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No. 53461-4-II

COURT OF APPEALS
DIVISION II
OF THE STATE OF WASHINGTON

ERNEST EDSEL,
JUDY LAMB,

Appellant,

v.

PATRICK GILL
BARBARA BOWMAN,
DEREK LAMOUREUX
AMBERLEE D'APPOLLONIA,

Respondents.

DEFENDANT LAMOUREUX AND APPOLLANIA RESPONSE TO
APPELLANT'S BRIEF

John Daniel Groseclose,
Attorney for Defendants Lamoureux & D'Appollonia
Respondents.

G S JONES LAW GROUP, PS
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WSBA No. 29104

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COMES NOW, Defendants Lamoureux & D'Appollonia (hereafter referred to as Respondent Tenants), by and through GSJONES LAW GROUP, PS and submits the following Response.

INTRODUCTION

This case involves a disgruntled neighbor that happens to be a very experienced attorney (inactive in Washington) that is aggrieved that the City of Bremerton doesn't do more for its citizens to keep the neighborhoods secure and safe. Mr. Edsel has taken it upon himself to attempt to act when the city will not act and has alleged that the Respondent Tenants created a noise trespass, common area nuisance, breach of common area maintenance agreement, drug house marijuana grow nuisance, burning nuisance, trespass (smoke, noise and vegetation), and vegetation nuisance.

ASSIGNMENTS OF ERROR

Respondent Tenants do not allege that the trial court committed error in its decision.

FINDINGS OF FACT

The trial court made numerous findings throughout the course of the case. Mr. Edsel is an experienced attorney with 30 years of practice in Washington and Texas. CP 1533. On February 12, 2018 Mr. Edsel filed a Motion to Set Aside the Withdrawal of David Horton and Disqualify Counsel. CP 1536. On February 23, 2018 the court found that the motion was not well grounded in law or fact and

denied the motion with fees reserved and granted on May 1, 2019. CP 1536. The court found that the motion was based on pure speculation. CP 1536.

On April 18, 2018 Defendants filed a motion to compel related to discovery propounded to Mr. Edsel and on April 27, 2018 the court granted an order to compel and imposed sanctions against Mr. Edsel. CP 1534. On June 13, 2018 Defendants filed a second motion to compel and on June 22, 2018 the motion was granted with the court finding that Mr. Edsel's actions were willful, intentional and in bad faith and reserved the issue of attorney fees. CP 516-518 and CP 1534.

Of significance is that an experienced attorney is making litigation choices to not comply with the civil rules, seek discovery that is beyond the scope of the claims and increase the cost of the litigation. Mr. Edsel does not argue that the court err'd in those findings of fact.

STATEMENT OF CASE

This matter is very personal for Mr. Edsel and Respondents do not believe that he is objective; willing to rely upon facts; willing to stick to the facts and cannot prove, even when facts are viewed in the light most favorable to the Appellant, the causes of action.

PROCEDURAL HISTORY

Appellants' filed their first amended complaint on February 2, 2018. It alleges nine causes of action, which identify "Counts." Mr. Edsel filed a motion to

Amend the Complaint on May 2, 2018 to substitute himself in as the real party in interest based on an assignment he received from Ms. Lamb. CP 179-187. Mr. Edsel filed a second amended complaint on May 16, 2018 to revise the caption and clarify he was pursuing Judy Lamb's claims by assignment. CP 190-215. The Second Complaint contained the same 9 counts. CP 190-215.

FIRST PARTIAL SUMMARY JUDGMENT MOTION (2018)

The Respondent Landlords moved to dismiss three causes of action: noise trespass; common area nuisance; and breach of common area maintenance agreement on April 27, 2018. CP 130-149. The Respondent Tenants joined in the motion. The court dismissed these causes of action on May 25, 2018. CP 306-308. The court made specific findings that the three causes of action were not well grounded in law or in fact. CP 307. Additionally, the court found that the plaintiff had not timely responded to the motion for summary judgment. CP 307 and CP 302.

