

FILED
Court of Appeals
Division III
State of Washington
10/30/2019 8:00 AM

NO. 36809-2-III

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

STATE OF WASHINGTON,

Respondent,

v.

BETHANY WALLACE-CORFF,
Appellant.

ON APPEAL FROM THE SUPERIOR COURT OF THE
STATE OF WASHINGTON FOR YAKIMA COUNTY

The Honorable Michael G. McCarthy, Judge

BRIEF OF APPELLANT

LISE ELLNER WSBA No.20955
SPENCER BABBITT, WSBA No. 51076
Attorneys for Appellant

LAW OFFICES OF LISE ELLNER
Post Office Box 2711
Vashon, WA 98070
(206) 930-1090

TABLE OF CONTENTS

	Page
A. ASSIGNMENTS OF ERROR.....	1
Issues Presented on Appeal.....	1
B. STATEMENT OF THE CASE.....	2
Substantive Facts.....	2
Procedural Facts.....	4
i. Facts from 3.5 hearing.....	4
C. ARGUMENT.....	7
1. THE TRIAL COURT ABUSED ITS DISCRETION WHEN IT ADMITTED MS. WALLACE-CORFF'S RECORDED STATEMENT BECAUSE HER WAIVER OF THE RIGHT TO REMAIN SILENT WAS COERCED	7
2. THE STATE FAIELD TO PROVE BEYOND A REASONBLE DOUBT THAT MS. WALLACE-CORFF INTENDED TO INFLCIT GREAT BODILY HARM	13
D. CONCLUSION.....	16

TABLE OF AUTHORITIES

Page

WASHINGTON CASES

<i>State v. Bower</i> , 73 Wn.2d 634, 440 P.2d 167 (1968).....	10
<i>State v. Brown</i> , 158 Wn. App. 49, 240 P.3d 1175 (2010).....	8
<i>State v. Cervantes</i> , 62 Wn. App. 695, 814 P.2d 1232 (1991).....	12
<i>State v. Chambers</i> , 197 Wn. App. 96, 387 P.3d 1108 (2016).....	8
<i>State v. Cushing</i> , 68 Wn. App. 388, 842 P.2d 1035 (1993).....	10, 11
<i>State v. Elmi</i> , 166 Wn.2d 209, 207 P.3d 439 (2009).....	14
<i>State v. Engel</i> , 166 Wn.2d 572, 210 P.3d 1007 (2009).....	13
<i>State v. France</i> , 121 Wn. App. 394, 88 P.3d 1003 (2004).....	12
<i>State v. Gatewood</i> , 163 Wn.2d 534, 182 P.3d 426 (2008).....	13
<i>State v. Grogan</i> , 147 Wn. App. 511, 195 P.3d 1017 (2008).....	8
<i>State v. Guloy</i> , 104 Wn.2d 412, 705 P.2d 1182 (1985).....	12
<i>State v. Hardesty</i> , 129 Wn.2d 303, 915 P.2d 1080 (1996).....	16

TABLE OF AUTHORITIES

	Page
WASHINGTON CASES, continued	
<i>State v. Heritage</i> , 152 Wn.2d 210, 95 P.3d 345 (2004).....	7
<i>State v. Hickman</i> , 135 Wn.2d 97, 103, 954 P.2d 900 (1998) (Hickman II).....	16
<i>State v. Hickman</i> , 157 Wn. App. 767, 238 P.3d 1240 (2010).....	11
<i>State v. Homan</i> , 181 Wn.2d 102, 330 P.3d 182 (2014).....	13
<i>State v. Louther</i> , 22 Wn.2d 497, 156 P.2d 672 (1945).....	15
<i>State v. Pierre</i> , 108 Wn. App. 378, 31 P.3d 1207 (2001).....	14
<i>State v. Radcliffe</i> , 164 Wn.2d 900, 194 P.3d 250 (2008).....	8
<i>State v. Rhoden</i> , 189 Wn. App. 193, 356 P.3d 242 (2015).....	11
<i>State v. Riley</i> , 17 Wn. App. 732, 565 P.2d 105 (1977).....	10
<i>State v. Rosas-Miranda</i> , 176 Wn. App. 773, 309 P.3d 728 (2013).....	7
<i>State v. Rupe</i> , 101 Wn.2d 664, 683 P.2d 571 (1984).....	9
<i>State v. Sargent</i> , 111 Wn.2d 641, 762 P.2d 1127 (1988).....	7

