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NO. 36244-2-III

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

JOHN L. CORRIGAN,

Plaintiff/Appellant,

v.

GRANT COUNTY, TIMOTHY KRON, ET AL,

Defendant/Respondents.

RESPONDENT TIMOTHY KRON'S ANSWERING BRIEF

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I. INTRODUCTION

This case is not as complicated as the procedural history would suggest. Rather, Appellant John Corrigan refuses to accept the judgment of the court. He has now sued Trooper Kron three times for the same incident arising out of a speeding infraction. All three suits have been dismissed— twice in federal court on summary judgment and most recently by the Kittitas County Superior Court on a motion to dismiss. The third dismissal is the subject of this appeal.

Despite the claims against Trooper Kron having been previously dismissed twice, in the Kittitas County lawsuit Mr. Corrigan named Trooper Kron as a party for the third time. Trooper Kron moved to dismiss on the basis of failure to state a claim, res judicata, and lack of service of the Amended Complaint. CP at 363-71. The court granted the motion to dismiss pursuant to CR 12(c), 12(b)(6), and 12(b)(5), and Mr. Corrigan now appeals. CP at 385-386.

II. COUNTERSTATEMENT OF THE ISSUES

1. Does Mr. Corrigan establish the lack of an adequate record for appeal, where he does not identify what specific information he is lacking, fails to identify the offending party, and cites no authority for his proposition that reversal is required?

2. Did the trial court properly dismiss Mr. Corrigan's claims against Trooper Kron when (1) no claim for "fair trial" exists in Washington state, Trooper Kron was not in control of the prosecution, and Mr. Corrigan was convicted of the crime charged; (2) two previous lawsuits based on the same factual allegations have been dismissed; and (3) Mr. Corrigan concedes Trooper Kron was never served with the Amended Complaint?

III. COUNTERSTATEMENT OF THE CASE

In April of 2011, Mr. John Corrigan was driving westbound on Interstate 90 in Grant County when he sped by an unmarked patrol car driven by Trooper Kron. CP at 405. Trooper Kron pulled into the lane behind him and activated his lights and siren. CP at 405-06. For approximately eight miles, Mr. Corrigan refused to pull over until another officer joined the pursuit. CP at 406.

A district court jury convicted Mr. Corrigan on the charge of failure to stop. Mr. Corrigan appealed the conviction to superior court and it was dismissed without prejudice. CP at 407. The prosecutor refiled charges and Mr. Corrigan was convicted for a second time in November of 2013. CP at 408.¹

¹ Mr. Corrigan appealed his conviction to the Washington State Court of Appeals and Supreme Court. Both times the conviction was affirmed. He then appealed his "failure

As a result of his arrest and conviction, Mr. Corrigan brought suit in 2013 in federal court under 42 U.S.C. § 1983 alleging various constitutional violations, conspiracy, and malicious prosecution. He named as defendants two Washington State Patrol Troopers, Grant County, the Grant County prosecutor, a corrections facility sergeant, and the Chief Justice of the Washington Supreme Court. CP at 391-401.² Chief Justice Madsen's 12(b)(6) motion was granted and the remaining defendants moved for summary judgment. CP at 404. The court granted summary judgment and Mr. Corrigan's suit was dismissed. CP at 437. Mr. Corrigan appealed to the Ninth Circuit and it found, "[b]ecause the appeal is so insubstantial as to not warrant further review, it shall not be permitted to proceed." CP at 439.

Mr. Corrigan sued again in 2016 – this time adding additional prosecutors and three Grant County judges, but based on the same 2011 arrest and subsequent conviction. CP at 19-29. The suit was removed to federal court and Trooper Kron again brought a motion for summary judgement. The court dismissed the claims against Trooper Kron finding they were precluded by res judicata. CP at 467-76.

to stop" conviction to the United States Supreme Court which denied his request for appeal. CP at 480.