TIMING OF SUMMARY JUDGMENT MOTION

The Appellant argues that the response to the partial summary judgment motion was timely under CR 6 and KCLCR 7(b)(1(A). Brief of the Appellant at page 28. This argument is first raised on appeal as the appellant argued that because Respondents' styled their underlying motion as a "Partial" summary judgment motion that CR 56 and the timing of that rule was not triggered. CP 259. This is an erroneous argument as the three caused of action were sought to be completely

dismissed under CR 56 but because there were nine causes of action the motion is properly titled “partial” summary judgment. The Appellant also argued to the court that the motion was a gussied-up CR 12(b)(6) motion. CP 267. The proffered argument by Appellant that the filing of the Second Amended Complaint made the Respondent’s Motions less significant is a red herring because all nine causes of action were identical in both the First Amended Complaint and the Second Amended Complaint and the Appellant did not raise this argument to the trial court. CP 190-215 and CP 259-268.

THERE IS NO CAUSE OF ACTION FOR NOISE TRESPASS

The Respondents argument to the trial court was that each of the three causes of action (noise trespass; common area nuisance; and breach of common area maintenance agreement), when viewed in the light most favorable to the Appellant did not have a disputed material fact and were not supported by the law or the facts, in this case. CP 130-149.

To prove a claim for intentional trespass, a claimant must show (1) an invasion of property affecting an interest in exclusive possession, (2) an intentional act, (3) “reasonable foreseeability that the act would the” plaintiff’s possessory interest, and (4) “actual and substantial damages”. Bradley v. Am. Smelting & Refining Co., 104 Wn.2d 677, 692-93, 709 P.2d 782 (1985).

In distinguishing between a trespass and nuisance for Washington

Supreme Court has clearly held that where the invading substances is “transitory or quickly dissipates”, it does not matter, as a matter of law, “interfere with a property owners possessory rights and, therefore, [is] properly denominated [a] nuisance[.]” Bradley, 104 Wn.2d at 691. In contrast, “[w]hen, however, the particles or substance accumulates on a land and does not pass away, then a trespass has occurred. *Id.* Noise is not an invading substance, but, even if it were, it would transitory and not actionable in trespass. Highline Sch. Dist. No. 401, King Cty v. Port of Seattle, 87 Wn.2d 6, 18, 548 P.2d 1085 (1976). The nonmoving party must set forth specific facts evidencing the existence of an issue of fact. Schaaf v. Highfield, 127 Wn.2d 17, 21, 896 P.2d 665 (1995). Unsupported conclusory allegations are not sufficient to defeat summary judgment. *Id.* In making a responsive showing, the plaintiff cannot rely on the allegations made in its pleadings. CR56(c).

Mr. Edsel’s second declaration, even if it has been considered in response to the summary judgment motion, did not contain admissible evidence that either Respondent Tenant was the proximate cause of noise. CP 280-284. Mr. Edsel and Ms. Lamb state that the defendants, their family or friends are the cause, but do not support that with the foundation that they witnessed any specific defendant as a source. Mr. McDonald’ s declaration contemplated that it was possible for him to listen while in the Edsel residence or review decibel data from the residence, but Mr. Edsel does not proffer any explanation for not taking that step

or producing such data. CP 292, paragraph #19.

Mr. Edsel's response materials also do not identify any particular source of the purported noise/vibration. CP 280-284. There is a lack of foundation to state the source of the noise was an unlicensed motocross operated at the defendants residence. Mr. Edsel was required to provide admissible evidence that creates or demonstrated that there was a material fact in dispute.

WHAT IS NOISE?

Mr. Edsel has a lot of complaints but, never addresses why he was unable to document, measure, or record what he considered to be noise trespass.

The following definitions are contained in the Bremerton Municipal Code:

"Noise" means the intensity, duration and character of sounds from any and all sources. Bremerton Municipal Code 6.32.010 (g).

"Receiving property" means real property within which sound originating from sources outside the property is received. Bremerton Municipal Code 6.32.010 (k).

"Sound level" means a weighted sound pressure level obtained by the use of a sound level meter and weighted as specified in American National Standards Institute Specifications, Section 1.4-1971. Bremerton Municipal Code 6.32.010 (f).

"Sound level meter" means a sound-level measuring device, either Type I or Type II, as defined by American National Standards Institute Specifications, Section 1.4-1971. Bremerton Municipal Code 6.32.010 (m).

Mr. Edsel's description of noise is "loud noise" and "vibrations". CP 281, Line 16-17. Mr. Edsel and Ms. Lamb hear very "loud" and "obnoxious:" noises.

CP 281, Line 19. They feel the vibrations. Id. The noises come from motorized vehicles. CP 282;

Mr. Edsel does measure the sound. There is no impediment to Mr. Edsel standing on his property with a sound level meter and measuring the sound level. There is no impediment to Mr. Edsel, while inside his home measuring the sound level. There is no impediment to Mr. Edsel keeping a log that documents the length of time; the intensity and the character of the sound. Mr. Edsel did not provide the court with enough information, even if the cause of action existed, to prove that whatever he heard was excessive as to any other standard of measure.

The city of Bremerton has a noise ordinance. Bremerton Municipal Code 6.32.040. The same code also has standard based on decibels and time of day to assist in the enforcement of the statutes. Additionally, sounds created by motor vehicles on the road way or licensed or unlicensed motor vehicles are exempted. BMC 6.32.040(4)(i); BMC 6.32.040(4)(ii); The Washington Administrative Code at 173-82-030 states:

No person shall operate any motor vehicle or any combination of such vehicles upon any public highway under any conditions of grade, load, acceleration or deceleration in such a manner as to exceed the maximum permissible sound levels for the category of vehicle in Table I, as measured at a distance of 50 feet (15.2 meters) from the center of the lane of travel within the speed limits specified, under procedures established by the state commission on equipment in chapter 204-56 WAC, "procedures for measuring motor vehicle sound levels."

Mr. Edsel has provided no comparison to allow the trier of fact or anyone to determine what he describes noise. Additionally, there is no testimony of the actual cause or believed cause of what Mr. Edsel purports is “noise”. This cause of action against the Respondent Tenants’ is without merit.

THERE IS NO MERIT TO THE COMMON AREA NUISANCE CLAIM

The Respondent tenants live in a duplex and happen to be neighbors of Mr. Edsel. The Respondent Tenants use a driveway/alley to access the property. CP 819. The Respondents do not maintain the alley/driveway. CP 815; CP 819.

The common area that Mr. Edsel describes does not touch his property at all, is below grade and the tenants have nothing to do with the maintenance of the driveway/alley at all. There is no evidence that is offered that there is a duty, a breach of the duty or any damages to Mr. Edsel. This cause of action against the Respondent Tenants’ is without merit.

**THERE IS NO MERIT TO THE BREACH OF COMMON
AREA MAINTENANCE AGREEMENT CLAIM**

The Respondent tenants do not own the land, are not parties to any contract/covenant that runs with the land. Have no duty to any other landowners, aside from the terms of their lease, related to the common area. The common area that Mr. Edsel describes does not touch his property at all, is below grade and the tenants have nothing to do with the maintenance of the driveway/alley at all. There is no evidence that is offered that there is a duty, a breach of the duty or any

damages to Mr. Edsel. This cause of action against the Respondent Tenants' is without merit.

SECOND SUMMARY JUDGMENT MOTION (2019)

The court granted summary judgment on the remaining causes of action on March 21, 2019. CP 1279.

TIMING OF SECOND SUMMARY JUDGMENT MOTION

Again, Mr. Edsel's Response materials to the motion were not timely. CP 1281. However, the court did not strike the untimely materials. CP 1282. Mr. Edsel goes to great lengths to tell the court how much experience he has as an attorney and his decisions to not submit materials are likely tactical decisions of a willful nature.

THERE IS NO JUDICIAL ADMISSION

Mr. Edsel has alleged that Mr. Butler made a judicial admission at an oral argument. The court construes all evidence and reasonable inferences in the light most favorable to the nonmoving party. *Barber v. Bankers Life & Cas. Co.*, 81 Wn.2d 140, 142, 500 P.2d 88(1972); *Wilson v. Steinbach*, 98 Wn.2d 434, 437, 656 P.2d 1030 (1982). Stating the standard, on the record is not a judicial admission. All the respondents have questioned the veracity of Mr. Edsel, however, for the purposes of summary judgment the evidence is required to be viewed in the light most favorable to his position. This does not mean that he can rely upon things that speculative, hearsay, or conclusory, but it does mean if there

is an issue of material fact that the court would deny all or part of the motion.