TABLE OF AUTHORITIES

	Page
WASHINGTON CASES, continued	
<i>State v. Solomon</i> , 114 Wn. App. 781, 60 P.3d 1215 (2002).....	8
<i>State v. Stevenson</i> , 128 Wn. App. 179, 114 P.3d 699 (2005).....	13
<i>State v. Unga</i> , 165 Wn.2d 95, 196 P.3d 645 (2008).....	8
<i>State v. Wheeler</i> , 108 Wn.2d 230, 737 P.2d 1005 (1987).....	8
<i>State v. Wilson</i> , 125 Wn.2d 212, 883 P.2d 320 (1994).....	14
FEDERAL CASES	
<i>Mincey v. Arizona</i> , 437 U.S. 385, 98 S.Ct. 2408, 57 L.Ed.2d 290 (1978)	9
<i>Miranda v. Arizona</i> , 384 U.S. 436, 86 S.Ct. 1602, 16 L.Ed.2d 694 (1966) 4, 6, 7, 8, 9, 11	
<i>Rogers v. Richmond</i> , 365 U.S. 534, 81 S.Ct. 735, 5 L.Ed.2d 760 (1961)	11
RULES, STATUTES, AND OTHERS	
CrR 3.5	1, 4, 6, 8
RCW 9A.04.110.....	14
RCW 9A.36.011	14

A. ASSIGNMENTS OF ERROR

1. The trial court erred when it concluded that Ms. Wallace-Corff's recorded statement was admissible because her waiver of the right to remain silent was coerced by the prospect of her children being placed with CPS if police also arrested her ex-husband during their investigation.
2. Ms. Wallace-Corff assigns error to the trial court's Findings of Fact 46 and 47 from the CrR 3.5 hearing. She also assigns error to Conclusions of Law 4-6.
3. The state failed to prove the essential elements of assault in the first degree when it failed to present sufficient evidence that Ms. Wallace-Corff intended to inflict great bodily harm.

Issues Presented on Appeal

1. Did the trial court err when it concluded that Ms. Wallace-Corff's recorded statement was admissible when her waiver of the right to remain silent was coerced by the prospect of her children being placed with CPS if police also arrested her ex-husband

during the investigation?

2. Did the state present sufficient evidence that Ms. Wallace-Corff intended to inflict great bodily harm when the record suggests that the gun accidentally discharged when Mr. Whitaker reached for it?

B. STATEMENT OF THE CASE

Substantive Facts

During December of 2014, Gordon Whitaker was in a sexual relationship with both Darlene Hill and Bethany Wallace-Corff. RP 155-56. Both women were pregnant with Mr. Whitaker's child, but neither was aware of his relationship with the other woman. RP 158. Mr. Whitaker watched a football game and then went to Ms. Hill's house and fell asleep. RP 156-57. While Mr. Whitaker was asleep, Ms. Hill looked through his cell phone and discovered messages between Mr. Whitaker and Ms. Wallace-Corff discussing her pregnancy. RP 177-78. Ms. Hill called Ms. Wallace-Corff and invited her over to the house to confront Mr. Whitaker. RP 211-12.

Ms. Wallace-Corff retrieved a handgun she had stolen from her ex-husband's house. RP 119; Ex. 17. Ms. Wallace-Corff arrived at Ms. Hill's house and woke Mr. Whitaker up by tapping his feet at

the end of the bed. RP 157. Mr. Whitaker woke up to see Ms. Wallace-Corff standing at the end of the bed and Ms. Hill standing in the doorway of the bedroom. RP 157. Ms. Wallace-Corff told Mr. Whitaker that he “had some explaining to do” and that he “fucked with the wrong bitch.” RP 158-59. She pressed the gun to Mr. Whitaker’s left knee and fired a single shot into his leg before leaving the scene. RP 159.