² United States District Court for the Eastern District of Washington Cause No. 13-CV-116-TOR

After Trooper Kron was dismissed from the lawsuit, Mr. Corrigan was granted leave to amend his complaint as to the remaining defendants. CP at 478-490.³ His Amended Complaint was subsequently remanded to state court. CP at 9-11, 19-29. Despite the claims against Trooper Kron having been dismissed twice, Mr. Corrigan named him as a party for the third time. Trooper Kron moved to dismiss on the basis of res judicata and failure to state a claim, as well as insufficient service given that Trooper Kron was never served with the Amended Complaint. CP at 363-71. The court granted the motion to dismiss pursuant to CR 12(c), 12(b)(6), and 12(b)(5), and Mr. Corrigan now appeals. CP at 385-386.

IV. ARGUMENT

A. Mr. Corrigan Does Not Establish The Lack of an Adequate Record For Review, or That It Would Warrant Reversal of the Order.

Mr. Corrigan believes that the transcription of the hearing on the Motion to Dismiss is inadequate, and contends without citation that this requires reversal of the underlying order. For an appeal, the “record on review” may include a report of proceedings, clerk’s papers, exhibits, and a certified record of administrative adjudicative proceedings. RAP 9.1. Notably, while RAP 9.1 provides that the record on review may include a

³ That order noted, “In a separate order, this Court granted Defendant Timothy Kron’s motion for summary judgment, finding that res judicata forecloses Corrigan’s claims against Kron.” CP at 481.

report of proceedings, it does not make the filing of one mandatory. RAP 9.1; *see also Matter of Estate of Watlack*, 88 Wn. App. 603, 609, 945 P.2d 1154, 1157 (1997). Ultimately, the appealing party has the burden to furnish sufficient information to apprise the court of the facts on which their assignments of error are predicated. *State v. Holbrook*, 66 Wn.2d 278, 280, 401 P.2d 971, 973 (1965). Further, a party contending that there is an inadequate record on appeal must apprise the court of the significance of the missing portion of the trial court record. *Favors v. Matzke*, 53 Wn. App. 789, 794, 770 P.2d 686, 689 (1989).

Here, Mr. Corrigan does not clarify what type of information the record is lacking that would prevent him from “satisfactorily respond[ing] to the appellate requirements.” Appellant Br. at 4. Furthermore, Mr. Corrigan did not include the Verbatim Report of Proceedings in the Clerk’s Papers, which undermines his argument that they are necessary to his appeal. Even if there may be moments in the transcript that were unintelligible, the basis for Judge Bartheld’s ruling is evident from the documents contained in clerk’s papers, such as the Grant County Motion to Dismiss, Trooper Kron’s Motion to Dismiss, Mr. Corrigan’s opposition pleadings, and Judge Bartheld’s orders.

B. The Trial Court Properly Dismissed Mr. Corrigan's Claims against Trooper Kron for Failure to State a Claim, Preclusion on Res Judicata Grounds, and Insufficient Service.

Judge Bartheld ruled that Mr. Corrigan's Amended Complaint failed to state a claim against Trooper Kron, that res judicata precluded Mr. Corrigan's claims against Trooper Kron, and that Trooper Kron was not served with the Amended Complaint. CP at 385-386. As such, Mr. Corrigan's claims against Trooper Kron were dismissed with prejudice. *Id.* Dismissal of a claim under CR 12 is reviewed de novo. *Wright v. Jeckle*, 104 Wn. App. 478, 481, 16 P.3d 1268, 1269 (2001), *as amended on reconsideration in part* (Mar. 6, 2001)(dismissal under CR 12(b)); *P.E. Sys., LLC v. CPI Corp.*, 176 Wn.2d 198, 203, 289 P.3d 638, 641 (2012)(dismissal under CR 12(c)).