**THERE IS NO MERIT TO THE DRUG HOUSE
MARIJUANA GROW NUISANCE CLAIM**

Counsel believes that Mr. Edsel believes that the next door neighbors are drug users, sellers and are operating a “drug house”. This is inferred if not expressed by Mr. Edsel. Facts that set forth no more than a declarant’s understanding of a fact without also including the specific facts upon which the understanding is based are inadmissible. Marks v. Benson, 62 Wn. App. 178, 815 P.2d 180 (1991), Conclusory allegations, which are not founded on facts, cannot be considered in a summary judgment motion. Grimwood v. Puget Sound, 110 Wn.2d 355, 753 P.2d 517 (1988).

There is no evidence that Mr. Edsel, Ms. Lamb or any of Mr. Edsel’s witnesses observed anyone buy drugs from Respondent Tenants. CP 1062-1239. Simply stating that the tenants are engaged in a marijuana grow operation is not sufficient. Ms. Lamb’s Declaration does not provide any specifics that support the notion that the tenants engage in drug house activity. CP 1079, line 10. Mr. Edsel’s declarations offers wild conjecture and speculative conclusions based on his observations. CP 1081-1088. Mr. Edsel has testified that he saw the Respondent Tenants watering and spraying marijuana plants. CP 1082, lines 9-10. Mr. Edsel believes that marijuana grows attract armed robberies, home invasions and theft. CP 1084, line 12. David Herzog speculates that the plants could be transported off site

and cultivated further. CP 1096.

Ms. D'appollonia had a Washington State Medical Marijuana Authorization form. CP 1231-1232. Ms. D'appollonia used medical marijuana and attempted to grow a few plants. CP 813. After the harvest in October of 2016 she did not attempt to cultivate a plant again. Id.

Mr. Edsel does not have evidence that supports, even with the evidence viewed in the light most favorable to him, that Respondent Tenant's were buying or selling marijuana or any other drug.

**THERE IS NO MERIT TO BURNING
NUISANCE AND TRESPASS CLAIM**

Respondent Lamoureux had a fire pit on his property. CP 820. Respondent Lamoureux engaged in using the fire pit. Id. The fire department was called and did not identify any problems. CP 819. Ms. D'Appollonia generally did not use the fire pit. CP 1231-1232. Mr. Edsel offers no evidence that he observed Ms. D'Appollonia burn anything at all.

Mr. Edsel stated that particulate matter inside his residence left a filthy film of soot for days after the fires on all his furniture, clothes and a disgusting and sickening smell or stench in the air while the smoke comes toward and inside the residence. CP 1062-1239, page 5, paragraph #11 of Mr. Edsel's declaration. There is no evidence that whatever film of soot referenced by Mr. Edsel was proximately caused by a fire from the Respondent Tenants. Similarly, there is no

evidence that if Mr. Edsel and Ms. Lamb were exposed to an airborne irritant that it was proximately caused by a fire from the Respondent Tenants. Wildfires burning in Canada with smoke drifting into Washington could also offer an explanation of airborne irritates in the south sound. In any event, Mr. Edsel did not chose to take a sample of soot or of the air and have it tested in any manner.

The unsigned declaration of Dr. Shaha that was proffered by Mr. Edsel in Response to the Respondent Tenants Motion for summary judgment was filed on March 5, 2019. CP 911-912. The actual declaration of Dr. Shaha that is signed was filed on April 17, 2019 and is dated February 26, 2019. CP 1509-1510. This declaration is edited drastically from what was proffered and even if the court had considered it, does not support cassation. Paragraph #3 has been changed from “generally accepted” to can be. CP 1510. Paragraph #4 has been changed from “would” to could. Id. Paragraph #5 has been changed to eliminate Mr. Edsel. Id. Paragraph #6 which is a causation paragraph has been struck in its entirety. Id.

THERE IS NO MERIT TO THE NOISE NUISANCE CLAIM

See previous briefing. Mr. Edsel did not provide any additional evidence after the noise trespass claim was dismissed regarding the specific source of the noise, the frequency and duration and the quality of the noise. There is no suggestion that Respondent Ms. D’Appollonia took any intentional action at all.

As to Mr. Lamoureux there is a suggestion that his vehicle was warmed up in the morning causing noise. CP 1032-1250. What is the subjective testimony

by Mr. Edsel and Ms. Lamb tell the court about the topic of noise? Noise is relative and accordingly, in order to give the court some idea of what the nuisance is there needs to be evidence that supports a measurement of the noise and a source of the noise.

