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

ANNE K.BLOCK,

Appellant,

v.

SPOKANE COUNTY,

Respondent.

OPENING BRIEF

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A. IDENTITY OF PETITIONER

Anne K. Block, Pro Se, citizen and award winning journalist, and a resident of Washington State.

B. COURT OF APPEALS DECISION

Trial Court granted Spokane County's Motion for Summary Judgment dismissing Block's public records case filed in Pend Oreille County.

Block v Spokane County misinterprets several key provisions of the Public Disclosure Act, RCW 42.17.250, et seq., (PDA) thereby conflicting with decisions of the Washington Supreme Court, and the clear mandate of the Public Records Act (PRA) itself. The trial court's decision creates uncertainty and confusion in the interpretation and application of the PDA, allows for an agency to label any record a juvenile record to deny the public's right to access to records, denies discovery and places the burden on the requester to prove that the record sought is not a juvenile record. The Trial Court's decision adversely affects the public's interests in open and accountable government by allowing an agency to claim a public mall video, logged into police evidence, is not a public record by simply mislabeling such record as a juvenile record.

Block v Spokane County appeal was filed on time, but such opening brief was delayed for two reasons; first, Plaintiff received a copy of the public mall video since the appeal was filed in this case, and attempted to resolve

this appeal with Respondent Spokane County to no avail, and sought time to file a Motion to Vacate pursuant to CR 60. Second, Plaintiff suffers from three major life impairments causing a delay in filing an Opening Brief seeking an extension of time to file an opening brief. For this, Plaintiff seeks a Motion to Extend Time to File Opening Brief.

The Petitioner filed this timely motion for direct review after the trial court refused to allow Petitioner the right to conduct discovery in a public records case and refused to review the public mall video in dispute to be reviewed by the trial court en camera prior to granting Respondent's Motion for Summary Judgement.

C. ISSUES PRESENTED FOR REVIEW

1. Whether the Plaintiff in a PRA action is entitled to the same scope of discovery allowed other civil plaintiffs under Washington's civil discovery rules?
2. Whether the Trial Court erred when it refused to allow Petitioner the right to conduct discovery in a public records case involving a public mall video recovered by Spokane County Sheriff's Office from Spokane Valley Mall security involving six adults and one minor?
3. In the event of conflict between the provisions of RCW 42.56 *and* any other act, which law governs - the Public Records Act or any other law?

D. STATEMENT OF THE CASE

1. Introduction

The fundamental right of the public to know the workings of their government through public records requests made under the Public Disclosure Act, RCW 42.17.250, et seq., and the role of the judiciary in administering the process from precedent to provisions of the Act. This case reflects the ongoing investigation of Spokane County Sheriff's Office refusal to turn over a public video involving four adults (two police officers, a woman who has been caught countless times stalking an underage child, and the mother of the child and two Security Officers from Spokane Valley Mall). Petitioner requested access to the mall video involving a Spokane County after hearing that a non-relative was stalking a child inside a public mall, and the Sheriff's Office's refusal to take any action against the adult stalker. Instead, the County falsely claimed that the child assaulted the adult, but refused to release the public mall video. First the Sheriff's Office admitted it had the video, and need to review it for potential exemptions. A month later, Petitioner received a letter from Spokane County Prosecutor's office claiming a broad exemption under the Juvenile record. The record was not sealed nor part of any formal criminal investigation. To help alleviate the county's potential concern of the video that might include pictures of a child, Petitioner sought and received permission from the child's mother to receive the video and the further advised Spokane County that Petitioner will not object to the

County releasing the video with child's picture redacted. However, Petitioner did advise the county that because the video was not "sealed" and was not part of any law enforcement investigation, withholding the public mall video was a per se violation of the PRA, asking once again for the county to reconsider its broad exemptions.

In late June 2018, the Spokane County Sherriff's Office all of the sudden released the public mall video that gave rise to this suit, but did so by redacting pictures of all persons. Petitioner again requested that the County reconsider its redaction the public mall video in this case, and further stated that she does not object to the County redacting the child's picture and/or name of the child entirely. Petitioner made attempts to get the County to resolve/settle this appeal, after receiving and reviewing a copy of the public mall video under RCW 42.56. Sadly for the taxpayers, Spokane County has refused to settle this case even though the public mall video Petitioner sought was not a juvenile record.

At stake here is citizens' rights to access public records who reasonably and responsibly sought access to public records under the 50-year old Act, the agency's long history of resistance in disclosing records it alone possesses and controls, and the lack of public records policies and training which caused the agency's failure under RCW 42.56 to simply claim, without an en camera review or discovery, an agency to wrongfully claim that a public mall

video is not a public record.

