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

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Darrell Riste, Cathy Riste and Tyler Riste,

Appellant(s)/Plaintiff(s)

v.

The Personal Representative of the Estate of Dan McAnally, The Trustee  
of the Riste Trust, Baker Boyer Bank, The Vice President of Baker Boyer  
Bank, Alan M. Dillman, Velikanje, Moore & Shore, Attorneys at law,  
Stokes Lawrence, Velikanje Moore & Shore, Stokes Lawrence, P.S.,  
George Velikanje, and Does 1-30

Appellee(s)/Defendant(s)

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**APPELLANT'S REPLY BRIEF**

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## I. INTRODUCTION

Appellant(s)/Plaintiff(s) Opening Brief contained references within the Statement of the Case to the Fact(s) which were necessary for review of the errors alleged by the Plaintiff(s). (AOB 4-5) An extensive resuscitation of the facts which were at issue in the Probate Matter and the instant matter was not necessary. Since the Superior Court's Order was devoid of any reference to any facts/legal arguments within the pleadings it was not possible for Plaintiff(s) to refer to any specific fact(s)/legal argument(s) which the Superior Court erroneously relied upon because there is no indication in the Superior Court's Order on what basis it made its decision. (CP 2343-2344) Plaintiff(s) were forced to refer to the Record generally without specific reference to pages of the record because of the manner in which the Superior Court made its blanket Order. (*Id.*) Furthermore, citation could not be made to the Record to prove a negative; no citation to the Record could possibly have been made to prove that the Court incorrectly interpreted any specific fact/argument because the Court's Order does not clearly indicate which if any fact/argument it relied upon. (*Id.*) The Appellee(s)/Defendant(s) further assertion that Plaintiff(s) have not provided appropriate citation to the legal arguments made within the Appellant(s) Opening Brief is ridiculous and totally erroneous. (ARB 9-20) The Appellant(s) Opening Brief did not request and/or require this Court to review the substance of any legal or factual finding(s) made in the Probate Matter as inappropriately argued extensively by the Defendant(s) within their Responsive Brief. (ARB 5, 9-20) The issues for review by this Court were set forth with particularity within the Appellant(s) Opening Brief and they are the same arguments which were made within

their Pleadings below; they are that Collateral Estoppel was inapplicable and that Collateral Estoppel was erroneously applied to preclude both the Pre Administration claims against the “Attorney Defendant(s)” and the claims against all of the defendant’s for acts they committed during Administration. (AOB 6-7, CP 2343-2344) Plaintiff(s) also clearly set forth that they are appealing the Court’s finding that claims against the “Attorney Defendants” were barred as a matter of law. (AOB 6-7, CP 2343-2344)

## II. ARGUMENT

### A) PLAINTIFF(S) APPROPRIATELY CITED TO ONLY THE ESSENTIAL FACTS AND/OR APPLICABLE LEGAL AUTHORITIES WITHIN THEIR OPENING BRIEF

Appellant(s) citations in their Opening Brief to the legal arguments raised in the Superior Court are not barred by RAP 10.3(a)(6) as alleged by the Defendant(s). (ARB 13) There is no requirement to raise new or additional arguments on Appeal, simply alleging an error in application of the legal authorities and/or erroneous determination(s) of the facts and citation thereto is all that is required. (*Id.*) The Superior Court’s Order failed to set forth its determination of any facts and/or its interpretation/application of any of the legal authorities and it was therefore impossible to determine what facts were erroneously relied upon and/or what legal authorities were erroneously applied; hence, Plaintiff(s) cited to the facts and/or arguments raised below without literally regurgitating them in their Opening Brief. (AOB 7-10) Furthermore, the Superior Court’s cursory order which failed to set forth any determination of fact or application/interpretation of the legal authorities forced

Plaintiff(s) to request and necessarily will require this Court to remand for further explanation or to review De Novo,

This matter arises out of the probate of the Estate of Dan McAnally. The allegations set forth by the Plaintiffs, who were all beneficiaries in one way or another of the McAnally Estate, were the subject of litigation during the probate proceedings in Yakima County Cause 12-4-00514-8. The present plaintiffs were parties to those proceedings, which concluded with the entry of Findings of Fact and Conclusions of Law on January 26, 2016. These Findings and Conclusions are adverse to the present plaintiffs and are contrary to the factual assertions they make in the present lawsuit. Consequently, the claims set forth in the instant matter, having been previously decided in a different, but substantially similar lawsuit, are barred by the principles of issue preclusion. Additionally, the plaintiffs' legal malpractice claims against Mr. Velikanje and the two law firms are additionally barred as a matter of law. Mr. Velikanje, as attorney for the personal representative of the estate, owed no duty to the plaintiffs.