**THERE IS NO MERIT TO THE
VEGETATION NUISANCE AND TRESPASS CLAIM**

The Respondent Tenants lived in their premises for years prior to Mr. Edsel and Ms. Lamb moving onto their property in 2016. CP 778-824. Ms. Lamoureux, provided both testimony and pictures that there was ivy that on the property that Mr. Edsel acquired and that the ivy spilled over into the Respondent Tenants' yard. CP 810-811. Mr. Edsel testifies that he has carefully reviewed RCW 59.18.130 to prune vegetation. CP 1062-1239, Declaration of Mr. Edsel, Page 6, paragraph #13-14.

The nuisance claim requires "substantial and unreasonable interference with the use and enjoyment of another person's property. *Grandy v/ Thurston County*, 155 Wn. 2d. 1, 6, 117 P.3d 1089 (2005). Mr. Edsel's claim requires a showing of (1) an invasion of property affecting an interest in exclusive possession, (2) and intentional act, (3) "reasonable foreseeability that the act would disturb the "plaintiff's possessory interest, and (4) actual and substantial damages". *Bradley v. Am Smelting & Refining Co.*, 104 Wn.2d 677, 692-93, 709 P.2d 782 (1985).

Mr. Edsel, Ms. Lamb, David Herzog, Mr. Estrada, and Mr. Osorio cannot

testify about the condition of the property prior to Mr. Edsel's acquisition. Mr. Edsel's claim is speculative as it concerns the source of the ivy. Additionally, Mr. Edsel does not provide any testimony concerning what intentional act that either Respondent Tenant may undertake that would make them responsible for the ivy growth. Mr. Edsel does cite a review of their lease with the Respondent Landlords. RCW 59.18 is the Residential Landlord Tenant Act and RCW 59.18.020 makes it clear that the act imposes statutory duties on the landlord and the tenant on each other. RCW 59.18.020. Mr. Edsel's reliance upon RCW 59.18.130 imposing a duty on the Respondent Tenants to Mr. Edsel and Ms. Lamb is misplaced. However, Mr. Edsel still provides no testimony concerning the affirmative actions that the Respondent Tenants took that resulted in an invasion of the property. The inferred allegation is that the tenants did not maintain the landscape. However, there is no evidence that it was reasonably foreseeable that not performing that type of landscaping would impact Mr. Edsel or that if it did impact the property that it did not occur years earlier.

Finally, Mr. Edsel has not provided any evidence that the retaining wall is damaged in any manner. He did not take samples of what he thought was ivy in a drain.

REQUEST FOR ATTORNEY FEES ON APPEAL

The Respondent requests an award of reasonable attorney fees under RAP 18.1(a).

The Respondent Tenants sought an award of attorney fees for defending the legal matter under RCW 4.84.185. CP 1426. If the court found that RCW 4.84.185 did not apply the Respondent Tenants sought an award of attorney fees related to the individual motion circumstances that had previously been reserved. Id. The motion for attorney fees delineated and apportioned time for each motion and for the defense of the case. CP 1426-1489. There were individual orders made by the court on the following dates that reserved the award of attorney fees and some of the orders made specific finding of the court: February 23, 2018; March 9, 2018; March 9, 2018; April 27, 2018 ; May 18, 2018; May 25, 2018; May 25, 2018; May 25, 2018; June 22, 2018; March 1, 2019; March 21, 2019; March 26, 2019; March 26, 2019. CP 1426-1489.

Mr. Edsel is a skilled and experienced attorney of 30 years. CP 1533, line 12-13. The court found all the claims by Mr. Edsel were dismissed on summary judgment without evidence submitted to support his claims and that the claims were frivolous and they were advanced without support by rational arguments on the law or facts established by competent evidence. CP 1533, lines 20-25.

The trial court finds blatant misrepresentation of Mr. Butler's comments by Mr. Edsel concerning the purported judicial admission. CP 1534. The court noted that Respondent Tenants had to file two motions to compel and in the second order to compel the court found that Mr. Edsel's actions were willful, intentional and in bad faith. Id. The court found that Mr. Edsel engaged in

abusive discovery practices in seeking information outside the scope of the claims asserted making the tenants seek an order of protection and seeking information beyond the discovery cut-off. CP 1434-1535.