Paramedics transported Mr. Whitaker to the hospital where he underwent surgery for the gunshot wound and a fractured femur. RP 130-31. Mr. Whitaker was initially uncooperative with investigators and refused to identify the shooter. RP 77-78. A couple of weeks after the incident, Mr. Whitaker contacted detectives and indicated he would cooperate with the investigation. RP 107. Mr. Whitaker identified Ms. Wallace-Corff as the shooter and provided some Facebook messages she had sent to him to police. RP 109-10; Ex. 14. A message from December 30th appeared to discuss the shooting:

I hope you see now that even the devil can be touched and there are repercussions to your revolting behavior and that some of us women aren't as helpless as you think. You're lucky I found out after I already broke up with you or I would have gave you a lot worse. I hope you think of me and your fatherless child every time you pull your pants over your

knees. I'm not angry with you anymore. I'm not a danger to you. I found my closure.

Ex. 14. Police arrested Ms. Wallace-Corff after meeting with Mr. Whitaker. RP 116.

Ms. Wallace-Corff provided a recorded statement at the police station. RP 121. In her statement, Ms. Wallace-Corff admitted that she went to Ms. Hill's house to confront Mr. Whitaker and brought the gun with her for protection. Ex. 22; CP 97. In Ms. Wallace-Corff's statement, she claimed that when she woke Mr. Whitaker, he grabbed the gun and caused it to accidentally discharge. Ex. 22; CP 98.

Procedural Facts

The state charged Ms. Wallace-Corff with one count of assault in the first degree and alleged that the crime was domestic-violence related. CP 8. Ms. Wallace-Corff waived her right to a jury trial and proceeded to a bench trial. RP 57-60; CP 67.

i. Facts from 3.5 hearing

Police initially contacted Ms. Wallace-Corff at her residence where they advised her of her Miranda rights. RP 13, 30-31. Ms. Wallace-Corff invoked her right to counsel and refused to answer questions so she was transported to the police department. RP 15.

At the police department, Ms. Wallace-Corff was told she was going to jail, that the police were looking for the gun involved in the incident, and that they were looking into her ex-husband as possibly being involved. RP 34-35. Ms. Wallace-Corff became concerned that her ex-husband was also going to be arrested and their children would be placed in foster care, so she agreed to give a statement. RP 36. A police officer advised Ms. Wallace-Corff of her Miranda rights a second time. RP 17. She indicated she understood her rights, waived them, and provided her statement. RP 17-20.

Ms. Wallace-Corff moved for suppression of her recorded statement on the basis that the waiver of her right to remain silent was coerced. RP 51-53. The trial court denied Ms. Wallace-Corff's motion and admitted the statement. RP 64-65; CP 101. The trial court found that Ms. Wallace-Corff voluntarily provided the statement after waiving her right to remain silent at the police station because Ms. Wallace-Corff never mentioned the threat of her children being placed with CPS as a reason for waiving her rights:

44. The defendant testified that she was contacted two times while in the holding cell of the Yakima Police Department. Once when Detective Shaw asked if she used a Colt .45, and the second to state that he was going to get [her ex-husband] involved.

46. The defendant is not deceitful in her testimony, but she is mistaken. If the two statements were made to her by Detective Shaw, it was after she was given her *Miranda* warnings for a second time and provided a recorded statement.

47. . . . There was nothing stated by Detective Shaw that prompted the Defendant's change of heart in giving a recorded statement at the Yakima Police Department after *Miranda* was re-read to her.

RP 64; CP 100. Based on these findings, the trial court concluded that Ms. Wallace-Corff voluntarily waived her rights and that her statement was admissible under CrR 3.5. CP 101.

The trial court found Ms. