

No. 53976-4-II

COURT OF APPEALS, DIVISION TWO
OF THE STATE OF WASHINGTON

AMANDA CALDERA, as personal representative of
the estate of Dawn Caldera,

Appellant

vs.

SUSAN PARSONS, a married person, et. al.,

Respondent.

APPELLANT'S REPLY

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1. Letters from Court of Appeals

1. Overview

The Supreme Court in Jones v. City of Seattle, 179 Wn.2d 322 (2014) made it clear trial courts (1) can no longer rigidly apply local rule case schedules to exclude witnesses and (2) cannot exclude witnesses over the timing of their disclosure without first meaningfully analyzing the Burnet v. Spokane Ambulance, 131 Wn.2d 484 (1997) factors in full, with findings supporting the conclusion that exclusion was the only possible remedy. Despite that, the trial court in this case did exactly that.

Given respondent's disclosure of two, new expert opinions on the day of the discovery deadline, it was error to exclude appellant's expert. It was error to deny appellant's motion for reconsideration in December 2018. And when the trial date was continued eight months to August 2019, it was error for the trial court to not account for that change of circumstance and exclude an expert that by then would have been disclosed nearly 10 months before trial took place.

There is an ample record demonstrating respondent created the situation as a matter of tactics, intending exactly this result the entire time. Albeit, this court need not find that.

Respondent protests Burnet does not matter because the trial court excluded the witness for "other reasons." That fails for three reasons. (1) There can be no "other reasons." To exclude a witness in the context

presented requires a Burnet analysis. To argue there were other reasons admits the error.¹ (2) The trial court articulated no other reasons. The original order of exclusion identified none nor did the subsequent orders. Instead, it was defense counsel who wrongly asserted in his later briefs and oral argument on subsequent motions that the court had “other reasons,” and the trial court picked up on that, repeating what defense counsel said. (3) What respondent wants this court to find as “other reasons” for exclusion are in fact exactly *the* reasons Burnet addresses. All of them deal with allegations of a late disclosure by appellant and issues regarding the case schedule. That is precisely what Burnet addresses. The other reasons are not other reasons. They are the Burnet analysis the trial court never engaged in.

To more squarely address the response brief, respondent relies exclusively on case law 20 years old, decided long before the current understanding of Burnet, to rationalize exclusion in this case and that take no account of the Supreme Court’s more recent opinion in Jones.

Respondent argues appellant did not preserve the record because there was no showing of what Doctor Chong’s testimony would have been.

¹ Arguably, witnesses might be excluded for all manner of other reasons that have nothing to do with this case. For instance, they are redundant, irrelevant, lack expertise, are protected because of privilege, etc. None of those are at issue here and it is relied this court gets the point.

If respondent is intent on to ignoring the record, appellant does not have much to say. On the original motion to exclude appellant provided a 50 page offer of proof by way of the deposition transcript of Dr. Chong. CP 241. The notion appellant did not advise the court of what his testimony would have been is false and the arguments respondent makes in reliance of that are without weight

Without intending to oversimplify the issue, not conducting a Burnet analysis was an abuse of discretion and not finding the excluded evidence was irrelevant or cumulative means the error was not harmless. The issue presented is that simple.

2. Reply To Facts

The core procedural facts should be undisputed. Yet, throughout its brief respondent certifies “this court denied (appellant’s) motion for discretionary review,” to imply this appeal is without merit. At page 2, respondent asserts this court denied the motion for discretionary review and “trial was subsequently reset for September of 2019.” That is false.

Appellant’s motion for discretionary review was filed in May 2019. (App.) It was argued July 19, 2019. (App.) Trial was *already* scheduled for August 5, 2019. (App.) And on September 5, 2019 this court “dismiss(ed) the pending motion for discretionary review as moot” *before*

deciding it, after the parties advised trial already took place (App). This is indicative of the accuracy to which respondent cites the record.

