

**FILED**

OCT 04 2011

COURT OF APPEALS  
DIVISION III  
STATE OF WASHINGTON  
By \_\_\_\_\_

**No. 298469**

**COURT OF APPEALS  
DIVISION III  
OF THE STATE OF WASHINGTON**

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**ESTATE OF VANCE BROWNFIELD,  
through its personal representative, LESLIE SCHNEITER,**

**Appellant,**

**v.**

**BANK OF AMERICA, N.A., a national banking association;  
KAREN RHODES, an individual, and the marital community  
of KAREN RHODES and JOE DOE RHODES,**

**Respondents.**

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**BRIEF OF RESPONDENT, KAREN RHODES.**

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THOMAS F. WEBSTER, WSBA #37325  
Attorney for Respondent, Karen Rhodes.

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## **I. INTRODUCTION**

Respondent/Defendant, Karen Rhodes submits the Brief of Respondent in answer to Appellant/Plaintiff, The Estate of Vance Brownfield's Opening Brief. The Respondent/Defendant Karen Rhodes does hereby join in the introduction and facts as submitted by Respondent/Defendant Bank of America in their own responsive brief.

## **II. RESPONDENT'S STATEMENT OF THE CASE.**

Respondent/Defendant Karen Rhodes joins in Respondent/Defendant Bank of America's Statement of the Case.

## **III. STANDARD OF REVIEW**

This case involves review of the trial court's ruling of two summary judgment motions. Thus, the standard of review is de novo. *Ranger Ins. Co. v. Pierce County*, 164 Wn.2d 545, 552, 192 P.3d 886 (2008).

## **IV. ARGUMENT**

Respondent/Defendant Karen Rhodes joins in Respondent/Defendant Bank of America's Authorities and Argument.

**V. CONCLUSION**

Respondent/Defendant Karen Rhodes joins in  
Respondent/Defendant Bank of America's Argument, and does  
hereby request the opportunity to present oral argument.

**RESPECTFULLY SUBMITTED** this 3<sup>rd</sup> day of October, 2011.

WEBSTER LAW OFFICE, PLLC

By:   
\_\_\_\_\_  
THOMAS F. WEBSTER, WSBA #37325  
Attorney for Defendant, Karen Rhodes

**CERTIFICATE OF SERVICE**

I declare under penalty of perjury under the laws of the State of Washington that on this date true and correct copies of the document to which this declaration/certificate of service is attached were served by the method indicated below, and addressed to the following:

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BARB LI'L-JON