1. Mr. Corrigan's Amended Complaint failed to state a claim against Trooper Kron.

Mr. Corrigan's Amended Complaint failed to state a claim against Trooper Kron, given that no claim for "fair trial" exists in Washington state, Trooper Kron was not in control of the prosecution, and Mr. Corrigan was convicted of the crime charged. An action should be dismissed under CR 12(b)(6) if it appears beyond doubt that the plaintiff can prove no set of facts, consistent with the complaint, that would entitle him to relief. *Yurtis v. Phipps*, 143 Wn. App. 680, 692, 181 P.3d 849 (2008). The motion

assumes the truth of the facts pleaded in the complaint, but the court is not required to accept the complaint's legal conclusions as true. *Rodriguez v. Loudeye Corp.*, 144 Wn. App. 709, 717-18, 189 P.3d 168 (2008). The gravamen of the court's inquiry is whether the plaintiff's claim is legally sufficient. *Gorman v. Garlock, Inc.*, 155 Wn.2d 198, 215, 118 P.3d 311 (2005). The complaint should be dismissed if it does not present legally cognizable claims. *Talarico by Johnston v. Foremost Ins. Co.*, 105 Wn.2d 114, 115, 712 P.2d 294 (1986).

In his amended complaint, Mr. Corrigan asserted causes of action for fair trial and retaliatory and malicious prosecution and claimed involvement by Trooper Kron.⁴ Judge Bartheld held that none of these stated a claim upon which relief could be granted. CP at 385-86. Mr. Corrigan asserts that the trial court somehow "erred by ruling on alleged material facts that Corrigan supported in his Amended Complaint." Appellant's Br. at 14. However, the "facts" described by Mr. Corrigan (abuse of process, statute of limitations, Grant County negligence, defendant Kron's service, and defendant Kron's Res Judicata claim) are more properly characterized as legal conclusions. The court is not required

⁴ Trooper Kron agrees with Grant County Defendants that dismissal of all of the claims in the Amended Complaint by Judge Bartheld was appropriate. However, the causes of action asserted against the Grant County Defendants have been briefed by their counsel and as such will not be addressed here.

to accept Mr. Corrigan’s legal conclusions as true. *See Rodriguez*, 144 Wn. App. at 717–18. In the present case, assuming the truth of facts pled in the Amended Complaint, neither of Mr. Corrigan’s claims against Trooper Kron (“fair trial” and retaliatory and malicious prosecution) are sufficient to withstand 12(b)(6).

a. Fair Trial

Mr. Corrigan’s “fair trial” claim fails, because there is no such civil cause of action in Washington State. For his alleged “fair trial” claim, Mr. Corrigan relied on Washington Constitution Art. I, ¶ 3, and the Code of Judicial Conduct. CP at 327. However, Mr. Corrigan cannot prevail on a claim based on the Washington Constitution, as “Washington courts have consistently rejected invitations to establish a cause of action for damages upon constitutional violations without the aid of augmentative legislation.” *Blinka v. Washington State Bar Ass’n*, 109 Wn. App. 575, 591, 36 P.3d 1094 (2001) (holding that article I, section 5 does not provide a private right of action); *see also Reid v. Pierce Cty.*, 136 Wn.2d 195, 961 P.2d 333 (1998) (en banc) (declining plaintiff’s invitation to create a private right of action for damages under article I, section 7 of the Washington Constitution); *Youker v. Douglas Cty.*, 178 Wn. App. 793, 797, 327 P.3d 1243 (2014) (“[O]ur Supreme Court has refused to create a constitutional cause of action for governmental privacy invasions ... Likewise, we decline to do so here.”);

Sys. Amusement, Inc. v. State, 7 Wn. App. 516, 518, 500 P.2d 1253 (1972) (holding that article I, section 3 does not create a cause of action for money damages).