As to other facts asserted by respondent.

(1) Respondent asserts repeatedly the trial court found “a number of things” in its November 30, 2018 order supporting excluding appellant’s medical expert. (Response, p. 17, inter alia) That is objectively false. Again.

Cited in the opening brief, the Court made no findings at all. It simply granted the motion. CP 169-170. Respondent is citing words *later* used by the court on reconsideration albeit the court was simply repeating back with respondent said. That the trial court picked up on that and repeated it, incorrectly, does not make it so.²

(2) Respondent asserts it did not tactically hold onto its two experts’ opinions until the day (afternoon) of the discovery deadline. Respondent’s attorney certified the IME report was produced immediately upon its receipt and that the date of report was the "day of the examination." Response, p. 26. When argued in 2019, respondent’s counsel expounded

² Albeit, it does provide support of the need to reassign this matter to a different judicial officer. It seems as though the trial court repeated respondent’s representations to justify the exclusion without independent consideration.

orally that the dates of IME reports are always simply the date of the examination. CP 342. The court agreed. Id. ³

There was no examination. The IME report indicates it was only a “review of medical records.” CP 131. Yet, counsel has continually certified in writing to the trial court and here, and argued it to the trial court, there was an exam and the report was simply the date of it, to support exclusion.

Respondent disclosed the new opinions for the first time on the day of the discovery deadline; September 17, 2018. CP 209 (transmittal email).⁴

She already certified she had not even “retained” any experts. CP 219.

Respondent tries to work around that arguing she identified doctors much earlier in a witness disclosure with no opinions disclosed. She did. But with no opinions disclosed, appellant relied – reasonably – there were no opinions. If so, respondent was duty bound to have disclosed them timely; not hold them until the afternoon of the day of the discovery deadline.

³ Again, the trial court seemingly adopted respondent’s assertions to justify exclusion without evidence or independent consideration.

⁴ As an aside, the trial court found appellant did not give respondent proper notice by mail of her intention to preserve Dr. Chong’s trial testimony. Given the distances, both counsel had been routinely using and accepting email. Here, respondent used email to provide her new opinions on the day of the discovery deadline. That was acceptable to the trial court.

Arguably, this is not material. It changes nothing regarding the trial court's failure to conduct a Burnet analysis or the facts it should have considered if it did so. But, it is illustrative of a few issues.

First, even assuming respondent received the IME report on the day of the discovery deadline and produced it on that same day, that is irrelevant to the ultimate issue. Regardless of respondent's good or bad faith, *appellant* was faced with two *brand-new*, very extensive and lengthy medical opinions disclosed for the first time on the *day of* the discovery deadline. The only way appellant could respond would be after the discovery deadline. While this court need not find the following, plainly that was the situation "respondent" created to argue any response by appellant should be excluded as being after the discovery deadline. But even if not, it does not change the circumstance *faced by appellant in response*. That is critical because as discussed in the opening brief and below, consideration of the party's conduct (here the appellant) matters and if the Court worked the Burnet factors appropriately it should have considered the timing of respondent's disclosure.

Between pages three and four respondent argues that the order excluding Dr. Chong "was based on at least five arguments..." What respondent cannot identify are facts found by the trial after considering

Burnet. Respondent's mere arguments were of no weight then nor are they now. But for completeness, appellant will respond.

(1) Respondent argues Dr. Chong was disclosed two months late. As cited in the opening brief, an expert was disclosed one month after respondent disclosed her new opinions but due to other issues that doctor had to be switched out for Dr. Chong. None of that is material because respondent refused to take discovery or engage even as to the original expert. Even if the original expert had continued on in the case, defendant still would have stuck its toe in the sand and argued for exclusion.