2. Factual and Procedural History

Pro Se Anne Block sent a public records request to the County of Spokane. The Sherriff's public record Officer first claimed that it had to review the video for potential redactions, but then after receiving advice from the County Prosecutor's Office, it claimed that it didn't have the record and it was now in the possession of the Prosecutor's Office. This after public record confirms that the Spokane County Mall Video was retrieved and logged into the evidence file by a Spokane County Sheriff's Officer. The timing of Petitioner's public records request was critical because in June 2016, Plaintiff had learned that Spokane County Sheriff's Officer involved in the mall incident that gave rise to this appeal was subject to internal affairs complaints involving lying on official police reports and subject to at least two excessive force complaints. The Sherriff Officer has been charged with lying on reports, and violating the civil rights of a citizen, i.e. excessive force. Petitioner had every reason to believe that the Sherriff Officer involved in the public mall video was also involved in lying on various police reports to cover up cyber-bullying of the child herein known as AF by Karie Travis, one of the adult's in the public mall video, and were good friends.

Two months ago, Spokane County Sherriff's Office turned over the public mall video at dispute in this case. They did so by redacting pictures of

persons entirely. Instead on complying with the PDA, Spokane County responded to the Petitioner's legitimate public records requests claiming falsely that the public mall video was a juvenile record simply because it said so. The video was not under court seal, and has since been released in redacted form, documenting that it was in fact a public record subject to RCW 42.56.

Soon after filing suit Petitioner sent the County "Plaintiff's First Set of Interrogatories and Request for Production of Documents." The County refuses to comply with discovery and filed a Motion for Summary Judgement, claiming falsely that the public mall video was a juvenile record exemption from public disclosure.

In response to Spokane County's Motion for Summary Judgment, Plaintiff filed a Motion to Continue CR 56 (f) citing Neighborhood Alliance v Spokane County, *or* in the alternative Plaintiff requested that the trial court conduct *en camera review* of the public mall video in dispute to determine whether or not the public mall video is a juvenile record or not. During oral argument, Petitioner correctly noted to the trial court that a Plaintiff in a public records case has a right to conduct discovery. The trial judge disagreed claiming that he does not read Our Supreme Court's holding in Neighborhood Alliance as giving a plaintiff the right to conduct discovery. Plaintiff further made the argument that without review of the video, trial court has now placed the burden on the plaintiff. This before plaintiff was

allowed to conduct any discovery.

The trial court denied plaintiff the right to conduct discovery, refused to conduct en camera review of the video, and granted Spokane County's Motion for Summary Judgement claiming that the public mall video was a juvenile record. The public mall video was never under seal.

The trial court virtually ignored well settled case law, rewrote the PDA, and held that Petitioner is not entitled to conduct discovery in a public records case.

The Petitioner argues that the trial court erred by denying Petitioner the right to conduct discovery, and further erred by refusing to conduct en camera review of the Spokane Valley Mall video in disputer before holding that the public mall video was in fact a juvenile record. By the trial court's errors, it did not read the statute "literally,"⁴ or construe the statute "liberally" in favor of promoting disclosure.⁵

Petitioner argues that the trial court erred in its decision stating that the County can simply claim that a public mall video is exempt from disclosure, refuse Plaintiff a right to conduct discovery, and hold that a public mall video is exempt from disclosure without ever reviewing it en camera. For the foregoing reasons, the trial court placed the burden on the requester to prove that the public mall video sought was not subject ot disclosure without

ever allowing requester to conduct discovery.

Petitioner believes that the trial court's decision, if allowed to stand, will allow any agency to "resist" public disclosure by simply claiming that any record involving a child is 100 % exempt from public disclosure.

If the trial court's order is allowed to stand in this matter, such decision will frustrate the PDA beyond just this case and virtually rewrite the PDA. This, in turn, will seriously erode the nearly 37 years of conscious and deliberate development of the PDA by authorizing trial courts to "balance the equities," allow only "sufficient" compliance, "disorganize public records" "resist disclosure of information by labeling every picture, police report, public video, 100 % exempt from public disclosure simply because a child appears in the video.

The trial court's refusal to allow discovery in this case, issue findings of fact that the public mall video in this case is not a public record, is in direct conflict with Our Legislature's intent, Washington State Supreme Court's holding in *Neighborhood Alliance v Spokane County* and cannot stand.

E. STANDARD OF REVIEW

Our review of both the agency action and the court opinions below is de novo. *Gendler*, 174 Wash.2d at 251, 274 P.3d 346 (citing RCW 42.56.550(3)).

