, this motion for reconsideration thoroughly addressed the issue, giving the trial court the opportunity to correct its error. A party may preserve an issue for appeal by bringing it in a motion for reconsideration. *Newcomer v. Masini*, 45 Wn. App. 284, 287, 724 P.2d 1122 (1986). Patty preserved this issue for appeal.

1.1.2 There was reason to believe that the judges' impartiality could be reasonably questioned and that an impartial trial could not be had.

Patty's opening brief argued that the legal standard for recusal is whether a judge's impartiality might reasonably be called into question. Br. of App. at 18-19 (citing, *e.g.*, *Sherman v. State*, 128 Wn.2d 164, 205-06, 905 P.2d 355 (1995)). This is essentially the same standard provided in RCW 4.12.030(2) for a change of venue: "reason to believe that an impartial trial cannot be had." As Patty argued in her brief, the public comments of two Pierce County judges (including the judge assigned to Patty's case) and the internal memo distributed to all Pierce County judges and commissioners were sufficient cause that a reasonable observer knowing all the facts might reasonably question the impartiality of any judge who had received the memo. Br. of App. at 20-21.

Carlo argues that the trial court applied the correct standard because the language of the order could conceivably address both actual bias and the perception of bias. But that is not what Carlo argued to the trial court. In the hearing on Patty's motions, Carlo argues that the required standard was "she's got to provide proof of actual bias by the judicial officer hearing the case." RP, Feb. 2, 2017, at 23:21-25. In the context of the arguments made by the parties, the trial court's decision

that “the court cannot identify any bias” would seem to be adopting the “actual bias” standard encouraged by Carlo. That is the incorrect standard.

Carlo continues to press this incorrect standard when he argues Patty’s evidence was insufficient to show actual violations of the Code of Judicial Conduct, and merely alleges an appearance of bias. But as shown above and in Patty’s brief, the appearance **is** what matters here. If a reasonable person who knows and understands all of the relevant facts might reasonably question a judge’s impartiality, the judge must recuse. This would also be “reason to believe that an impartial trial cannot be had,” especially when the facts giving rise to the appearance of bias apply to all of the judges in the county.

Patty’s brief summarized “all of the relevant facts” that a reasonable person would know and understand in the objective test of whether the judges’ impartiality might reasonably be questioned. Br. of App. at 20-21. A reasonable observer knowing all these facts might reasonably question whether any of the judges could preside impartially over Patty’s case when they realized that this was the case that created the “sad situation” described in the memo and that Patty was the one who discovered the impeaching evidence that ended Kate Lee’s career.

While Patty hopes that individual judges would, in fact, be able to be impartial despite these facts, that is not the standard. It does not matter if any particular judge might be able to rise above and remain impartial. The standard relates only to the appearance of bias. A reasonable observer knowing the facts and understanding human foibles could reasonably question a judge's impartiality in this situation. That meets the standard. The trial court should have granted Patty's motion to recuse or change venue.

Carlo objects that there is no admissible evidence of the internal memo, but Patty cannot be blamed for this. Patty requested the trial court produce in evidence the internal memo that Chief Judge Martin distributed to all judges and commissioners regarding Kate Lee. CP 411, 425-26. That memo was in the exclusive possession and control of the court and could not be obtained by any other means. The fact that the trial court would not produce a copy of the memo should be held against the judges, not Patty. Any inferences about the memo should be drawn in favor of recusal.

Carlo argues that Patty should not benefit from threatening judges in her motions, but Patty's argument here does not rely on any threats or any perception of how a judge might react to the bombastic pleadings prepared for Patty by James Egan. It is enough that the comments of the judges and

the apparent content of the internal memo that the judges refused to produce for inspection create an adequate basis upon which a reasonable person could question the judges' impartiality.

The trial court abused its discretion by applying the wrong legal standard to Patty's motions to recuse and change venue. Under the correct standard, a reasonable person could question the judges' impartiality. There is reason to believe that an impartial trial could not be had. This Court should reverse the trial court's denial of these motions, vacate the final orders, disqualify all Pierce County Superior Court judicial officers who received the memo, and remand for a new trial in a new county or before an untainted visiting judge.

1.2 The trial court erred in failing to consider the \$700,000 partial inheritance distributions received by Carlo as wealth accessible to him for purposes of attorney's fees under RCW 26.09.140 and of deviation from the standard child support calculation.

Patty's opening brief argued that the trial court erred in failing to consider Carlo's partial inheritance distribution as wealth accessible to him, for purposes of an award of attorney's fees and of deviation from the standard child support calculation. Br. of App. at 24-31. As a matter of law reviewable de novo, Carlo's gratuitous and fraudulent transfer of his inheritance distributions to his mother should have been treated

as void for these two purposes. Br. of App. at 25-26. The Jimmy Johns note was not a real debt because the expectation of Carlo's mother at the time she contributed her money to the LLC was that she would recover her investment through the success of the business, not from Carlo personally. Br. of App. at 27-29. The May 2017 note was also not a real debt because at the time Carlo's mother incurred the expenses on Carlo's behalf, she had no expectation of repayment; they were gifts, not a debt. Br. of App. at 29-30.

This Court should hold that for purposes of an award of attorney's fees and of deviation from the standard child support calculation, Carlo is deemed to still possess the \$700,000 he gratuitously and fraudulently transferred to his mother. The remedy is remand to the trial court to reconsider attorney's fees and child support on the basis of Carlo's possession of \$700,000 of wealth.

Carlo's response centers around an attempt to convince the Court that his "debts" were real, but the record does not support him. A promissory note is unenforceable if it is issued without consideration. *See* RCW 62A.3-303. A gift is not consideration for a later promise to pay when the giver does not expect at the time of the gift to be compensated for the gift. *Snow v. Nellist*, 5 Wn. App. 140, 143, 486 P.2d 117 (1971).

The record reflects that Ms. Gaerlan contributed money to the LLC that owned the Jimmy Johns with an expectation that she would recover her investment through the success of the business. 6 RP 833-34, 887-89. Her contributions to Jimmy Johns without any expectation of being repaid by Carlo cannot serve as consideration for Carlo's later promise to repay her. The Jimmy Johns note was unenforceable. It was not a real debt.

The record reflects that Ms. Gaerlan paid numerous expenses for Carlo dating back to 2008, including his college education and a brand new BMW, without any expectation that Carlo would repay her. 3 RP 434, 464-69; 5 RP 769. Her gifts to Carlo given without any expectation of repayment cannot serve as consideration for Carlo's later promise to repay. The 2017 note was unenforceable. It was not a real debt.

Carlo's gratuitous transfer of the \$700,000 to his mother bears the hallmarks of a voidable, fraudulent transfer. A transfer made by a debtor is voidable as to a creditor if the debtor made the transfer with actual intent to hinder a creditor or without receiving a reasonably equivalent value in exchange, leaving the debtor unable to pay the obligation to the creditor. RCW 19.40.041 and .051. Factors that should be considered in determining whether the debtor had actual intent include whether the transfer was to an "insider," such as a close family member; the debtor retained control of the property after the

transfer; the debtor became involved in a lawsuit before the transfer; the transfer was of substantially all of the debtor's assets; the value of consideration was not reasonably equivalent to the value of the asset transferred; or the debtor was insolvent or became insolvent shortly after the transfer. RCW 19.40.041.¹

For purposes of this case, Carlo is the “debtor” and Patty is the “creditor,” because Carlo’s wealth could make him liable to Patty for an award of attorney’s fees or for increased child support. All of the factors listed above are present in this case. Carlo’s gratuitous transfer of the \$700,000 to his mother appears to have been made with actual intent to hinder Patty from receiving any benefit to which she might be entitled on account of Carlo’s wealth.

When a debtor makes a voidable transfer, multiple remedies are available to the creditor, including “avoidance of the transfer” or “any other relief the circumstances may require.” RCW 19.40.071. Here, the proper remedy for Carlo’s voidable transfer should have been for the trial court to avoid the transfer—that is, to treat it as though it had never occurred, at least for purposes of an award of attorney’s fees or an upward deviation from the standard child support calculation. The trial court erred in failing to recognize that Carlo’s transfer was

¹ The statute provides a non-exhaustive list of factors. Only the enumerated factors relevant to this case have been listed here.

voidable and in failing to treat it as such. Substantial evidence does not support a finding that Carlo had no wealth, because he gratuitously and fraudulently transferred it to his mother without receiving any value in return.

Carlo argues that “the first question” for the Court is “whether \$700,000 truly represents ‘wealth.’” The answer is “yes”! \$700,000 represents exactly \$700,000 worth of wealth. Carlo does not offer any authority to the contrary.

Carlo says the “second question” is whether his debts and expenses should be taken into consideration in determining his wealth. The answer is a conditional yes, if the debts are real. Carlo’s “debts” were not. Carlo had no legal obligation to repay his mother for her business investment in Jimmy Johns or for her various gifts to him over the years. Even though he made promissory notes, they were not supported by consideration. The “debts” were a fabrication. There is no principled reason for these phantom debts to be considered in determining the extent of Carlo’s wealth. He had \$700,000 that he did not owe to anyone. Yet he gave it away so that Patty could not benefit from it. The trial court should have avoided the transfer and treated Carlo as still possessing \$700,000 in wealth.

The principle is the same as that which animates a trial court’s authority to impute income to a parent who is voluntarily underemployed. A parent should not be permitted to

intentionally reduce their financial resources in order to avoid their obligations to their children. That is exactly what Carlo did when he transferred the \$700,000 to his mother when he had no obligation to do so. The trial court should not have permitted him to escape his obligations by hiding his wealth.

Carlo argues that Patty's argument is disingenuous, but he ignores the fact that the trial court **did consider** Patty's \$90,000 obtained in the New York divorce, even though she used it all to pay attorney's fees and to repay her father for divorce-related expenses, at the same time it **failed to consider** Carlo's \$700,000. There is no principled reason for the trial court to have treated these two amounts differently. The trial court should have considered Carlo's wealth.

Carlo's argument that his lack of a legal obligation to repay his mother is irrelevant, misses the point. There is a difference between incurring a debt and receiving a gift, namely: the expectation of repayment. At the time Carlo's mother paid for Carlo's expenses, there was no expectation that Carlo would repay. Carlo was not incurring debts to his mother. He was receiving gifts from her. His later "repayment" to his mother was itself a gift to her. The notes were not real. They were a convenient ruse to create a false justification for Carlo to get rid of the money so he could argue that he had no wealth to contribute to the children or to Patty's attorney fees.

If Carlo had received the partial inheritance years earlier and paid his own way through all of his expenses over the years, indeed he would not have had wealth at the time of trial. But that is not what happened. What happened is that Carlo's mother made an investment in a business, which she expected to recoup from the business, not from Carlo; and that Carlo's mother gratuitously paid Carlo's other expenses with no expectation of repayment, as a gift to her son. None of this justifies, as a matter of law, Carlo's gratuitous gift of his wealth to his mother in an attempt to make sure it could not be reached by Patty in either the divorce or the parenting plan action.

Carlo argues that he "received significant value" in exchange for his \$700,000. Br. of Resp. at 37. Again Carlo misses the point. He had already received the value of his mother's gifts **before** he received the inheritance. Because he had no obligation to repay his mother, **he received nothing** in exchange for giving her the \$700,000. He was not repaying a debt because there was no debt.

Carlo argues, "The question is whether Carlo had debts and whether it was reasonable to pay those debts." Br. of Resp. at 37. The answer is no. **Carlo did not have debts.** Because he had no debts, it was not reasonable for him to pay the \$700,000 to his mother. The trial court's finding to the contrary was not supported by substantial evidence. Because the "finding"

included an embedded legal conclusion as to the legitimacy of the alleged debts, this Court can review de novo and hold that Carlo's gratuitous, fraudulent transfers to his mother should have been treated as though they had not taken place, for purposes of determining attorney's fees and child support.

Because the trial court erroneously found that Carlo possessed no wealth, both the attorney fee and child support decisions were made on untenable grounds because they failed to consider Carlo's \$700,000. There was evidence presented at trial of special medical and developmental needs of the children. *E.g.*, 1 RP 48-50. The trial court made no findings regarding special financial needs because it had already determined that Carlo had no wealth from which to meet any needs. *See* 7 RP 987, 989. If this Court agrees that Carlo's \$700,000 should have been considered, remand is required so the trial court can reconsider the attorney fee and child support decisions in light of Carlo's possession of wealth.