All of the findings of the trial court, are unchallenged and should be treated as verities on appeal. In re Estate of Watlack, 88 Wn. App. 603, 609, 945 P.2d 1154 (1997). Mr. Edsel does not challenge the findings of the court. Brief of the Appellant, page 49-50. He does argue that he prevailed in equity because all the issues abated or ended in mid 2018. Brief of the Appellant, page 50. This argument is without authority or merit.

Mr. Edsel and Ms. Lanb brought a civil action. Under the authority of CR 37(d), the trial court has the authority to enter sanctions against a party. CR 37 sets forth the rules regarding sanctions when a party fails to make discovery. CR 37(d) authorizes a court to impose the sanctions in CR 37(b)(2), which range from exclusion of evidence to granting default judgment when a party fails to respond to interrogatories and requests for production. Magana v. Hyundai Motor Am, 167 Wn.2d 570, 583-584, 220 P.3d 191 (2009); See Smith v. Behr Process Corp., 113 Wash.App. 306, 324, 54 P.3d 665 (2002).”

The Magana case involved a car seat which failed. In one of the initial discovery requests Plaintiff propounded the following question which is similar to the case at the bar (ie... have there been any prior incidents) and Hyundai Motors Answered: “there have been no personal injury or fatality lawsuits or claims in

connection with or involving the seat or seat back of the Hyundai Accent model years 1995 to 1999." *Magana v. Hyundai Motors AM*, 141 Wn. App. 495 (Div II, 2007). Mr. Edsel chose to not answer some discovery and chose to not produce some discovery. Similar to the case at the bar, at no time did Mr. Edsel seek a protective order narrowing the scope of discovery. Under CR 37(d), courts treat an evasive or misleading answer as a failure to answer. A party objecting to the interrogatory or request is not relieved of a failure to respond unless the party has sought a protective order under CR 26(c). CR 37(d).

The facts set forth above show the attorney fees on various topics. Civil Rule 26 and CR 37 allow for an award of fees related to a motion to compel. The topic of attorney fees was reserved for that order. Each order in which attorney fees were reserved was based on litigation strategy of Mr. Edsel.

In any civil action, the court ... may, upon written findings by the judge that the action, counterclaim, cross-claim, third party claim, or defense was frivolous and advanced without reasonable cause, require the nonprevailing party to pay the prevailing party the reasonable expenses, including fees of attorneys, incurred in opposing such action, counterclaim, cross-claim, third party claim, or defense. RCW 4.84.185. "A frivolous action is one that cannot be supported by any rational argument on the law or facts." *Rhinehart v. Seattle Times, Inc.*, **59 Wn.App. 332, 340, 798 P.2d 1155** (1990). "The decision to make an award of attorney's fees under **RCW 4.84.185** is left to the discretion of the trial court and

CERTIFICATE OF SERVICE

I certify under penalty of perjury of the laws of the state of Washington that I served a copy of the foregoing Response of Tenants on the 6th day of September, 2019, to the following by first class mail, postage prepaid dropped in the mail on September 6th for pick up on September 6th and delivery to the following address:

Appellant

Ernest M. Edsel
307 E. 30th Street
Bremerton, WA 98310


Ginger Johnson

On September 6, 2019 I sent a copy of the Response via electronic mail to:
Shawn Butler

sbutler@helsell.com

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

DATED this 6th day of September, 2019 at Port Orchard, Washington.

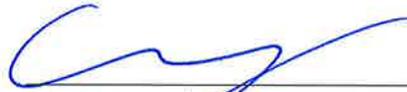

Ginger Johnson

will not be disturbed in the absence of a clear showing of abuse." *Rhinehart*, 59 Wn.App. at 339-40. A trial court abuses its discretion when its order is manifestly unreasonable or based on untenable grounds. *Wash. State Physicians Ins. Exch. & Ass'n v. Fisons Corp.*, 122 Wn.2d 299, 339, 858 P.2d 1054(1993). Under such standard, this court considers " whether the court's conclusion was the product of an exercise of discretion that was manifestly unreasonable or based on untenable grounds or reasons." *Tiger Oil Corp. v. Dep't of Licensing*, 88 Wn.App. 925, 938, 946 P.2d 1235 (1997).

CONCLUSION

For the aforementioned reasons the Court should deny Appellant's Appeal and award attorney fees to the Respondent pursuant to RAP 18.1(a).

Dated this 6th day of September, 2019.



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September 06, 2019 - 11:17 AM

Transmittal Information

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