F. LEGAL ARGUMENT

Under the court rules, what constitutes relevant discovery is broad. "Parties may obtain discovery regarding any matter, not privileged, which is relevant to the subject matter involved in the pending action." CR 26(b)(1). We have previously said that the decision not to disclose records and the reasons behind that decision "are precisely the subject matter of a suit brought under the Public Records Act." *PAWS*, 125 Wash.2d at 270, 884 P.2d 592 n. 17. And we expanded this in our most recent *Yousoufian* opinion, which made agency culpability the focus in determining daily penalties, thus making discovery regarding motivation relevant. *Yousoufian v. Office of Ron Sims*, 168 Wash.2d 444, 460, 229 P.3d 735 (2010). Of course, it may be within the trial court's discretion to narrow discovery, but it must not do so in a way that prevents discovery of information relevant to the issues that may arise in a PRA lawsuit.

Our Supreme Court held in *Neighborhood Alliance* in pertinent part "A party must answer deposition questions unless instructed not to because of privilege or discovery abuse. CR 30(d), (h). As in any other civil suit, the County should have responded to the interrogatories and allowed Knutsen to answer the deposition questions or else sought a protective order. Since discovery was not allowed to proceed, the record is incomplete, and we remand to the trial court for appropriate discovery. More expansive discovery

will likely lead to information or records relevant to the PRA requests made in this case...”

The rules of discovery provide that all relevant information likely to lead to admissible evidence is discoverable. In this case, the Respondent Spokane County refused to comply with plaintiff’s discovery requests completely, as it did not respond to the interrogatories or requests for production. This was improper. Under our rules, answers to interrogatories are to be served within 30 days of service, CR 33(a), and the same is true for requests for production, CR 34(b), or else the party must seek a protective order. Just as in *Neighborhood Alliance v Spokane County*, the County was required to respond to the Block’s discovery requests, did not seek a protective order, but instead filed a Motion for Summary Judgement claiming that the public mall video Petitioner sought was not a public record.

"The PRA mandates broad public disclosure." *Sargent v. Seattle Police Dep't*, 179 Wash.2d 376, 385, 314 P.3d 1093 (2013) (citing RCW 42.56.030); *Hearst Corp. v. Hoppe*, 90 Wash.2d 123, 127, 580 P.2d 246 (1978). It declares that "[t]he people of this state do not yield their sovereignty to the agencies that serve them. The people, in delegating authority, do not give their public servants the right to decide what is good for the people to know and what is not good for them to know." RCW 42.56.030. The PRA is "liberally construed and its exemptions narrowly construed to

promote this public policy and to assure that the public interest will be fully protected. **In the event of conflict between the provisions of this chapter and any other act, the provisions of this chapter shall govern.**" *Id.* To that end, State and local agencies are required to disclose their records upon request, unless the record falls within an exception. *Gendler v. Batiste*, 174 Wash.2d 244, 251, 274 P.3d 346 (2012) (citing RCW 42.56.070(1)).

In this case, the Agency refuses to comply with discovery and simply claimed that the public records act did not apply because the public mall video video/s sought were unilaterally labeled by the county exempt because a juvenile appeared in the video. The trial court refused to conduct an en camera and further refused to allow Plaintiff a legal right to conduct discovery to determine whether the video/s in question were not public record. By doing so, the trial court erred and placed the burden on the public record requester contrary to well settled case law.

The agency refusing to release records bears the burden of showing secrecy is lawful. *Sargent*, 179 Wash.2d at 385-86, 314 P.3d 1093 (citing *Newman v. King County*, 133 Wash.2d 565, 571, 947 P.2d 712 (1997)).

The trial court's refusal to allow discovery is in direct conflict with Our Supreme Court's holding in *Neighborhood Alliance*.

The trial court's decision to decision to not review the public mall video en camera violated our court's holding in *Gendler v. Batiste*, 174 Wash.2d 244, 251, 274 P.3d 346 (2012) (citing RCW 42.56.070(1)) which held in pertinent part "In the event of conflict between the provisions of this chapter *and* any other act, the provisions of this chapter shall govern."

In this case, the trial court had a conflict between the PRA and the Juvenile Records Act. Instead of construing the conflict between provisions of RCW 42.56 and any other act, it construed the conflict in against this the PRA ignoring well settled precedent.

1. Overview

By the trial court's holding that Petitioner is not allowed to conduct discovery in a public record case, the trial court ignored or misinterpreted Our Supreme Court's holding in *Neighborhood Alliance v Spokane County*, and essentially rewrote RCW 42.56 by placing the burden on the requester to prove that that a record withheld entirely from disclosure was not a public record without allowing discovery or simply conducting en camera of the public mall video in dispute in this appeal.

This effectively chills citizen challenges to agencies who wrongfully withhold label public records, refused to implement public records policies to protect against loss and destruction, and thumb their noses at the PRA by falsely claiming that a record is not public because it might have a juvenile in

the video. Reminding this court that the public mall video was not under seal and has since been released since this case was appealed.

As it stands, the trial court's decision creates a colossal deterrent to average citizens who have been denied access to a public mall video and who may have not have the know how to challenge an agency's decision to withhold a public mall video, by claiming its 100 % exempt from public disclosure. Very few citizens can afford a lawyer, and few lawyers will accept a PRA case on a contingent fee basis. The provisions of the PDA were carefully designed by the legislature to make the PRA entirely self -enforcing, and are designed to allow private citizens, such as Block to be its police force. Unless significant aspects of the decision are reversed, Block as a paradigm stands for the proposition that the agency has a right to decide what a citizen has a right to know or see, thus placing the burden of proof on the requester not the agency.

2. The Trial Court's Denial of Plaintiff's Right to Conduct Discovery Is Reversal Error and Overturns Our Supreme Court's Holding In Neighborhood Alliance v Spokane County

Our Supreme Court held in *Neighborhood Alliance* in pertinent part held "A party must answer deposition questions unless instructed not to because of privilege or discovery abuse. CR 30(d), (h). As in any other civil suit, the County should have responded to the interrogatories and allowed Knutsen to answer the deposition questions or else sought a protective order.

Since discovery was not allowed to proceed, the record is incomplete, and we remand to the trial court for appropriate discovery. More expansive discovery will likely lead to information or records relevant to the PRA requests made in this case...”

Just as in *Block v Spokane County*, the trial court refused to allow Plaintiff to conduct discovery knowing the county had already been served with Plaintiff’s First Set of Interrogatories and Request for Production of Documents. By doing so, the trial court erred.

3. Conflict Between the Public Records Act *and* any other Act Arose, Trial Court Committed Reversal Error Holding that the Other Act Governed Against Public Disclosure

By failing to conduct an analysis under RCW 42.56, the trial court erred by agreeing with Respondent County that the public mall video withheld was exempt without first determining whether or not the record was subject to disclosure under RCW.42.56. This chills a citizen challenge to improper withholding of records by falsely claiming that that a public mall video is a juvenile record. This favors resistant agencies, and turns back the clock in the evolution of open government, and encourages wrongful conduct by agencies. At the time of its passage and since, Washington’s PRA was been hailed as one of the most liberal and punitive public disclosure laws in the nation. Employing “some of the strongest language used in any

legislation,” the PDA is a “strongly worded mandate for broad disclosure of public records.”

“The mandate of liberal construction requires the court to view with caution any interpretation of the statute that would frustrate its purpose.” The purpose of the PRA is nothing less than “full access to information concerning the conduct of government on every level [as] a fundamental and necessary precondition to the sound governance of a free society.” RCW 42.17.010(2), (5), (11). Unless this Court intends to rewrite the PRA, the errors of the Block court will trickle down to trial courts and agencies, and divest the Act of what limited power it retains.

This court should now take the opportunity to review the provisions of the PRA by reviewing the Block case, and provide guidance for the hundreds of courts, thousands of agencies and millions of affected citizens of Washington State by making it clear to trial court/s that if an agency is claiming that a record sought is a juvenile record, it must first issue a legal analysis under PRA, but first, plaintiff has a legal right to conduct discovery as to the contents, and labeling of the record before Summary Judgement is issued.

This Supreme Court also has held that in interpreting a statute courts are to give effect to the intent and purpose of the Legislature in creating the statute. The “intent and purpose” of the PDA is anything but unclear.

The purpose of the public records act is to ensure the sovereignty of the people and the accountability of the governmental agencies that serve them. RCW 42.17.251; *Newman v. King County*, 133 Wash.2d 565, 570, 947 P.2d 712 (1997); *PAWS*, 125 Wash.2d at 251, 884 P.2d 592. *Limstrom v. Ladenburg*, 136 Wn.2d 595, 963 P.2d 869, (1998).

Under the *Block* court's interpretation, the sovereignty of the people and accountability of governmental agencies can now simply claim that a public mall video is not a public record by labeling it a juvenile record, and refusing a plaintiff the right to conduct discovery in a public records case.