(CP 2343-2344, See AOB 7-8) As such, it was not possible for Plaintiff(s) to pinpoint to the facts relied upon by the Superior Court or to pinpoint cite to a single evidentiary fact relied upon by the Plaintiff(s) below which was erroneously disregarded because it is not clear from the Superior Court's Order on what facts/arguments the Court based its decision. (Id.) Plaintiff(s) references verbatim to the argument(s) and facts as argued below was the only option for bringing these errors to the attention of this Court for remand or De Novo review. (AOB 7-8)

Furthermore, the Defendant(s) are incorrect, the Plaintiff(s) correctly and appropriately utilized "Id." as a citation within their Opening Brief. (ARB 13-14) The citations to "Id" which were utilized by the Plaintiff(s) do in fact prove the legal points raised by the Appellant(s) within their Opening Brief as Plaintiff(s) indicated within the Opening

Brief. (ARB 13-14)

Likewise, there is no ambiguity in the Appellant(s) Opening Brief as to the issues being raised on Appeal. (AOB 6-7) The Defendant(s) argument to the contrary is a deceitful attempt to erroneously convince this Court that the Pre Administration claims which were being made only against the “Attorney Defendants” (AOB 15-19) who drafted the Will/Riste Trust are identical to the claims which were also being made against the PR/Trustee and their Attorney(s) for acts committed during administration (those claims were at issue in the probate matter). (AOB 13-25, ARB 15-19) The Superior Court’s finding that the claims against the attorney for the PR were barred as a matter of law because there was no duty owed by the attorney for the PR to the beneficiaries of an Estate is completely off the mark! (ARB 12-15, AOB 20-25, CP 2343) Appellant(s) never claimed that the attorney for the PR owed a duty to the beneficiaries of the Estate anywhere within their pleadings below. (AOB 20-25) The Defendant(s) admitted in their Pleadings below that the attorney for the Decedent who drafted the Will/Riste (The “Attorney Defendant(s)”) did in fact owe a duty to the beneficiaries of the Will/Riste Trust; arguing only that Plaintiff(s) claim(s) were barred by Collateral Estoppel. (CP 2253-2254) Appellant(s) Opening Brief clearly indicates that the pre administration claims are separate and distinctive from the claims made during administration and it is the Superior Court and the Defendant(s) who have commingled the issues. (AOB 8, 15) Of course Appellant(s) Cathy Riste and Tyler Riste are also appealing the application of collateral estoppel against them in toto based on the Probate Matter to which they were not a party or in privity. (AOB 8-10)

**B) ISSUES RAISED IN DEFENDANT(S) RESPONSIVE BRIEF REGARDING COLLATERAL ESTOPPEL**

**i) PLAINTIFF(S) RAISED CLAIMS OF ERRORS ON APPEAL FOR THE SUPERIOR COURT'S PRECLUSION OF CLAIMS WHICH OCCURRED DURING ADMINISTRATION BECAUSE THE DEFENDANT(S) FAILED TO PROVE EACH REQUIRED ELEMENT OF COLLATERAL ESTOPPEL AND/OR BECAUSE THE SUPERIOR COURT ERRONEOUSLY INTERPRETED/APPLIED COLLATERAL ESTOPPEL; THERE WAS NO COLLATERAL ATTACK ON THE PROBATE PROCEEDINGS AS ALLEGED BY THE DEFENDANT(S) WITHIN THEIR RESPONSIVE BRIEF**

