

FILED
Court of Appeals
Division II
State of Washington
1/22/2020 9:07 AM
NO. 53499-1-II

APPEAL FROM CLARK COUNTY SUPERIOR COURT
CAUSE NO. 18-2-01598-1

IN THE COURT OF APPEALS OF THE STATE OF WASHINGTON
DIVISION II

KEITH L. NASH,

Appellant,

v.

CHUCK ATKINS, et. al.,

Respondents.

BRIEF OF RESPONDENT CLARK COUNTY, WASHINGTON

ANTHONY F. GOLIK
Prosecuting Attorney
Clark County, Washington

AMANDA MIGCHELBRINK #34223
Deputy Prosecuting Attorney
Clark County Prosecuting Attorney's Office
Civil Division
PO Box 5000
Vancouver WA 98666-5000
Tele: (360) 397-2478
Email: amanda.migchelbrink@clark.wa.gov

TABLE OF CONTENTS

	Page
A. INTRODUCTION	1
B. RESPONSE TO ASSIGNMENT OF ERRORS.....	2
1. Whether Appellant’s claims are barred by the three-year statute of limitations when he filed suit on May 9, 2018, for allegations occurring from March 22, 2015, through August 21, 2015, and Appellant failed to commence the Lawsuit by perfecting service	2
2. When the trial court’s decision to dismiss Appellant’s claims was proper, reasonable, well within the applicable law, and based on evidence submitted in the complaint, precluding reconsideration.....	2
3. Whether the trial court properly exercised discretion in denying Appellant’s other motions regarding service of the complaint.....	3
C. STATEMENT OF THE CASE.....	3
D. ARGUMENT	6
1. Standard of review	6
2. The trial court properly dismissed Appellant’s complaint because he failed to commence his lawsuit within the applicable statute of limitations	7
3. The trial court did not abuse its discretion when it denied Appellant’s motion for reconsideration of the dismissal of the complaint because he did not meet the standards of CR 59 (a)(7), (8), or (9)	11
4. The trial court correctly denied Appellant’s other motions to change the service requirements	13
E. CONCLUSION.....	16

TABLE OF AUTHORITIES

	Page(s)
Cases:	
<i>Burnett v. New York Central Railroad</i> , 380 U.S. 424 (1965).....	9
<i>Charboneau Excavating, Inc., v. Turnipseed</i> , 118 Wn. App. 358 (Div II, 2003)	14
<i>Douchette v. Bethel School Dist. No. 403</i> , 117 Wn.2d 805 (1991)	9
<i>Landstar Inway, Inc., v. Samrow</i> , 181 Wn. App. 109 (Div. II, 2014)	7
<i>Leishman v. Ogden Murphy Wallace, PLLC</i> , 451 P.3d 1101 (2019)	6
<i>Matter of the Custody of G.A.-K.K.</i> , 451 P.3d 344 (Div. III, 2019)	6
<i>McCoy v. Kent</i> , 163 Wn. App. 744 (Div. II, 2011).....	13
<i>Mills v. Meyer</i> , 40 Wn. 369 (1953).....	11
<i>Mt. Hood Stages, Inc., v. Greyhound Corp.</i> , 616 F.2d 394 (9 th Cir. 1980)	9
<i>O’Neill v. Farmers Ins. Co. of Washington</i> , 124 Wn. App. 516 (Div. I, 2014).....	7
<i>Order of R.R. Telegraphers v. Ry. Express Agency</i> , 321 U.S. 342 (1944).....	8
<i>Patrick v. DeYoung</i> , 45 Wn. App. 103 (Div. II, 1986)	16
<i>P.E. Systems, LLC, v. CPI Corp.</i> , 176 Wn.2d 198 (2012).....	6
<i>Ramey v. Knorr</i> , 130 Wn. App. 672 (Div. I, 2005)	12
<i>Weems v. North Franklin School Dist.</i> , 109 Wn. App. 767 (Div. III, 2002)	6

Statutes:

RCW 4.16.1707, 16
RCW 4.28.080 5, 8-9, 13-14
RCW 4.96.0201

Rules and Regulations:

Civil Rule 32, 7
Civil Rule 4..... 13-14
Civil Rule 6..... 15-16
Civil Rule 12.....6
Civil Rule 339
Civil Rule 59..... 2, 11-13

A. INTRODUCTION

Appellant appeals the trial court's entry of an Order of Dismissal in favor of all Respondents, each of whom work for the Clark County Sheriff's Office at the Clark County Jail. He also appeals the Court's denial of his motion for reconsideration, as well as other motions he filed relating to the service of his complaint. Appellant's claims in the underlying complaint stem from his belief that the Respondents had a legal obligation to assist him with contacting his financial institution for some sort of investigation. According to the complaint, these events occurred sometime during March 22, 2015, through August 21, 2015.