Carlo argues that Patty should not receive an award of attorney's fees because her legal fees in the case were unreasonable. This puts the cart before the horse. The trial court never reached this question. The amount of a reasonable fee is a question that is only addressed after the court determines whether fees will be awarded at all. The size of a party's claim does not influence the decision of whether the

party is entitled to an award of fees. After a court finds a party is entitled to reasonable fees, the court has broad discretion to ensure that only a reasonable amount is actually awarded. Patty asks for a re-determination of her entitlement based on Carlo's ability to pay from the \$700,000 he fraudulently gave away. If the trial court on remand determines that Patty should have been awarded fees, the trial court can address the reasonable amount at that time.

Because Carlo's gratuitous transfer of the \$700,000 to his mother was a voidable transfer not supported by consideration, the trial court erred in concluding that Carlo had no wealth. This Court should remand for reconsideration of the attorney fee and child support determinations in light of Carlo's wealth.

1.3 The trial court abused its discretion in finding Patty guilty of contempt.

Patty's brief argued that the trial court abused its discretion in finding Patty guilty of contempt because the trial court did not properly consider whether Patty acted in bad faith. Br. of App. at 32-38. In determining whether a party has violated a parenting plan in bad faith, the court must narrowly interpret the provisions of the parenting plan and the facts must demonstrate a clear violation of the narrowly interpreted terms. Br. of App. at 32 (quoting *Graves v. Duerden*, 51 Wn. App. 642,

647, 754 P.2d 1027 (1988) and *Johnston v. Beneficial Mgmt. Corp. of Am.*, 96 Wn.2d 708, 712-13, 638 P.2d 1201 (1982)). Here, the provisions of the parenting plan are not clear. It is not possible to show a clear violation of an unclear order.

Carlo gives lip service to this mandate to narrowly interpret the parenting plan, but his arguments fail to carry it out. Carlo interprets the plan's provisions as broadly as possible so that Patty's actions might be seen as bad faith. But the provisions at issue here are not clear.

The calendar provision does not clearly express the obligations of the parties. Patty could not violate such an unclear provision in bad faith. A formal clarification from the court should have been required before a finding of contempt.

The Skype provision is self-contradictory. It requires a balancing between assistance and unmonitored contact, without clearly explaining how it should be carried out. Patty erred on the side of unmonitored contact. Had she erred on the side of assistance, Carlo would have been complaining that Patty was monitoring the calls. Patty was trying to comply with a provision that was impossible to comply with. Again, a formal clarification from the court should have been required before a finding of contempt.

The mediation provision is also not sufficiently clear to support a contempt finding. It does not clearly spell out the

amounts or proportions each party should pay. It provides no deadline for payment. Even if Patty's conduct was clear, this provision of the parenting plan was not. It is not amenable to a contempt finding without a formal clarification from the court first.

This Court should reverse the contempt order and its award of fees and penalties.

1.4 The Court should deny Carlo's request for attorney's fees.

Carlo requests attorney fees under "RCW 26.26.140," but no such statute exists. It appears that Carlo meant to refer to RCW 26.26B.060, which relates to cases under the Uniform Parentage Act. The statute states, in the context of parentage actions, "The court may order reasonable fees of experts and the child's guardian ad litem, and other costs of the action, including blood or genetic test costs, to be paid by the parties in proportions and at times determined by the court. **The court may order that all or a portion of a party's reasonable attorney's fees be paid by another party**, except that an award of attorney's fees assessed against the state or any of its agencies or representatives shall be under RCW 4.84.185." (The bold section is the language quoted in Carlo's brief.)

This is not a parentage action. The purpose of a parentage action is to determine who the parents of a child are. RCW

26.26A.400. There has never been any question that Patty and Carlo are the parents of the children. The statute on which Carlo attempts to rely simply does not apply here.

This was an action for a parenting plan arising from dissolution of marriage. It was initiated as a dissolution action. The fact that the dissolution proceedings were bifurcated does not change the nature of this action. The appropriate statute for an award of fees would be RCW 26.09.140, which applies to “any proceeding under this chapter.” However, because an award of fees under RCW 26.09.140 is based on financial need and ability to pay, Carlo would not qualify for any award. That is why he seeks to rely on a statute that does not, on its face, require a financial analysis. Because Carlo fails to establish any grounds for an award of fees, this Court should deny his request.