The Defendant(s) Responsive Brief inappropriately argues that the Probate Court's Ruling cannot be collaterally attacked (ARB 16-17), however, Plaintiff(s) Appeal does not collaterally attack the Probate Court proceedings. (AOB 8-15) Plaintiff(s) Opening Brief raises the issue of whether collateral Estoppel was lawfully applied to bar all claims which arose during the administration of the Estate/Riste Trust and/or whether the Defendant(s) met their burden of proof on each of the required elements of Collateral Estoppel. (AOB 8-15) Accordingly, the Defendant(s) argument(s) at pages 16-17 is/are misplaced and should be disregarded by this Court. The Defendant(s) failure to raise these arguments in the Superior Court also precludes consideration by this Court, "...failure to raise this issue below precludes appellate review..." ((*State v. Harrington*, 56 Wn. App. 176, 181 (1989), citing, *State v. Warren*, 55 Wn. App. 645, 649-50 (1989); *State v. Branch*, 129 Wn.2d 635 (1996); RAP 2.5(a))

**ii) NEITHER CATHY RISTE NOR TYLER RISTE WERE "PARTIES" IN THE PROBATE PROCEEDINGS CONTRARY TO THE DEFENDANT(S) ARGUMENTS AT PAGE 21 OF THEIR RESPONSIVE BRIEF**

The Defendant(s) argument within their Responsive Brief at page 21 which argued that Cathy Riste and Tyler Riste were “Parties” to the Probate Removal Petition simply repeats the arguments they made in the Superior Court which did not rely on any evidence which was legally sufficient to prove that either Cathy Riste or Tyler Riste was a “Party” to the Probate Removal Petition. (AOB 8-10, ARB 21, CP 385, 2252-2256, CP 2343-2344) The Superior Court’s finding that both Cathy Riste and Tyler Riste were “Parties” in the Probate matter is not supported by the evidence and/or is an abuse of discretion. (Id.)

**iii) NEITHER CATHY RISTE NOR TYLER RISTE WERE “IN PRIVITY” WITH DARRELL RISTE IN THE PROBATE PROCEEDINGS NOR WERE THEY VIRTUALLY REPRESENTED CONTRARY TO THE DEFENDANT(S) ARGUMENTS AT PAGES 21-25 OF THEIR RESPONSIVE BRIEF WHICH ARE UNLAWFULLY RAISED FOR THE FIRST TIME ON APPEAL**

The Defendant(s) Responsive Brief raises the arguments of “Privity” and/or “Virtual Representation” which were not raised by the Defendant(s) below and these arguments are therefore waived by operation of law, “...failure to raise this issue below precludes appellate review...” ((*State v. Harrington*, 56 Wn. App. 176, 181 (1989), citing, *State v. Warren*, 55 Wn. App. 645, 649-50 (1989); *State v. Branch*, 129 Wn.2d 635 (1996); RAP 2.5(a)); see, AOB 8-10, ARB 21-25, CP 2252-2256) Furthermore, the Superior Court’s Order did not make any finding of “Privity” and/or “Virtual Representation” and instead found only that Cathy Riste and/or Tyler Riste were “Parties” thereby precluding affirmation on the basis of “Privity” and/or “Virtual Representation”. (Id.)

Even if this Court does consider the Defendant(s) arguments for

“Privity” and/or “Virtual Representation” they do not correctly apply the elements thereof to the facts in this matter and/or the facts do not support a finding of “Privity” or “Virtual Representation”. (AOB 8-10, ARB 21-25, CP 2252-2256) As stated in Appellant(s) Opening Brief, Cathy Riste and Tyler Riste’s did not “Participate” in the probate matter and their interests were opposed to Darrell Riste’s interests because Darrell Riste sought invalidation of the Riste Trust and thereby elimination of all of Cathy Riste and/or Tyler Riste’s future interests as beneficiaries of the Riste Trust. (AOB 8-10) Defendant(s) raise the argument for the first time on Appeal (ARB 21-25) that if the Riste Trust was found invalid, then none of the Riste’s would take the assets that were otherwise gifted to the Riste Trust because the gift would lapse. (ARB 24-25) The Defendant(s) entire argument is misplaced because Darrell Riste would receive any and all real or personal property owned by the Estate after invalidation of the gift to the Riste Trust under the Section 4.2.1 of the Will. (CP 212)

**iii) APPLICATION OF COLLATERAL ESTOPPEL IS UNJUST  
CONTRARY TO THE DEFENDANT(S) ARGUMENTS TO THE  
CONTRARY WHICH ARE UNLAWFULLY RAISED ON APPEAL  
FOR THE FIRST TIME**