Appellant filed his complaint on May 8, 2018, under a different cause number, after the Appellant voluntarily dismissed the original complaint for failing to file a tort claim, pursuant to RCW 4.96.020. The Clark County Clerk *sua sponte* created a new action with the underlying cause number on August 2, 2018. Appellant filed a motion to request waiver of service of the summons in June, which the Court denied on June 21, 2018. Appellant then filed a few motions regarding service of his complaint, which were also denied.

The trial court granted Respondents' April, 2019, Motion to Dismiss because the Appellant had not served any of the Respondents, and

the statute of limitations ran on Appellant's claims on August 21, 2018.

The trial court did not find Appellant's arguments for equitable tolling of the statute of limitations or the 90-day service requirement persuasive.

Appellant then filed a motion for reconsideration, however, he failed to articulate any means for reconsideration, pursuant to Civil Rule 59.

Therefore, the trial court denied his motion.

Appellant failed to properly commence his lawsuit, pursuant to Civil Rule 3, during the applicable three-year statute of limitations.

Therefore, this Court should affirm the trial court's dismissal of the complaint in favor of Respondents.

B. RESPONSE TO ASSIGNMENT OF ERRORS

Respondents reject Appellant's statements of the issues and present the following in lieu thereof:

1. Whether Appellant's claims are barred by the three-year statute of limitations when he filed suit on May 9, 2018, for allegations occurring from March 22, 2015,¹ through August 21, 2015, and Appellant failed to commence the lawsuit by perfecting service.
2. Whether the trial court's decision to dismiss Appellant's claims was proper, reasonable, well within the applicable law, and based on evidence submitted in the Complaint, precluding reconsideration.

¹ Appellant's complaint states he was placed in Clark County custody on August 30, 2014, and the events that lead to the filed complaint started on March 22, 2014. CP 29. Respondents assume Appellant meant March 22, 2015, since that would have been during his incarceration and the police report number he references is 15-3317, and the first two numbers denote the year the report was made.

3. Whether the trial court properly exercised discretion in denying Appellant's other motions regarding service of the complaint.

C. STATEMENT OF THE CASE

On September 16, 2015, Appellant filed a civil rights lawsuit against a number of Clark County Sheriff's Office (CCSO) employees for events that occurred from August, 2014, through the filing of the complaint under Clark County Superior Court Cause No. 15-2-02580-9. CP 2. Appellant eventually voluntarily dismissed this lawsuit because he had failed to file a tort claim with the County. CP 155-156. He subsequently filed his tort claim, upon which the County declined to take any action. CP 170-173. After the County declined to take action on the tort claim, Appellant attempted to vacate the voluntary dismissal of the prior complaint; however, the trial court denied the motion. CP 2. Appellant then filed another complaint under the same cause number that was substantially similar to his voluntarily-dismissed complaint. CP 26-40.

After filing the new complaint, Appellant filed a motion "for process a service of summons and civil complaint waiver." CP 43-48. Appellant acknowledged the service requirements in his motion, yet asked the trial court for an order that would either allow him to serve his complaint by mail or waive the service rules altogether. *Id.* On June 22,

2018, the trial court did not take action on Appellant's motion, noting the request to waive service should be directed to the Respondents. CP 78. Appellant again filed the same motion on July 13, 2018, which the court denied. CP 84. Finally, on August 2, 2018, the County Clerk *sua sponte* assigned a new cause number to this matter, creating a separate matter for the newer complaint. CP 94.

After the complaint was given a new cause number, on September 7, 2018, Appellant filed a motion for extension of time for service of process. CP 97-101. In the motion, Appellant describes the service requirements, including the fact that the case cannot commence without proper service. *Id.* He requested an additional 60 days to properly serve Respondents and his only reasoning was because he is incarcerated and pro se. *Id.* The trial court also denied this motion.

On November, 18, 2018, Appellant sent a letter to Greg Kimsey, the Clark County Auditor, asking if Mr. Kimsey would serve the individually-named employees. CP 164. It appears that Appellant understood that he needed to individually serve the Respondents because he clearly asks Mr. Kimsey serve the Respondents for him. *Id.* Mr. Kimsey apparently declined to do so, since Appellant sent another letter to him on February 21, 2019. CP 167. Mr. Kimsey again apparently declined Appellant's request because none of the Respondents have been

served. The service statute does not require Mr. Kimsey to serve any individuals. RCW 4.28.080.

Respondents then filed a motion to dismiss Appellant's claims because they had not been served and the statute of limitations² had run on the claims against them. CP 111-114. In response, Appellant argued he had legally served Respondents because he had mailed copies of the complaint to the County Auditor on November 18, 2018, and February 21, 2019. CP 181. He also claimed he had hired an attorney to help with service. *Id.* He failed to provide evidence that either of these individuals had properly served any of the Respondents. *Id.* Appellant also argued the statute of limitations should have been equitably tolled because it was somehow the County's fault the Respondents had not been served. CP 185. The trial court granted the Respondents' motion and dismissed the matter with prejudice. CP 191-192.

Appellant then filed a motion for reconsideration on May 23, 2019, and a notice of appeal on June 20, 2019. CP 193-200; 209. The trial court denied the motion for reconsideration, finding that even if Appellant had shown equitable tolling applied, he would have had to serve the complaint

² The allegations in Appellant's complaint stem from incidents that occurred while he was incarcerated in the Clark County Jail in 2015. CP 26-39. Specifically, he claims the Respondents would not allow Appellant to use the county's phone or fax to contact his financial institution. CP 36. He claimed the Respondents were negligent and caused him emotional and mental distress. *Id.* The applicable statute of limitations for Appellant's claims is three years. RCW 4.16.080(2).

no later than August 16, 2019. CP 270. Appellant then appealed the trial court's denial of his motion for reconsideration.

D. ARGUMENT

1. Standard of review.

On appeal of a motion to dismiss pursuant to CR 12, the standard of review is de novo, and the appellate court performs the same inquiry as the trial court. *Leishman v. Ogden Murphy Wallace, PLLC*, 451 P.3d 1101, 1104 (2019). The court is to assume the allegations in plaintiff's complaint are true and may consider other hypothetical facts that are not in the record. *P.E. Systems, LLC v. CPI Corp.*, 176 Wn. 2d 198, 203, (2012). A court may grant a motion to dismiss if the record establishes the non-moving party can prove any set of facts that would entitle him to relief. *Id.* The motion to dismiss should only be granted when the plaintiff provides allegations that show on the complaint's face there is some insurmountable bar to relief. *Matter of the Custody of G.A.-K.K.*, 451 P. 3d 344, 346 (Div. III, 2019) (*internal citations omitted*).

Motions for reconsideration and other motions are reviewed for an abuse of the trial court's discretion. *Weems v. North Franklin School Dist.*, 109 Wn. App. 767, 778 (Div. III, 2002). A trial court abuses its discretion if the "decision is manifestly unreasonable or based upon

untenable grounds or reasons”. *Landstar Inway, Inc., v. Samrow*, 181 Wn. App. 109, 120 (Div. II, 2014).

2. The trial court properly dismissed Appellant’s complaint because he failed to commence his lawsuit within the applicable statute of limitations.

a) Commencement of the lawsuit.

To properly commence a lawsuit, a plaintiff must file a complaint, as well as serve it. CR 3(a); RCW 4.16.170. Where a plaintiff initially only files a lawsuit, he must serve the complaint on the defendants within 90 days of filing the lawsuit. RCW 4.16.170. Only then has the lawsuit commenced, tolling the statute of limitations and bestowing personal jurisdiction over the defendants to the trial court. *Id.* Simply filing a complaint does not constitute the commencement of the lawsuit. *O’Neill v. Farmers Ins. Co. of Washington*, 124 Wn. App. 516, 523 (Div. I, 2014). Personal service must be successfully completed within 90 days of filing the complaint to toll the statute of limitations and commence the lawsuit. *Id.*

Here, Appellant filed his complaint on May 9, 2015, and needed to serve the named Respondents no later than August 7, 2015, to commence his lawsuit and comply with RCW 4.16.170. CP 26. He has yet to serve any of the Respondents. Instead, Appellant argues, by relying on his response to the motion to dismiss, that he complied with the service rules

by serving a copy of the complaint on the Clark County Auditor, pursuant to RCW 4.28.080. CP at 179. According to Appellant, he sent a letter to Greg Kimsey, Clark County Auditor, on November 18, 2018. CP 164. In his letter, Appellant did not state he was serving Mr. Kimsey by mail, under RCW 4.28.080. Instead, he asked Mr. Kimsey to serve the Respondents and send back signed certificates of service. *Id.* Should this Court deem service of individually-named Respondents upon the County Auditor to be sufficient to meet service requirements under RCW 4.28.080, Appellant still did not meet the statutory requirements of serving the lawsuit by August 7, 2015,³ and did not timely commence the lawsuit.

b) Statute of Limitations.

“Statutes of limitation [...] are designed to promote justice by preventing surprises through the revival of claims that have been allowed to slumber until evidence has been lost, memories have faded, and witnesses have disappeared.” *Order of R.R. Telegraphers v. Ry. Express Agency*, 321 U.S. 342, 348-49 (1944). “The theory is that even if one has a just claim, it is unjust not to put the adversary on notice to defend within

³ Respondents argue service should be made, pursuant to RCW 4.28.080(16), and must be made personally upon each Respondent by leaving a copy at the house of his or her usual abode, with some person of suitable age and discretion, residing therein. The trial court considered the County as a properly-named defendant because Appellant named the individually-named defendants in their official capacity. CP 291. Although Respondents do not agree the Appellant properly named Clark County as a defendant, allowing for service, pursuant to RCW 4.28.080 (1), the result is the same. Appellant failed to timely serve any of the Respondents to commence the lawsuit.

the period of limitation and that the right to be free of stale claims in time comes to prevail over the right to prosecute them.” *Id.* “Limitations provisions are also designed to relieve the courts ‘of the burden of trying stale claims when a plaintiff has slept on his rights.’” *Mt. Hood Stages, Inc., v. Greyhound Corp.*, 616 F.2d 394, 400 (9th Cir. 1980) (quoting, *Burnett v. New York Central Railroad*, 380 U.S. 424, 428 [1965]).

For negligence claims, the applicable limitations period is three years from the date of the incident. RCW 4.16.080(2). The statute of limitations may be tolled by the trial court, if the plaintiff can prove bad faith, deception, or false assurance on the part of the named defendants in avoiding service and that he was reasonably diligent in his own efforts in initiating the action. *Douchette v. Bethel School Dist. No. 403*, 117 Wn. 2d 805 (1991). He must also show the policies underlying his negligence action outweigh the purpose of the statute of limitations. *Id.*

The statute of limitations for Appellant’s claims expired on August 21, 2018, three years after the last-dated incident in his complaint. RCW 4.16.080(2); CP 33. Appellant argues equitable tolling should apply to extend the statute of limitation because “plaintiff was not at fault for actual delays by the county [*sic*] to commence with plaintiff’s claims for damages.” CP 185. Appellant cites to no authority that would allow for equitable tolling under these circumstances. He does not present any

argument or facts that would show the Respondents acted in bad faith, were deceptive, or gave false assurances. Appellant cites to nothing to indicate Respondents did anything to thwart service of process. There is no showing of his own reasonable diligence in attempting to serve Respondents within the three-year statute of limitations period. Instead, he states he is a pro se litigant, and that the Respondents are employed by the Sheriff's Office, but does not explain why service is not possible. CP 47. Appellant fails to make any statements that Respondents are hiding or making their whereabouts unknown to thwart service. *See* CP 43-48; 97-99. Furthermore, Appellant has not presented any argument that adjudicating his negligence claim outweighs the purpose of the statute of limitations, which is to limit trying stale claims. Absent any such showing, the trial court properly found equitable tolling of the statute of limitations is not warranted.

Should this Court agree with the trial court that Clark County is a party to the lawsuit, attempted service on the County Auditor did not occur within the statute of limitations, and Appellant has not shown any bad faith or other actions Mr. Kimsey took to avoid service of process. He simply failed to timely serve any of the Respondents within the applicable statute of limitations, and cannot make any showing that equitable tolling should extend that time. The trial court properly dismissed his claims.

3. The trial court did not abuse its discretion when it denied Appellant's motion for reconsideration of the dismissal of the complaint because he did not meet the standards of CR 59 (a)(7), (8), or (9).

In his brief regarding the motion for reconsideration, Appellant states, "... claims raised were (A) whether the trial court decision constitutes an error contrary to law; and (B) whether the evidence submitted were substantial and sufficient to withstand defendant's motion to dismiss," but Appellant fails to cite to any specific subsection of CR 59(a) that the trial erred in denying that motion. Appellant's Brief at 10. In his motion for reconsideration, Appellant cited to CR 59 (a)(7) , (8) and (9). Regardless, the trial court's denial of the motion for reconsideration was not an abuse of discretion.

a) The trial court's decision was supported by the evidence presented, which justified the dismissal and the decision was not contrary to law.

Civil Rule 59 (a)(7) allows for reconsideration of a trial court decision if "there is no evidence or reasonable inference from the evidence to justify the verdict or the decision, or that it is contrary to law". CR 59(a)(7). The failure of proof is not sufficient grounds to be granted reconsideration. *Mills v. Meyer*, 40 Wn. 369 (1953). As argued above, the trial court properly dismissed Appellant's complaint based on the evidence presented and the long-standing case law applicable to the statute

of limitations and service of process. Appellant did not present any evidence to show he properly served any of the Respondents or that equitable tolling should apply. Furthermore, the case law Respondents cited in the motion to dismiss fully supports the dismissal of the complaint. Also, the trial court's decision to deny reconsideration was soundly based on the evidence presented and the applicable case law and was not an abuse of discretion. CP 290-292.

b) The trial court did not commit an error of law at a trial because a trial did not occur.

Assumedly, Appellant is claiming the trial court committed an error of law, pursuant to CR 59 (a)(8). Appellant must show there was such an error *at the trial* and he objected to the error at the time of the application to successfully move for reconsideration due to an error of law. *Ramey v. Knorr*, 130 Wn. App. 672, 686 (Div. I, 2005). Trial has not occurred in this matter. Respondents are not aware of any case law that support reconsideration on this ground when a trial has not occurred.

Should this Court determine this ground for reconsideration may be appropriate without a trial, Appellant still has failed to show an error of law occurred. As argued above, he did not serve any Respondent or the County within the applicable statute of limitations; therefore, the motion to dismiss was properly granted. The trial court did not abuse its

discretion by following the established law and denying the motion for reconsideration.

- c) **Appellant cannot show substantial justice has not occurred because the dismissal was granted pursuant to applicable law.**

Case law cautions against granting motions for reconsideration under the grounds of CR 59 (a)(9) because of the other broad grounds for relief under the rule. *McCoy v. Kent*, 163 Wn. App. 744, 769 (Div. II, 2011). Appellant did not meet the necessary burden to be granted reconsideration under the two, more specific grounds he cited in his motion for reconsideration, and he did not show substantial justice was not done. The long-standing case law was properly applied to the facts, as presented by Appellant in this matter, and the trial court properly dismissed the complaint. Substantial justice has been done, but in favor of the Respondents. The trial court did not abuse its discretion when it denied Appellant's motion for reconsideration.

4. The trial court correctly denied Appellant's other motions to change the service requirements.

- a) **Motion for alternative service.**

Appellant correctly cites the Civil Rule for service of summons and complaint as Civil Rule 4, and notes that service must be made in person, pursuant to RCW 4.28.080. *Id.* Alternatives to personal service are

allowed and may be made by publication in certain circumstances, such as when the defendant cannot be found within the state, is not a resident of the state, or is a resident of the state but has left to avoid service. CR 4 (d)(2) and (3). These same standards apply when a plaintiff wishes to serve a defendant by mail. *Id.* The civil rule does not allow for alternative service by publication or mailing solely because the plaintiff has been found to be indigent.

Although Mr. Nash did not cite to any court order that he believes was improperly denied, any denial of such a motion was proper under the law. A plaintiff who moves for service by publication must show he has made efforts to personally serve the defendants, he was reasonably diligent in doing so *and* that the defendant either left the state with the intent to avoid service or concealed himself within the state to avoid service. *Charboneau Excavating, Inc., v. Turnipseed*, 118 Wn. App. 358, 362-363 (Div. II, 2003).

Appellant's only argument that he should be permitted to serve the complaint by alternative means is that he is indigent. He claims the order the court signed granting his motion to waive the filing fee means he shouldn't have to pay a fee to serve the lawsuit either. The service statutes do not require the payment of any fee to effectuate service. See CR 4; RCW 4.28.080. Appellant does not cite to any case law that would allow

for an alternative means for service solely because the Appellant has been granted *in forma pauperis* status. The trial court's denial of any such motion was not an abuse of discretion and in accordance with applicable law.

b) Motion for extension of time to serve the complaint.

Appellant filed a motion for extension of the service deadline on September 7, 2018, a month after the 90-day service deadline had passed. CP 97-99. The trial court denied the motion.⁴ *Id.* He now argues that denial was improper.

Appellant asked for an extension of time, pursuant to CR 6(b). Appellant's Brief at 14. That rule allows the trial court to grant an enlargement of time of a civil rule if the motion is made after the expiration of the specified period and the party requesting more time can show excusable neglect. CR 6(b)(2). Appellant claimed he had "good cause" for an extension because he filed the new complaint under an old cause number and just learned that the court clerk had created a new cause number for it; however, he did not show any sort of excusable neglect. CP 99; Appellant's Brief 14-16.

⁴ Appellant again fails to cite to a court order that denied his motion or to provide that order in the clerk's papers.

Furthermore, CR 6 (b) only applies when the movant is seeking an extension of time of a civil rule that prescribes a set timeframe. CR 6 (b). The Civil Rules do not provide a specific timeframe to perfect service or commence a lawsuit. The only timeframe for service is in RCW 4.16.170, which provides a tolling period for the statute of limitations for 90 days to serve a lawsuit. A trial court does not have any authority to extend RCW 4.16.170 for good cause, under CR 6 (b), because the statute of limitations is a legislative device, not a court rule governing timing. *Patrick v. DeYoung*, 45 Wn. App. 103, 107-108 (Div. II, 1986). Furthermore, the Civil Rules only apply once the action has commenced by perfecting service; therefore, Civil Rule 6 (b) could not be used for an extension of time. *Id.*

The trial court could not grant Appellant's motion for an extension of time to properly serve Respondents; therefore, it did not abuse its discretion when it denied his motion. The trial court's ruling was in accordance with applicable case law and Appellant has not cited any other case law that would indicate otherwise.

E. CONCLUSION

In considering the facts, as presented by Appellant, the trial court properly dismissed the complaint because he failed to allege any facts that would allow for recovery of damages. He did not commence his lawsuit

within the statutorily-required 90 days, and the statute of limitation expired before he could properly serve any Respondent. The trial court also did not abuse its discretion when it denied Appellant's motion for reconsideration and other service-related motions. The trial court's rulings were well within the applicable law. Accordingly, Respondents respectfully request that the Court affirm the trial court's dismissal of the complaint and the denial of Appellant's other motions.

Respectfully submitted this 22nd day of January, 2020.

ANTHONY F. GOLIK
Prosecuting Attorney
Clark County, Washington



Amanda Migchelbrink, WSBA #34223
Deputy Prosecuting Attorney
Civil Division
PO Box 5000
Vancouver WA 98666-5000
Tele: (564) 397-2478
Email: amanda.migchelbrink@clark.wa.gov

Attorney for Respondents

CERTIFICATE OF SERVICE

I, Thelma Kremer, hereby certify that on this 22nd day of January, 2020, I electronically filed the foregoing *Brief of Respondent Clark County, Washington*, using the Washington State JIS Appellate Courts' Portal; and

On this 22nd day of January, 2020, I caused service of the foregoing *Brief* to be made on Appellant, Pro Se, by U.S. mail, postage prepaid, as follows:

Keith L. Nash
DOC# 769885
Stafford Creek Correction Center
191 Constantine Way
Aberdeen WA 98520


Thelma Kremer, Legal Secretary

CLARK COUNTY PROSECUTING ATTORNEY

January 22, 2020 - 9:07 AM

Transmittal Information

Filed with Court: Court of Appeals Division II
Appellate Court Case Number: 53499-1
Appellate Court Case Title: Keith L. Nash, Appellant v Chuck Atkins, et al, Respondents
Superior Court Case Number: 18-2-01598-1

The following documents have been uploaded:

- 534991_Briefs_20200122090522D2193962_3158.pdf
This File Contains:
Briefs - Respondents
The Original File Name was 53499-1 Nash v Atkins - Brief of Clark Cnty.pdf

A copy of the uploaded files will be sent to:

- thelma.kremer@clark.wa.gov

Comments:

Sender Name: Thelma Kremer - Email: thelma.kremer@clark.wa.gov

Filing on Behalf of: Amanda Marie Migchelbrink - Email: amanda.migchelbrink@clark.wa.gov (Alternate Email: CntyPA.GeneralDelivery@clark.wa.gov)

Address:

PO Box 5000

Vancouver, WA, 98666-5000

Phone: (360) 397-2261 EXT 4476

Note: The Filing Id is 20200122090522D2193962