In *Block*, the trial record fails to determine whether or not the public mall video is a juvenile record and further denied petitioner the basic right to conduct discovery in a public record case. In full view of the overriding mandate of the Act, especially the mandate that the act's provisions be construed liberally to effectuate its purposes, the statute must be read so that "disclosure". Otherwise agencies will be at liberty to label any record with a juvenile in it to simply state its exempt as a juvenile record without allowing discovery or at min. an en camera review of the public mall video.

Virtually every legislative modification of the already stringent Act has been to strengthen the policy of open government. Under *Block*, the trial court, without seeing or reviewing the public mall video, can arbitrarily allow an agency to label record/s as "juvenile records" without discovery or the court conducting en camera review.

Under *Block*, the burden is now on the requester to prove without discovery that a public record is not a juvenile record with no analysis as to whether the public mall video (record), even in part, is subject to RCW 42.56. The trial court erred by first giving weight without an en camera review of the public record sought that the Other Act Governed Against Public disclosure. This overturns our Supreme Court's holding in *Gentler* and rewrites RCW 42.56.070 (1).

G. CONCLUSION

The public's interest is open government, broad disclosure of public video/s as reflected by the facts of this case, began with a legitimate records request concerning woman stalking a minor inside the Spokane Valley Mall. The police retrieved the public mall video, labeled and logged into the evidence record, after the mother filed a criminal complaint against the female stalker. The stalker had a court order issued against her prohibiting her from being alone with the child (AF). Block, an award winning journalist, heard of this incident and sought police records as a result. From the police report, it was clear that video/s existed, and was in fact logged into the evidence log. As such, Block sought all video/s under RCW 42.56 in this matter. At first the County Sheriff's Officer admitted it had video/s, but then after receiving legal advice from the Spokane County Prosecutor's Office, falsely claimed that the public mall video was completely exempt from

disclosure by simply labeling the public mall video as a juvenile record. Since the filing of this appeal, Spokane County Sheriff's Office released the public mall video but redacted pictures of persons. The video had five adults, including two mall security officers, Spokane County Sheriff's Officers, a minor child (AF), Karie Travis (aka Karie Fleck) and the child's mother Jill Fleck. The County police report confirms that the County logged the at least one video into police evidence. At first, the County said it was reviewing the record for potential redactions or exemptions, so this prompted Block to state to the County that she makes objection to the County redacting (or pixeling out) the child's picture before disclosure. The County withheld the record entirely claiming it was a juvenile record.

Petitioner maintains that allowing an agency to simply claim that a public mall video is a juvenile record, will encourage all agencies and its officials to make such broad claims to hide records it alone possesses. Such precedent if allowed to stand would frustrate the PDA beyond *Block*. See *Gentler*.

Because of the relatively lack of standards or guidelines offered by the trial court's opinion, this case undoubtedly will be cited by defending agencies for years to come to support their arguments that an agency alone can label any video or record exempt by simply stating it's a juvenile record, without first allowing a Plaintiff to conduct discovery or at min. en camera review to determine whether it is or is not a public record.

In the trial court's verbal court transcript from Summary Judgement, the trial court judge agreed that this case should be reviewed by the Court of Appeals because the trial court judge said the law is not clear.

The Petitioner argues (1) a plaintiff has a right to conduct discovery in a public records case; (2) prior to a trial court holding that the public mall video was in fact a juvenile record it must first review the mall video on camera; and (3) and in order for a juvenile record not be to subject to RCW 42.56 it must be under seal. In this case, the trial court erred by refusing all three.

H. Relief Requested

For the foregoing reasons, this case should be remanded back to the trial court, allowing Plaintiff to conduct discovery upholding Our Supreme Court's decision in *Neighborhood Alliance v County*, 261 P.3d 119 (2011). Until Plaintiff has a right to conduct discovery, this case was not ripe to grant Respondent's Motion for Summary Judgement or at min. the trial court must review the record prior to holding that the record the agency withholds is in fact under seal and truly a juvenile record.

Petitioner also seeks costs, loss time from work as results of having to file this appeal, fees associated with this appeal and expenses.

Respectfully signed and submitted this 9th day of September 2018 at Monroe, Washington.

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CERTIFICATE OF SERVICE

I, Anne Block, declare and state that on the 9th day of September 2018, I upload via Washington Court of Appeals Portal a true copy of the foregoing Opening Brief in Block v Spokane County WA Court of Appeals Division III. Case No: 358895.

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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 and belief.

Dated this 9th day of September 2018 at Monroe Washington.



Anne Block, Pro Se

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