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COURT OF APPEALS
STATE OF WASHINGTON
DIVISION III

STATE OF WASHINGTON,)	
Respondent,)	
)	NO. 36085-7-III
v.)	
)	Douglas County Superior
PATRICIA ANN VITTORIO,)	Court No. 17-1-00093-4
Petitioner/Appellant)	
)	

RESPONDENT'S BRIEF

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TABLE OF CONTENTS

	<u>Page</u>
TABLE OF CONTENTS.....	i
TABLE OF AUTHORITIES.....	ii
A. INTRODUCTION.....	1
B. IDENTITY OF RESPONDENT.....	1
C. ASSIGNMENT OF ERROR.....	1
D. STATEMENT OF THE CASE.....	1
E. AUTHORITY AND DISCUSSION.....	5
1. Standard of Review.....	5
2. The trial court did not abuse its discretion by excluding inadmissible and irrelevant evidence.....	7
a. The evidence that Appellant sought to introduce was inadmissible hearsay.....	7
i. The proffer of testimony involving a “conspiracy” is inadmissible hearsay.....	7
ii. The medical testimony that Appellant sought to introduce was cumulative hearsay.....	11
b. The evidence that Appellant sought to admit was irrelevant.....	12
3. Even if the court abused its discretion, it did not prevent Appellant from putting on her defense.....	13
4. The evidence of Appellant’s guilt was so overwhelming as to render any error harmless beyond a reasonable doubt.....	15

F. CONCLUSION.....18

TABLE OF AUTHORITIES

Supreme Court Cases

Chambers v. Miss., 410 U.S. 284, 93 S. Ct. 1038 (1973).....7

Federal Cases

United States v. Blackwell, 459 F.3d 739, (6th Cir. 2006).....6

Washington v. Schriver, 255 F.3d 45, (2d Cir. 2001).....6

Washington State Supreme Court Cases

State ex rel. Carroll v. Junker, 79 Wn.2d 12, 482 P.2d 775
(971).....6

MacKay v. MacKay, 55 Wn.2d 344, 347 P.2d 1062 (1959).....6

State ex rel. Nielsen v. Superior Court, 7 Wn.2d 562, 110 P.2d 645,
(941).....6

State v. Dye, 178 Wn. 2d 541, 309 P.3d 1192 (2013).....6

State v. Whelchel, 115 Wn.2d 708, 801 P.2d 948 (1990).....7

State v. Darden, 145 Wn.2d 612, 41 P.3d 1189 (2002).....7,13

State v. Jones, 168 Wn.2d 713, 168 Wn.2d 713 (2010).....7

Mad River Orchard Co. v. Krack Corp., 89 Wn.2d 535, 573 P.2d 796
(1978).....9

State v. Brown, 113 Wn.2d 520, 782 P.2d 1013 (1989).....9

<u>State v. Aguirre</u> , 168 Wn.2d 350, , 229 P.3d 669 (2010).....	9
<u>State v. Otis</u> , 151 Wn. App. 572, 213 P.3d 613 (2009).....	9
<u>Ford v. United Bhd. of Carpenters</u> , 50 Wn.2d 832, 315 P.2d 299 (1957).....	10
<u>State v. Smith</u> , 85 Wn.2d 840, 540 P.2d 424 (1975).....	10
<u>State v. Powell</u> , 126 Wn 2d 244, 893 P 2d 615 (1995)	10
<u>State v. Lee</u> , 188 Wn.2d. 473, 494-95, 396 P.3d 316, (2017).....	13
<u>State v. Guloy</u> , 104 Wn.2d 412, 705 P.2d 1182 (1985).....	15
<u>Washington State Appellate Court Cases</u>	
<u>State v. Blair</u> , 3 Wn. App. 2d 343, 415 P.3d 1232 (2018).....	5,6
<u>State v. Burnam</u> , 4 Wn. App. 2d 368, 421 P.3d 977 (2018)9,.....	10
<u>State v. Negrin</u> , 37 Wn. App. 516, 681 P.2d 1287 (1984).....	9
<u>State v. Bernson</u> , 40 Wn. App. 729, 700 P.2d 758 (1985).....	10
<u>State v. Shaffer</u> , 18 Wn. App. 652, 571 P.2d 220 (1977).....	11
<u>State v. Freeman</u> , 17 Wn. App. 377, 563 P.2d 1283, (1977).....	11
<u>State v. Lopez</u> , 95 Wn. App. 842, 980 P.2d 224 (1999).....	12
<u>Washington State Court Rules</u>	
ER 801.....	8
ER 609(a).....	9
ER 803(a)(3).....	10
ER 403.....	11