(2) and (3) respondent made assertions appellant did not provide an expert report or supplement discovery responses on Dr. Chong. No report is required by the rules. It is at best inaccurate and at worse misleading to assert there was no discovery disclosure. Granted, appellant did not provide a script of Dr. Chong's anticipated testimony but general opinions were disclosed as well as identification of the medical records. CP 76 and 85. What appellant provided in disclosure was greater than what respondent did in discovery as to her experts until the day of the discovery deadline.

(4) and (5) respondent argues appellant's notice of a video perpetuation violated CR 30(8)(a) and CR 5. This is irrelevant on the exclusion of Dr. Chong *at trial*. Even if respondent was correct as to the video notice, that would only make preserving his trial testimony by

deposition invalid. It would not disqualify him from being called live at trial which appellant would have done if allowed. That was foreclosed by the trial court by his complete exclusion. Further, it is again simply false that appellant violated the civil rules regarding noting the preservation of Dr. Chong's trial testimony. It was not a video discovery deposition. Respondent was timely and appropriately noticed no differently than the parties had been providing notice throughout the case. However, as this is moot, appellant relies on her original briefing.

In regard to appellant's April 26, 2019 motion, respondent characterizes it as a motion to "overturn the prior orders." That is at best a semantical mischaracterization and at worse misstates the issue. As the pleadings demonstrate, appellant did not seek to "overturn" the prior orders. What she asked the court to do was to consider the issue of a trial date in August 2020, for a witness disclosed in October 2019.

At page 16 respondent asserts that when the trial court denied respondent's April 2019 motion, it "expressly stated that the exclusion of Dr. Chong involved more than a mere case schedule violation," and that the court "found a number of other things" supporting exclusion. The trial court never entered findings. It did not originally in November 2018. On each subsequent motion it simply parroted what respondent claimed – incorrectly – that it did.

Rather than simply admitting that, respondent tries to pull the proverbial wool over this Court's eyes arguing the trial court's first order containing a list of pleadings the parties filed on the first motion can somehow allow respondent to bootstrap the arguments it made in those pleadings, into findings by the trial court. That is a frivolous. Respondent's time would be better taking addressing the authority that applies and the facts as they are.

Respondent's concedes the trial court engaged in no Burnet analysis. It "found" nothing much less "a number of other things" as respondent asserts and simply excluded Dr. Chong without any consideration of respondent's disclosure of two brand-new opinions on the day of the discovery deadline after having certified she had no experts at all.

3. Reply To Argument

A. RESPONDENT'S AUTHORITY IS DUE NO WEIGHT

At page 18 respondent argues that exclusion of witnesses is subject to an abuse of discretion standard. That is true. However, respondent ignores it is an abuse of discretion to exclude a witness without going through the Burnet analysis. Mancini v. City of Tacoma, 188 Wn. App. 1006 (2015). Respondent acknowledges the trial court did not conduct a Burnet analysis and thus admits the trial court abused its discretion. But,

then it asks this court to ignore that because supposedly the trial court had ‘other reasons.’ That is exactly what Burnet is intended to prevent.

The trial court articulated no reasons, even if Burnet is ignored, when it excluded Doctor Chong in November 2018. It did nothing on the subsequent motions other than to repeat more or less a verbatim the incorrect statements being fed by the respondent to the effect that the court actually did make findings in November 2018.

In its brief, respondent ignores Burnet and its progeny as cited by appellant and her opening brief. Instead, respondent relies exclusively on either pre-Burnet authority, or authority very shortly after Burnet was announced and before its full impact was realized by more recent cases.

The following cases cited by respondent take no account of Burnet, Jones, or their progeny. Respondent’s arguments based on them are due no weight and require no response: (1) Lancaster v. Perry, 127 Wn.App. 826 (2005) (affirming exclusion of a witness based solely on a Local Rule case schedule – something Jones v. City of Seattle, 179 Wn.2d 322 (2013) expressly rejected at 344 and 345 explaining “local rules may not be applied in a manner inconsistent with the civil rules, and they are therefore subordinate to this court's holding in Burnet.”); (2) Stevens v. Gordon, 118 Wn.App. 43 (2003) which did not even acknowledge the existence of

Burnet. That may not have been error in 2003, but in light of Jones handed down in 2013 it clearly was when the trial court ruled in the case at bar.

B. RESPONDENT’S ARGUMENT THERE WAS NO PREJUDICE IS INCORRECT

It is agreed as a general statement that if the complaining party is not prejudiced by exclusion, a trial court’s failure to adhere to Burnet might not be reversible, despite the fact it is error. See In re Dependency of M.P., 185 Wn.App. 108, 118 (2014).

Respondent argues between pages 24 and 26 that appellant was not prejudiced because she obtained some amount of compensation at trial. That is an insufficient response given the record. Appellant has two responses.

(1) Appellant ignores In re Dependency of M.P. held that where the trial court fails to properly conduct a Burnet analysis, and does not consider whether the “excluded testimony was largely irrelevant or cumulative,” *and fails to find it is so*, as a matter of law it cannot be said exclusion is “harmless.” Id. Or said another way, when a trial court commits a “Burnet violation,” it may not be reversible *provided* the trial court *actually* considers the excluded testimony and finds it is “irrelevant or cumulative” because in that event, although erroneously excluded, it had no impact. Id. at 118. However, in the case at bar the trial court did not find

Dr. Chong's testimony was irrelevant or cumulative. That alone is enough to constitute reversible error. As Division One explained:

The admissibility of the excluded testimony was not litigated below and there is little in the record to indicate, in more than general terms, the nature of the testimony expected to be elicited from the excluded witnesses. On this record, we are unable to say the exclusion of Bramlett's witnesses was harmless.

Id.

In this case however there is a substantial record on what the "nature of the testimony expected to be elicited from the excluded witness" was. Id. Appellant provided a full deposition transcript as an offer of proof on every motion the court considered on this issue. Dr. Chong's testimony was directly relevant on plaintiff's injuries. CP 241. He explained, consistent with the medical records, that plaintiff sustained a severe closed head injury that had an enormous impact on plaintiff's vision, memory, and other cognitive functions. That testimony demonstrated both the gravity of plaintiff's general damages as well as the justification for the fairly large amount of medical bills. Given the gross verdict of \$29,000, it is clear that absent Dr. Chong's testimony, the jury adopted defendant's argument that this was only a minor soft tissue claim. This court need not find that if Dr. Chong's testimony was admitted, for a certainty the jury would have awarded more. That is not standard. It is sufficient to note that appellant

through Dr. Chong had material evidence of significant damage that was excluded and with that exclusion the jury awarded was less than the amount of the medical bills Dr. Chong testified were reasonable and necessary.

(2) In regard to respondent's argument at page 26 that "plaintiff received a favorable verdict," and therefore there was no prejudice, that ignores the evidence. First, the medical treatment damages appellant presented, and that Dr. Chong testified were necessary for the injury sustained in the motor vehicle accident and were reasonable in amount, totaled \$41,581.22. Dr. Chong's opinion was all of appellant's medical treatment between trial exhibits 28 and 38, with the exception of Exhibit 32 was "treatment related to and medically necessary for injuries and conditions subsequent to the September 25 car accident." CP 246. As to exhibit 32, which contained medical bills in the amount of \$8,723 (CP 246), they were addressed separately with Dr. Chong finding some of the charges a little high, but indicating at least "50 percent to two-thirds" of those bills were reasonable in amount and all for the accident. CP 246. Thus in total, appellant's medical specials were \$41,581.22. That is the total of trial exhibits 28 through 32, but only 50 percent of exhibit 32. That would have been Dr. Chong's testimony at trial as evidenced via the offer of proof on the December 2018 motion, and the April 2019 motion, if he was not excluded.

The jury's verdict was a general verdict and did not break out special versus general damages. However, the *total* verdict *inclusive* of all damages special and general was only \$29,000. That was \$12,581.22 less than appellant's special damages.

Thus in terms of prejudice, the jury deprived of Dr. Chong's testimony had no evidence as to the full scope of the reasonableness of appellant's \$41,581 of medical charges and the general verdict being only \$29,000 there can be no dispute but that the jury did not award even the medical bills plaintiff's evidence would have proved she was entitled to.

C. RESPONDENT'S ARGUMENT IT DID NOT CONCEAL ITS EXPERT WITNESSES DOES NOT BEAR SCRUTINY

At page 27, in one paragraph, respondent argues she did not conceal her expert witnesses until the discovery cut off.

Respondent argues this issue is a red herring. A red herring is something that does not matter. If she withheld her experts' opinions until the last day of the discovery deadline, that matters. Albeit, it may indeed be a red herring as to whether respondent did so with malice. Whether unintentional or intentional, it does not change the fact that respondent disclosed two brand-new, lengthy, and detailed expert opinions on the afternoon of the day of the discovery deadline. Whether or not that was intentional does not change the position appellant was put in.

Second, the only reason offered by respondent for the timing was that “both experts dated the reports on the day of the examination - not the date the finalized report was delivered to counsel for defendant.” See Respondent’s brief, p. 27. However, as identified above there was no examination. The only reason offered for the timing is objectively false. Further, respondent never produced evidence that the day the report was produced was the day it was received by respondent. Given the amount of time between the date of the report and its later production, it strains credulity for respondent to expect any court, without some measure of actual evidence, to believe she just coincidentally received a report on the day of the deadline.

Third, none of that addresses the fact that respondent and her counsel certified they had no experts. At all. Not that they had consulting experts that would not be disclosed, *that there were no experts*. Thus, while respondent clings to the reed that much it identified the names of two experts with no disclosure of any opinion whatsoever, it ignores they certified they had none and never supplemented that disclosure until disclosing the two new opinions until the day of the deadline. Parties disclose all manner of witnesses in discovery only to decide not to use them. That is particularly true of experts. It was reasonable for appellant to rely that given the failure of respondent to provide opinions, that she was not

going to utilize them. Then, they surprised appellant with the two new opinions on the day of the discovery deadline.

D. REMAND TO A DIFFERENT JUDGE

Appellant sufficiently outlined the basis for her request for remand to a different judge. Respondent says little other than to misstate the record arguing appellant should not be surprised her motions were denied. For the reasons identified in the opening brief, it is reasonable to remand to a different judge.

E. RESPONDENT’S “SATISFACTION OF JUDGMENT”

Respondent at page 26, and at other places in its brief, implies appellant entered a satisfaction of judgment. She did not. Respondent deposited the judgment amount with the clerk of the court. CP 642. Then, respondent ex parte presented a satisfaction of judgment to the clerk who signed it as the clerk. CP 643-644. Appellant did not file a satisfaction of judgment. That is material as there is authority that a party who accepts payment of a judgment might waive their right of appeal. Appellant has no ability to stop respondent paying into the registry of the court the judgment amount, nor to stop the clerk from entering what it did. That does not make the judgment “satisfied” in the eyes of the appellant nor does it moot this appeal.

4. Conclusion

That a trial court in this day and age, after Jones and the myriad of cases on this issue to say nothing of this court's opinion in Mancini v. City of Tacoma, 188 Wn. App. 1006 (2015), the same Division where this case was tried, would exclude a witness based on a complaint of the timing of the witness's disclosure – without conducting a Burnet analysis, is somewhat perplexing. Here, appellant briefed Burnet, Jones, and Mancini in great detail – and challenged the trial court very directly for its refusal to work a Burnet analysis.

For reasons that remain unclear to appellant, the trial court simply went along with respondent's incorrect assertions the court entered findings that supposedly articulated all manner of "reasons" for the exclusion. Here, as respondent did below, raises all of the same issues while continuing to ignore Burnet.

The trial court's failure undertake a Burnet analysis when it originally excluded Dr. Chong was an abuse of discretion under existing case law. That the trial court also did not consider Dr. Chong's proffered testimony and find it irrelevant or redundant, by operation of case law, means that it was not. With an abuse of discretion in the exclusion of evidence that was relevant and not redundant, reversal is required. In that regard, this Court should not simply remand for findings. Exclusion was not

supported by the record originally and certainly not when trial was continued for eight months. Orders must be supportable *when entered*.

DATED this 29th day of June, 2020.

McGAUGHEY BRIDGES DUNLAP, PLLC



By:

Dan'L W. Bridges, WSBA 24179
Attorney for appellant



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General Orders, Calendar Dates, and General Information at <http://www.courts.wa.gov/courts> **OFFICE HOURS: 9-12, 1-4**

June 3, 2019

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CASE #: 53356-1-II

Amanda Caldera, Petitioner v. Susan Parsons, et al., Respondents

Counsel:

In accordance with the court's general order 05-1, effective May 9, 2005, a Commissioner has determined that the motion for discretionary review, filed and served May 30, 2019, will be heard on the **oral argument** motion calendar on **July 17, 2019**, at **1:30 p.m.** A response to the motion must be filed no later than **June 14, 2019**.

Attendance at oral argument is mandatory unless counsel notifies the court and other party/parties **before noon on the Monday** in advance of the scheduled argument date of counsel's intention to waive his or her presence. ***Counsel must waive oral argument independently.* **The court will impose a \$150.00 sanction for failure to appear without providing the required notification.**

The court commissioners encourage litigants to be mindful of opportunities for young lawyers (i.e., lawyers practicing for less than five years) to appear at oral argument before the commissioners, particularly for motions where the young lawyers drafted or contributed significantly to the underlying motion or response. This court is amenable to permitting up to 2 lawyers to argue for a party if this creates an opportunity for a junior lawyer to participate. If a request is made at least 48 hours in advance of the argument date, this court will consider granting a few minutes of additional argument time to allow a party to split its argument in order to include a junior attorney. If this happens, the opposing party's time will be also be extended.

Very truly yours,

Derek M. Byrne
Court Clerk

DMB:C



Washington State Court of Appeals Division Two

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General Orders, Calendar Dates, and General Information at <http://www.courts.wa.gov/courts> **OFFICE HOURS:** 9-12, 1-4.

August 21, 2019

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CASE #: 53356-1-II

Amanda Caldera, Petitioner v. Susan Parsons, et al., Respondents

Counsel:

On the above date, this court entered the following notation ruling:

A RULING BY COMMISSIONER BEARSE:

This court requests an update from the parties as to whether a trial occurred and whether the pending motion for discretionary review is moot. Letter-responses are requested by August 30, 2019.

Very truly yours,

Derek M. Byrne
Court Clerk

IN THE COURT OF APPEALS OF THE STATE OF WASHINGTON

DIVISION II

FILED
COURT OF APPEALS
DIVISION II

2019 SEP -5 PM 1:01

STATE OF WASHINGTON
BY 
DEPUTY

AMANDA CALDERA, as personal
representative of the estate of Dawn
Caldera,

Petitioner,

v.

SUSAN PARSONS, a married person,
et al.,

Respondent,

No. 53356-1-II

RULING DISMISSING
MOTION FOR
DISCRETIONARY REVIEW

Based on the responses to this court's recent inquiry, this court dismisses the pending motion for discretionary review as moot. No attorney fees or costs are awarded.

IT IS SO ORDERED.

DATED this 5th day of September, 2019.



Aurora Bearse
Court Commissioner

cc: Dan'L W. Bridges
Douglas F. Foley
Hon. Suzan Clark

MCGAUGHEY BRIDGES DUNLAP PLLC

June 29, 2020 - 4:24 PM

Transmittal Information

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