Defendant(s) failed to raise any argument in the superior court regarding the “injustice” element of Collateral Estoppel and should not be permitted to raise these arguments for the first time on appeal, These arguments were not made below within the Defendant(s) pleadings and are waived by operation of law, “...failure to raise this issue below precludes appellate review...” ((*State v. Harrington*, 56 Wn. App. 176, 181 (1989), citing, *State v. Warren*, 55 Wn. App. 645, 649-50 (1989); *State v. Branch*,

129 Wn.2d 635 (1996); RAP 2.5(a)); see, ARB 26-31, AOB 10-15, CP 2169- 2175, 2252-2256) Furthermore, the Superior Court’s Order did not make any finding regarding the “injustice” element of Collateral Estoppel and this Court should either remand or decide this matter De Novo. (CP 2252-2256)

Even if this Court does consider the Defendant(s) arguments they still have failed to proven in accordance with the applicable burden of proof that an injustice will not result. (AOB 6, CP 718-719, 722-723) Contrary to the Defendant(s) argument (ARB 26-27) it was not the Plaintiff(s) burden to show that the burden of proof in the probate matter was equal to or more stringent than that applicable in the civil matter it was the Defendant(s) burden to prove that the burden of proof was identical in order to prove that there was no injustice. (AOB 6, CP 718-719, 722-723)

Likewise, the Defendant(s) arguments that the disparity of relief available between the two proceedings did not result in an injustice is unlawfully raised for the first time on appeal (see above), it is also misplaced, again relying on the incorrect assumption that the only acts which could have caused damages were the acts committed by the PR/Trustee and their attorney during administration. (ARB 28) The acts of the “Attorney Defendants” prior to administration and the damages that those acts caused were not raised, argued or decided in the probate matter and cannot therefore be Collaterally Estopped. (AOB 18-19, CP 721-722)

**C) CLAIMS BARRED AS A MATTER OF LAW**

**i) PLAINTIFF(S) RAISED CLAIMS OF ERRORS ON APPEAL**

**FOR THE SUPERIOR COURT’S FINDING THAT ALL CLAIMS  
AGAINST THE “ATTORNEY DEFENDANT(S)” FOR ACTS  
COMMITTED PRIOR TO ADMINISTRATION WERE BARRED  
AS A MATTER OF LAW**

The Defendant(s) Responsive Brief like the Superior Court’s Order inappropriately argued/found that the Plaintiff(s) made claims against the attorney for the PR and that those claims were barred as a matter of law. (ARB 32-36, CP 2312) Plaintiff(s) never raised below in the Superior Court or argued in their Opening Brief any claim against the attorney for the PR of the Estate in which they claimed that a duty was owed directly to the beneficiaries of the Estate. (AOB 15-20, CP 721-722) The Plaintiff(s) argument and claim of error was that the attorney for the Decedent/Trustor owed a duty to the beneficiaries of the Will/Riste Trust because he drafted the Will/Riste Trust and that the Will/Riste Trust was specifically drafted with an intent to benefit the beneficiaries of the Will/Riste Trust.(AOB 15-20, CP 721-722) The Plaintiff(s) appropriately cited to case authority which was directly on point contrary to the Defendant(s) arguments within their Responsive Brief. (Id., see also, ARB 32-36) The Plaintiff(s) Pre-Administration Claims against the “Attorney Defendant(s)” for their negligent drafting of the Will/Riste Trust is not barred as a matter of law. (AOB 15-20, CP 721-722) Defendant(s) arguments within their Responsive Brief at pages 32-36 in addition to being irrelevant are unlawfully raised for the first time on appeal and should be disregarded entirely by this Court, These arguments were not made below within the Defendant(s) pleadings and are waived by operation of law, “...failure to raise this issue below precludes appellate review...” ((*State v. Harrington*, 56 Wn. App. 176, 181 (1989), citing, *State v. Warren*, 55 Wn. App. 645, 649-50 (1989); *State v. Branch*, 129 Wn.2d 635 (1996); RAP 2.5(a))