A. INTRODUCTION

On May 25, 2018, Appellant, Patricia Vittorio was found guilty of: Count 1: Theft in the Second Degree, Count 2: Malicious Mischief in the Third Degree, Count 3: Malicious Mischief in the Third Degree, Count 4: Making a False or Misleading Statement to a Peace Officer, and Count 5: Malicious Mischief in the Third Degree. At sentencing Appellant was ordered to serve four (4) months in confinement, and from such judgment and sentence she timely appeals.

B. IDENTITY OF RESPONDENT

Respondent is the State of Washington, by and through Steven M. Clem, Douglas County Prosecuting Attorney, and his deputy, Julia E. Hartnell.

C. ASSIGNMENT OF ERROR

Respondent, State of Washington, assigns no errors to this matter and responds only to the issues presented by Appellant.

D. STATEMENT OF THE CASE

Patricia Vittorio and James Elliott moved in together at the end of June or beginning of July in 2017 after having been in a dating relationship for several months. RP 33. The relationship

between them quickly soured and Appellant was to move out of Mr. Elliott's home on July 16, 2017. RP 35. Appellant's behavior led to their roommate, Stephen Mendenhall, placing a camera in the home to record what was occurring. RP 35. In the video, Appellant can be seen in the living room of the house. Ex. 1. RP 38. She is alone in the house except for brief periods when she is contacted by law enforcement and when she has male associates in the house moving the television. Ex. 1.

On the video Appellant can be seen pushing a bookcase down the stairs to the landing of the split-level house. Ex. 1. She screams after she pushes the bookcase and then proceeds to call for law enforcement. Ex 1, RP 40. When Douglas County Sheriff's Deputy Taylor Melton arrives, Appellant indicates that Mr. Elliott caused the bookcase to fall on her and that in so doing he injured her ankle. Ex.1, RP 45-47, 152. Deputy Melton examined Appellant's ankle, took photographs of the ankle, and noted a lack of injury, he also took photos of the bookcase with Appellant standing by him, pointing it out. Ex. 1, RP 45-47, 152. At trial despite being shown the video of herself multiple times, Appellant refused to acknowledge that she pushed the bookcase down the stairs. RP 183.

Appellant is also seen on the video going up to the darkened fish tank in the corner of the room, opening a Tupperware container, and placing an unknown item in the fish tank as well as using her hand to stir the water. Ex. 1, RP 42.

Appellant claimed at trial that it was her job to care for the fish, yet she could not describe what algae was in the tank. RP 187. She indicated that she fed the fish "pellets" provided by Mr. Elliott. RP 189. Appellant's testimony was contradicted by Mr. Elliott and Mr. Mendenhall's testimony that a) during an algae bloom the fish were not to be fed, b) Mr. Elliott was the one who fed the fish, and c) the proper food for the fish was either fish food flakes, kept in a round canister under the fish tank, or blister packed blood worms kept in the freezer, and that the fish were not fed anything that would be kept in a Tupperware type container. RP 42-43, 78-80.

The fish tank was a particular passion of Mr. Elliott and every fish in the tank died. RP 78. Contrary to what is alleged in Appellant's brief, Mr. Elliott testified that he was an experienced keeper of fish, that the tank had an algae bloom, that he had dealt with similar algae blooms in the past, and that the pre-existing algae bloom would not have killed the fish but for the introduction of a foreign substance into the tank. RP 80-81, RP 103, RP 117.

Both Mr. Elliott and Mr. Mendenhall testified that the tank had the distinct odor of cat feces when they discovered the foreign substance. RP 51, RP 81.

Appellant is then seen with a group of males in the apartment, directing them to enter the upstairs bedroom off the living room. Ex. 1. They then exit the bedroom with a large flat screen television that has an orange and black blanket placed over it. Ex. 1. As the males are walking out of the bedroom, one of Appellant's associates asks her "Is this yours?" and Appellant responds in the affirmative. Ex. 1. During a later search of Appellant's apartment, the blanket that was on the television is found in her apartment. RP 128, Ex. 8. While in custody, but still having use of her cell phone, Appellant informed Deputy Tom Williams that the television had been returned to Mr. Elliott's residence. RP 130. Deputy Taylor Melton responded to the area and no one was home, later that same evening they received a call from Mr. Elliott indicating that the television had been returned and placed outside his home. RP 154-156.

In cleaning up his home after Appellant moved out, Mr. Elliott noted that his mattress was ruined due to human urine. RP 95. Mr. Elliott also discovered that his collection of valuable Magic: The

Gathering cards were missing, and that a large pile of cards had been destroyed by someone pouring laundry detergent on the cards. RP 94-95. Mr. Elliott recovered one binder of his cards from the Appellant's home from the individuals who were subleasing Appellant's apartment. RP 95.

Because of her actions Appellant was charged with Theft in the Second Degree relating to the theft of the television, Making a False Statement to a Law Enforcement Officer related to her conduct regarding the book case, and three counts of Malicious Mischief related to the fish tank, the bed, and the Magic, the Gathering Cards respectively. Index 29-32.

E. AUTHORITY AND DISCUSSION

1. Standard of Review

The first question before this court is whether the trial court abused its discretion in its evidentiary ruling excluding the Appellant's proffered evidence. If there was no abuse of discretion, the inquiry ends, and no further analysis is needed. State v. Blair, 3 Wn. App. 2d 343, 352, 415 P.3d 1232 (2018). "Where the decision or order of the trial court is a matter of discretion, it will not be disturbed on review except on a clear showing of abuse of discretion, that is, discretion manifestly unreasonable, or exercised on untenable grounds, or for

untenable reasons.” State ex rel. Carroll v. Junker, 79 Wn.2d 12, 26, 482 P.2d 775 (1971), *citing*: MacKay v. MacKay, 55 Wn.2d 344, 347 P.2d 1062 (1959); State ex rel. Nielsen v. Superior Court, 7 Wn.2d 562, 110 P.2d 645, (1941). A decision is manifestly unreasonable in that it falls outside of the range of acceptable choices given the facts and applicable legal standard. State v. Dye, 178 Wn. 2d 541, 548, 309 P.3d 1192 (2013). A decision is based on untenable grounds is one wherein the factual findings are unsupported by the record. Id. And a decision is based on untenable reasons, if based on an incorrect standard or the facts do not meet the requirements of the correct standard. Id. “When a defendant argues that an adverse evidentiary ruling violates the right to a fair trial or the right to confrontation, it does not change the standard of review. If the trial court did not abuse its discretion, the inquiry ends. There is no error. If the trial court erred in its evidentiary ruling, then we review the constitutional claim de novo.” Blair, 3 Wn. App. 2d 343 at 353.

If the trial court abused its discretion, Appellant’s subsequent constitutional claim can only succeed if the exclusion of the proffered evidence evaluated in the context of the entire record creates a reasonable doubt that did not otherwise exist. United States v. Blackwell, 459 F.3d 739, 753 (6th Cir. 2006), *citing* Washington v.

Schriver, 255 F.3d 45, 57 (2d Cir. 2001). Even Constitutional error is harmless if the appellate court is convinced beyond a reasonable doubt that any reasonable jury would have reached the same result without the error. State v. Whelchel, 115 Wn.2d 708, 728-730, 801 P.2d 948 (1990).

2. The trial court did not abuse its discretion by excluding inadmissible and irrelevant evidence.

“The accused, as is required of the State, must comply with established rules of procedure and evidence designed to assure both fairness and reliability in the ascertainment of guilt and innocence.” Chambers v. Miss., 410 U.S. 284, 302, 93 S. Ct. 1038 (1973). Evidence that a defendant seeks to introduce “must be of at least minimal relevance.” State v. Darden, 145 Wn.2d 612, 622, 41 P.3d 1189 (2002). Defendants have a right to present only relevant evidence, with no constitutional right to present irrelevant evidence. State v. Jones, 168 Wn.2d 713, 720, 168 Wn.2d 713 (2010). The excluded evidence that is the substance of Appellant’s appeal is both inadmissible and irrelevant.

a. The evidence that Appellant sought to introduce was inadmissible hearsay.

i. The proffer of testimony involving a “conspiracy” is inadmissible hearsay.

During *in camera* hearings regarding the State’s *Motion in Limine* the trial court ruled that Appellant could not introduce hearsay evidence of an alleged conspiracy between Mr. Elliott and Appellant’s ex-husband. RP 15, RP 63-64. A limited proffer of the proposed testimony indicates that Appellant was going to testify that she overheard a conversation that she believed to be between Mr. Elliott and her ex-husband that created a “grand conspiracy” planned by Mr. Elliott and the ex-husband to have Appellant arrested. Rp 11-12, RP 64.

This conversation is hearsay. ER 801. It is being offered for the truth of the matters asserted, because, as counsel for Appellant states: “we believe that the conversation is relevant ...why they are making up this story about her stealing the television.” TR 64, ER 801. The statements that Appellant seeks to admit are vague and speculative. At no point does Appellant offer a clear proffer of what the proposed testimony would be, but rather relies on innuendo of a “grand conspiracy”. RP 10.

The information provided by Appellant in her proffer did not indicate any details about how or when Mr. Elliott and Mr. Vittorio

were going to frame Appellant. “An offer of proof should (1) inform the trial court of the legal theory under which the offered evidence is admissible, (2) inform the trial court of the specific nature of the offered evidence so the court can judge its admissibility, and (3) create an adequate record for appellate review.” State v. Burnam, 4 Wn. App. 2d 368, 377, 421 P.3d 977 (2018), *citing*: State v. Negrin, 37 Wn. App. 516, 525, 681 P.2d 1287 (1984) (*quoting* Mad River Orchard Co. v. Krack Corp., 89 Wn.2d 535, 537, 573 P.2d 796 (1978)). Evidence sought to be admitted without an offer of proof is not preserved for appeal. See *e.g.*: State v. Brown, 113 Wn.2d 520, 534, 782 P.2d 1013 (1989) (requiring an offer of proof of defendant’s proposed testimony if the Defendant elects not to testify due to admission of ER 609(a) evidence). Furthermore, “we note that even if the issue was preserved, the trial court did not abuse its discretion. While defendants have “a constitutional right to present a defense, the scope of that right does not extend to the introduction of otherwise inadmissible evidence.” State v. Aguirre, 168 Wn.2d 350, 362-63, 229 P.3d 669 (2010) (*citing* State v. Otis, 151 Wn. App. 572, 578, 213 P.3d 613 (2009)).

Appellant’s information cannot be said to be a statement of future intent due to how speculative it is. A victim's out-of-court

statements which tend to prove a plan, design, or intention of the declarant are admissible under ER 803(a)(3). See E. Cleary, McCormick on Evidence § 295 (3d ed. 1984). "The only limitations as to the use of such statements . . . are that the statements must be of a present existing state of mind and must appear to have been made in a natural manner and not under circumstances of suspicion". State v. Bernson, 40 Wn. App. 729, 738, 700 P.2d 758 (1985) citing: Ford v. United Bhd. of Carpenters, 50 Wn.2d 832, 837, 315 P.2d 299 (1957). See also State v. Smith, 85 Wn.2d 840, 854, 540 P.2d 424 (1975). The cases that provide for the admission of a statement of future intent all require that the information must be relevant to a fact at issue. Burnham, 4 Wn.App. 2d at 378. The state of mind exception is generally limited to cases wherein the state of mind of the victim is at issue in cases such as accident or self defense. State v. Powell, 126 Wn.2d 244, 266, 893 P.2d 615 (1995). The state of mind exception has been expanded to statement regarding future intent to show that a victim completed an action they intended such as going to a location. Id. However, statements of future intent require conformity with the intent to act. Therefore because there is no evidence outside of Appellant's speculation to show that Mr. Elliott acted in conformity

with an alleged conspiracy, as Appellant directed the television removed from the home, placed the unknown substance in the fish tank, and was the one who lied to law enforcement, the statement is inadmissible. Id.

ii. The medical testimony that Appellant sought to introduce was cumulative hearsay.

Appellant sought to introduce medical evidence from a trip to the Central Washington Hospital Emergency Room the night before the incidents at issue. Under ER 403, the Court has the discretion to refuse to admit cumulative evidence, and will not be reversed absent an abuse of discretion. State v. Shaffer, 18 Wn. App. 652, 654, 571 P.2d 220 (1977), review denied, 90 Wn. 2d 1014, cert. denied, 439 U.S. 1050, 58 L. Ed. 2d 710, 99 S. Ct. 729 (1978) (citing State v. Freeman, 17 Wn. App. 377, 563 P.2d 1283, review denied, 89 Wn. 2d 1007 (1977)). Appellant was not prevented from disclosing that she went to the hospital or that she had received medical treatment. Calling the medical providers to merely bolster her credibility would be cumulative. To be admissible as a statement for the purpose of medical diagnosis or treatment, there must be a showing that there is no indication that the victim believes his or her statement will be used for criminal prosecution.

State v. Lopez, 95 Wn. App. 842, 849, 980 P.2d 224 (1999). This cannot be the case. Appellant sought a protective order against Mr. Elliott and cited information contained in the medical record in so doing. Index 18-23. It is clear that her intent when she made the statements to the medical providers was to have the statements used in future prosecution. Lopez, 95 Wn. App. at 849.

b. The evidence that Appellant sought to admit was irrelevant.

The issue before the jury was not whether or not Mr. Elliott and Appellant had a good relationship, or even if Mr. Elliott's actions during the relationship were all without reproach. The issue before the jury was whether or not Appellant stole Mr. Elliott's television, destroyed his property, and lied to law enforcement. Within that narrow framework, none of Appellant's proposed evidence, even if otherwise admissible, meets the requirements for relevance.

Appellant sought to introduce the medical evidence for the purpose of alleging that Mr. Elliott had sexually assaulted her. RP 145, 188. Appellant clearly wanted to use the fact of her Sexual Assault exam to negatively affect the jury into believing that she had been sexually assaulted by Mr. Elliott, as seen by her repeated disregard of the Court's orders. RP 179, 188. Even mere allegations of sexual assault are highly prejudicial, and would

confuse the jury as to the issues at hand. State v. Lee, 188 Wn.2d. 473, 494-95, 396 P.3d 316, (2017). The State's interests against the introduction of such highly prejudicial evidence outweighs Appellant's need for the information sought. Darden, 145 Wn. 2d at 622.

3. Even if the court abused its discretion, it did not prevent Appellant from putting on her defense.

Appellant's defense was a general denial of the charges. This denial was not effected by Appellant's ability or inability to admit the evidence sought. Throughout the testimony it was readily apparent that Appellant and Mr. Elliott had an antagonistic relationship. Appellant used that antagonistic relationship throughout the trial to attempt to cast doubt on Mr. Elliott's credibility. RP 232

Appellant's defense to the theft of the television charge and to the malicious mischief charges related to the bed and the Magic, the Gathering cards was that Mr. Elliott fabricated the situation. Appellant was clearly able to present information to the jury of Mr. Elliott's bias against her. Appellant was also able to attempt to cast doubt on the account of Mr. Mendenhall by citing his long standing relationship with Mr. Elliott. RP 232. Appellant did not need the

introduction of inadmissible hearsay to make it clear to the jury that Mr. Elliott would have a motive to fabricate.

Appellant's defense to the charges related to the fish was that Mr. Elliott's own incompetence led to the death of the fish. RP 231-233. Through cross-examination, her counsel attempted to demonstrate this issue. RP 101-105. His inability to do so does not mean that Appellant was not able to present a defense, but rather the strength of the evidence against Appellant.

Appellant's defense to the charges related to her false statement to law enforcement was that she was actually referring to a different bookshelf and an event that had occurred at a different time. RP 184. She was able to present that information to the jury, and present her defense to the charge. Appellant alleges in her brief that evidence of her dehydration would have explained how she could have been "mistaken" regarding the book case, however she offers no evidence to support the theory that dehydration days before her contact with Deputy Melton affected her ability to tell the truth. The jury was able to see Appellant's actions on the video tape and determine for themselves whether or not she was in control of her faculties at the time she made her statements to Deputy Melton. Ex. 1

a. The evidence of Appellant's guilt was so overwhelming as to render any error harmless beyond a reasonable doubt.

Any error in this case is harmless because the evidence of Appellant's guilt is so overwhelming that it necessarily leads to a finding of guilt. State v. Guloy, 104 Wn.2d 412, 425, 705 P.2d 1182 (1985), cert. denied, 475 U.S. 1020 (1986). Appellant was seen on video committing the crimes she was convicted of. Ex. 1. Appellant's flimsy explanations and implausible excuses would not have yielded a different result had the jury heard them. Appellant's denial of the facts seen on the video in front of the jury clearly demonstrated her skewed interpretation of the events that occurred. RP 183-184. Appellant alleged that it was her responsibility to care for the fish yet could not provide any information about how to care for a fish tank during an algae bloom. RP 187. Appellant is seen opening a gladware style container, dumping the contents of the container in the fish tank and swirling the water in the tank with her hand, and then washing her hands. Ex. 1. Appellant's claim that it was her job to feed the fish and that she was feeding the fish by placing the contents of the gladware in the tank is implausible. Even the most ignorant juror would know that fish food does not come in gladware style

containers and the testimony from both Mr. Elliott and Mr. Mendenhall made clear that the container was not how the fish food was stored. RP 42-43, RP 78-80. Mr. Elliott testified at length to his longstanding care of fish, to their therapeutic importance to him and to the reasons behind his decisions on how to care for the fish tank. RP 78-80, 101-106. The photograph admitted as exhibit 2 shows the foreign material in the fish tank, which both Mr. Mendenhall and Mr. Elliott stated had the distinct aroma of cat feces, the introduction of which any reasonable jury could find would cause the death of all the fish in the tank. Ex. 2.

The television taken from the home is removed from the home on July 17, 2017, and returned later that same day. Ex. 1. RP 156. The male helping Appellant move is heard asking her if the television is hers. Ex. 1. Appellant responds in the affirmative, there is no reason for him to ask that question unless his suspicions of Appellant's actions were roused. Ex. 1. The blanket that was on the television as it left the apartment was later found in Appellant's apartment. RP 128, Ex. 8. Though the television was not recovered at Appellant's apartment, it was recovered outside Mr. Elliott's home after Appellant indicated that it had been returned to Mr. Elliott's home while she was under arrest. RP 130-131, 156.

Both Mr. Mendenhall and Mr. Elliott testified that Appellant did not own a television of a similar size or shape and that the television that was recovered was Mr. Elliott's television. RP 48, 75 There is no video of any other television leaving Mr. Elliott's home. Ex. 1.

Appellant is seen on the video pushing a bookcase down the stairs of the home. Ex. 1. Shortly thereafter, she is seen on the video speaking to Deputy Taylor Melton. Ex. 1. During her conversation with Deputy Melton she alleges that Mr. Elliott pushed the bookcase down on top of her. Ex. 1 RP 152. That is false. Deputy Melton documents both Appellant's ankle and the bookcase at her request. Ex. 1, RP 153. At trial Appellant denied what the jury could clearly see, that she pushed the fully loaded bookcase down the stairs. RP 185 Appellant, further contradicting her actions on the video, testified that a different bookcase was the one that was pushed upon her, even as she is seen on the video directing Deputy Melton to take a photo of the bookcase that she pushed down onto the stairs. RP 185 and Ex. 1.

Because the evidence of these three counts is so overwhelming and Appellant's credibility was severely damaged by her repeated falsehoods, any reasonable jury would discount her credibility. Evidence of a scheme or conspiracy by Mr. Elliott would

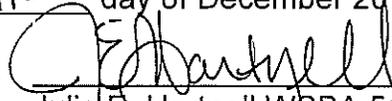
not enable Appellant to overcome the self-inflicted damage to her credibility. Evidence that she had been dehydrated and had a vaginal injury of unknown origin would not have bolstered her credibility to overcome the video evidence of her actions.

F. CONCLUSION

Based on the foregoing facts and authorities, the State respectfully requests this court to affirm the trial court's judgment and sentence and dismiss the appeal.

Respectfully submitted this

11th day of December 2018.



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