Furthermore, the only involvement of Trooper Kron alleged is “perjury relating to Kron’s testimony at the second trial.” CP at 328. However, it is well settled in Washington that “there is no civil claim for perjury.”⁵ *Dexter v. Spokane Cty. Health Dist.*, 76 Wn. App. 372, 375, 884 P.2d 1353, 1355 (1994); *W. G. Platts, Inc. v. Platts*, 73 Wn.2d 434, 440, 438 P.2d 867, 871 (1968) (no civil cause of action for perjury); *FMC Techs., Inc. v. Edwards*, 464 F. Supp. 2d 1063, 1067 (W.D. Wash. 2006). Thus, Mr. Corrigan’s claim against Trooper Kron for violation of “fair trial” fails to state a claim upon which relief can be granted.

b. Retaliatory and Malicious Prosecution

Mr. Corrigan’s claim for retaliatory and malicious prosecution also fails, because Trooper Kron did not institute or continue the prosecution and the proceedings did not terminate on the merits in Mr. Corrigan’s favor. In order to establish a claim for malicious prosecution, a plaintiff must establish “(1) that the prosecution claimed to have been malicious was

⁵ Defendant disputes that Trooper Kron committed perjury. However, even if Trooper Kron had committed perjury, that could not serve as the basis for a civil lawsuit.

instituted or continued by the defendant; (2) that there was want of probable cause for the institution or continuation of the prosecution; (3) that the proceedings were instituted or continued through malice; (4) that the proceedings terminated on the merits in favor of the plaintiff, or were abandoned; and (5) that the plaintiff suffered injury or damage as a result of the prosecution.” *Hanson v. City of Snohomish*, 121 Wn.2d 552, 558, 852 P.2d 295, 298 (1993).

Here, Mr. Corrigan’s prosecution cannot serve as the basis for a malicious prosecution action, given that the proceedings were not terminated on the merits in favor of Mr. Corrigan. CP at 325. Additionally, Mr. Corrigan has not offered any authority regarding how Trooper Kron, a law enforcement officer, could be liable on a claim of malicious prosecution. Mr. Corrigan would need to establish that the prosecution was instituted or continued by Trooper Kron. *Hanson*, 121 Wn.2d at 558. Since Mr. Corrigan was unable to establish the required elements, Mr. Corrigan fails to state a claim against Trooper Kron.

2. Res judicata precluded Mr. Corrigan’s claims against Trooper Kron, given that two previous lawsuits based on the same factual allegations have been dismissed.

Two previous lawsuits based on the same factual allegations have been dismissed, and Mr. Corrigan’s claims against Trooper Kron in the present litigation are similarly precluded by res judicata. “Res judicata bars the

relitigation of claims that were litigated to a final judgment or could have been litigated to a final judgment in a prior action.” *Richert v. Tacoma Power Util.*, 179 Wn. App. 694, 704, 319 P.3d 882, 888 (2014). Res judicata is an issue of law. *Berschauer Phillips Const. Co. v. Mut. of Enumclaw Ins. Co.*, 175 Wn. App. 222, 227, 308 P.3d 681, 683 (2013). In order for the doctrine of res judicata to apply, “a prior judgment must have a concurrence of identity with a subsequent action in (1) subject matter, (2) cause of action, (3) persons and parties, and (4) the quality of the persons for or against whom the claim is made.” *Eugster v. Washington State Bar Ass’n*, 198 Wn. App. 758, 786, 397 P.3d 131, 145–46 (2017), *review denied*, 189 Wn.2d 1018, 404 P.3d 493 (2017); *Barrett v. City of Tacoma*, 109 Wn. App. 1012 (2001)(affirming dismissal under CR 12 based on res judicata).

When determining whether the cause of action element is met, courts consider “(1) whether rights or interests established in the prior judgment would be destroyed or impaired by prosecution of the second action; (2) whether substantially the same evidence is presented in the two actions; (3) whether the two suits involve infringement of the same right; and (4) whether the two suits arise out of the same transactional nucleus of facts.” *Rains v. State*, 100 Wn.2d 660, 663–64, 674 P.2d 165, 168 (1983). The *Rains* court noted that these the four factors are criteria a court should consider, but eschewed mechanical application of a test. *Id.*

Here, *res judicata* prevents relitigation of Mr. Corrigan's claims against Trooper Kron. First, the subject matter in the various lawsuits was the same. All of Mr. Corrigan's lawsuits against Trooper Kron were based on the 2011 arrest and subsequent prosecution. Compls. beginning at CP at 316, 391, 448. Additionally, the cause of action element is satisfied. In 13-CV-116-TOR, the District Court dismissed Mr. Corrigan's unlawful arrest and malicious prosecution claims. CP at 412-422. Substantially the same evidence would have been presented in both actions, the two suits involved infringement of essentially the same rights, and Mr. Corrigan relied upon the same operative facts in this lawsuit as he did in the previous lawsuits. Additionally, there was a concurrence of identity between the parties and quality of the persons⁶ because Corrigan was the plaintiff in both suits and brought claims against Trooper Kron in both suits. Furthermore, there was a final judgment on the merits, because the District Court summarily dismissed Corrigan's first suit on substantive grounds and the Ninth Circuit affirmed that dismissal. CP at 403-437, 439. It was this dismissal that served as the basis for Trooper Kron's dismissal from 13-CV-116-TOR on *res judicata* grounds.

⁶ "The quality of persons or parties is relevant in situations where the parties to two lawsuits are the same, but one or the other acts in a different capacity in the two proceedings." *Berschauer Phillips Const. Co.*, 175 Wn. App. at 231. That is not the case here.

CP at 467-476. Given this, the Court correctly found that the claims Corrigan asserted against Trooper Kron were barred by res judicata.

3. Mr. Corrigan's claims against Trooper Kron were dismissed for insufficient service, because Mr. Corrigan did not serve Trooper Kron.

Mr. Corrigan did not serve Trooper Kron with the Amended Complaint, so dismissal of his claims against Trooper Kron was appropriate. Under RCW 4.92:020, serving Washington State in a civil action must be accomplished by service on the Attorney General or by leaving the summons and complaint in the Office of the Attorney General with an assistant attorney general. *Landreville v. Shoreline Cmty. Coll. Dist. No. 7*, 53 Wn. App. 330, 766 P.2d 1107 (1988). Additionally, service upon individual defendants must be made personally or through "abode service." RCW 4.28.080(15); CR 4(d)(2). In this case, Plaintiff did not do either, nor does he claim that he made any attempt to do so. Appellant's Br. at 13. Rather, he contends without any supporting authority that his filing of the amended complaint electronically through the federal system is sufficient. CP at 375; Appellant's Br. at 13. However, because Trooper Kron had been dismissed from Cause No. 16-CV-3175-SMJ prior to the judge granting Mr. Corrigan leave to amend his complaint, service of the amended complaint was necessary to bring Trooper Kron back into the lawsuit. To the extent that Mr. Corrigan contends that state rules are inapplicable, Appellant's Br.

at 13, the federal rules also require personal or abode service on a party in order to commence a lawsuit, or the applicable state rules for service. Fed. R. Civ. P. 4. Because Trooper Kron was not served with the Amended Complaint, dismissal of the claims against him in the Amended Complaint for insufficient process was appropriate.

V. CONCLUSION

Based on the foregoing, Trooper Kron respectfully requests that this Court affirm the ruling of Judge Bartheld dismissing Mr. Corrigan's claims against Trooper Kron.

RESPECTFULLY SUBMITTED this 1st day of February, 2019.

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CERTIFICATE OF SERVICE

I certify that I served a copy of the foregoing document on all parties or their counsel of record on the date below as follows:

Via the Court's electronic filing system to:

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I certify under penalty of perjury under the laws of the state of Washington that the foregoing is true and correct.

DATED this 1 day of February, 2019, at Spokane, Washington.



NIKKI GAMON

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