Plaintiff(s) are appealing the Superior Court's determination that their claims against the "Attorney Defendants" for acts they committed prior to probate administration were barred as a matter of law when they were the Attorney for the Decedent/Trustor, Dan McAnally, not while representing the PR after the death of Dan McAnally. (AOB 15-20, CP 3-7, 721-722, 2312) The Plaintiff(s) never raised below in the Superior Court or within their Opening Brief any claim or any claim of error for any acts committed by the attorney for the PR in which they claimed that the attorney for the PR owed a duty directly to the beneficiaries of the Estate and the Superior Court's Order is erroneous. (AOB 15-20 CP 3-7, 721-722, 2312) Accordingly, the Court's order erroneously found that the Plaintiff(s) claims against the "Attorney Defendant(s)" were barred as a matter of law,

...the plaintiffs' legal malpractice claims against Mr. Velikanje and the two law firms are additionally barred as a matter of law. Mr. Velikanje, as attorney for the personal representative of the estate, owed no duty to the plaintiffs.

(CP 2343-2344)

Furthermore, the Defendant(s) failed to present any opposition to the Appellant(s) claims of errors by the Superior Court in barring all of their Pre-Administration claims against the "Attorney Defendant(s)" for acts committed prior to administration while representing the Decedent/Trustor not the PR. (AOB 15-20 CP 3-7, 721-722, 2312) The Defendant(s) Pleadings below and their Responsive Brief erroneously argued a point of law which was not in issue. (ARB 32-36, CP 2312) This Court should decide De Novo that the claims against the "Attorney Defendant(s)" for acts committed prior to administration are not barred as

a matter of law as set forth within Appellant(s) arguments below (CP 3-7, 721-722) and within their Opening Brief (AOB 15-20) and remand to the Superior Court to allow Plaintiff(s) Complaint to proceed on these claims.

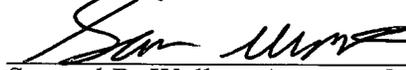
### **III. CONCLUSION**

Plaintiff(s) Pre administration claims against the “Attorney Defendant(s)” were not barred as a matter of law because the attorney for the Decedent/Trustor (The “Attorney Defendant(s)”) owed a duty to the beneficiaries of the Will/Riste Trust as set forth by the Washington Supreme Court. Plaintiff(s) never argued below or within their Opening Brief that the attorney for the PR owed a duty directly to the beneficiaries of the Estate and both the Defendant(s) argument and the Superior Court’s finding that such a duty was barred as a matter of law is not on point and/or is irrelevant.

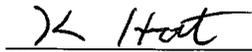
Several of the Defendant(s) arguments were raised for the first time on Appeal should be disregarded entirely by this Court. (See above) Those arguments included the argument raised by the Defendant(s) that there was no “injustice” under Collateral Estoppel. Specifically, the Defendant(s) argued that Plaintiff(s) failed to prove that there was “injustice” but they fail to realize that it was not Plaintiff(s) burden to prove that there was an “injustice” rather it was the Defendant(s) burden to prove that there was no “injustice”. Likewise, the Defendant(s) argument that there was no disparity of relief in addition to being waived is irrelevant because it is based upon the false premise that the only damages claimed in the instant matter were for acts committed during administration. Even if that were true that argument fails to consider the disparity of relief which is one of the most important factors under Washington Law. Likewise,

the Defendant(s) failed to argue below or within their Responsive Brief that any findings made by the probate court were “material and essential” to the probate court decision rather than being merely “evidentiary” in nature. Similarly, the Defendant(s) impermissibly raise the “Privity” and/or “Virtual Representation” arguments on appeal even though waived for failure to make these arguments below. Regardless, neither Cathy Riste nor Tyler Riste were a “Party” as found by the Probate Court; nor were either of them “In Privity” with or “Virtually Represented” by Darrell Riste as impermissibly argued by the Defendant(s) for the first time on appeal because Darrell Riste’s interest in the probate matter was to prove the Riste Trust invalid so that he could take all property which otherwise would have passed to the Riste Trust under Section 4.2.1 of the Will. If Darrell Riste would have been successful in proving the Riste Trust invalid in the Probate matter neither Cathy Riste nor Tyler Riste would have had any rights to the property which otherwise passed to the Riste Trust. Clearly, Darrell Riste’s interests in the Probate Matter were oppositional to and highly divergent from those of Cathy Riste or Tyler Riste.

Presented by:

  
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