Carlo also argues that Patty’s appeal is frivolous under RAP 18.9. The primary inquiry under this rule is whether, when considering the record as a whole, the appeal presents no debatable issues and is so devoid of merit that there is no reasonable possibility of reversal. *Streater v. White*, 26 Wn. App. 430, 434-35, 613 P.2d 187 (1980). “In determining whether an appeal is frivolous ... we are guided by the following considerations: (1) A civil appellant has a right to appeal under RAP 2.2; (2) all doubts as to whether the appeal is frivolous should be resolved in favor of the appellant; (3) the record

should be considered as a whole; (4) an appeal that is affirmed simply because the arguments are rejected is not frivolous; (5) an appeal is frivolous if there are no debatable issues upon which reasonable minds might differ, and it is so totally devoid of merit that there was no reasonable possibility of reversal.”

Streater, 26 Wn. App. at 434-35.

Patty’s appeal is not frivolous. Even if this Court rejects Patty’s arguments and affirms, that does not make the appeal frivolous. Patty’s appeal presents issues that are at least arguable and are well-grounded in fact and law or a good-faith argument for the extension or modification of law. Any doubt as to whether the appeal is frivolous should be resolved in favor of Patty. This Court should deny Carlo’s request for an award of attorney’s fees.

2. Conclusion

The trial court abused its discretion in denying Patty’s motions to recuse or change venue. The public comments of Judges van Doorninck and Martin, combined with the memo distributed to all judicial officers regarding the outing of Kate Lee by Patty, resulted in violation of the appearance of fairness doctrine. This Court should reverse the trial court’s denial of the motions, vacate the final orders, disqualify all Pierce County Superior Court judicial officers who received the memo, and

remand for a new trial in a new county or before an untainted visiting judge.

Even if the Court finds the judges were not disqualified, the trial court erred in failing to consider Carlo's \$700,000 partial inheritance as wealth for purposes of considering attorney's fees under RCW 26.09.140 and of deviation from the standard child support calculation under RCW 26.19.075. This Court should reverse, vacate the finding that Carlo had no wealth, and remand for re-determination of attorney's fees and deviation from the standard calculation.

Additionally, the trial court abused its discretion in finding Patty in contempt. The three provisions of the parenting plan that Patty allegedly violated are not specific enough to form the basis of a contempt order. Substantial evidence does not support a finding that Patty willfully violated an unambiguous order. This Court should reverse and vacate the contempt order together with its judgment for attorney's fees, mediator fees, and civil penalties.

Respectfully submitted this 13th day of November, 2019.

/s/ Kevin Hochhalter
Kevin Hochhalter, WSBA #43124
Attorney for Appellant
kevin@olympicappeals.com
Olympic Appeals PLLC

4570 Avery Ln SE #C-217
Lacey, WA 98503
360-763-8008

Certificate of Service

I certify, under penalty of perjury under the laws of the State of Washington, that on November 13, 2019, I caused the foregoing document to be filed with the Court and served on counsel listed below by way of the Washington State Appellate Courts' Portal.

Stacy Swenhaugen
Law Office of Sophia M. Palmer
615 Commerce St Ste 101
Tacoma, WA 98402-4605
stacey@sophiampalmerlaw.com
alicia@sophiampalmerlaw.com

SIGNED at Lacey, Washington, this 13th day of November, 2019.

/s/ Kevin Hochhalter
Kevin Hochhalter, WSBA #43124
Attorney for Appellant
kevin@olympicappeals.com
Olympic Appeals PLLC
4570 Avery Ln SE #C-217
Lacey, WA 98503
360-763-8008

OLYMPIC APPEALS PLLC

November 13, 2019 - 4:41 PM

Transmittal Information

Filed with Court: Court of Appeals Division II
Appellate Court Case Number: 52604-2
Appellate Court Case Title: Patricia Bell, Appellant v. Carlo A. DiLorenzo, Respondent
Superior Court Case Number: 16-3-04479-3

The following documents have been uploaded:

- 526042_Briefs_20191113163841D2155920_0870.pdf
This File Contains:
Briefs - Appellants Reply
The Original File Name was Brief - Appellant Reply 2019-11-13.pdf

A copy of the uploaded files will be sent to:

- alicia@sophiampalmerlaw.com
- stacey@sophiampalmerlaw.com

Comments:

Sender Name: Kevin Hochhalter - Email: kevin@olympicappeals.com

Address:

4570 AVERY LN SE STE C-217

LACEY, WA, 98503-5608

Phone: 360-763-8008

Note: The Filing Id is 20191113163841D2155920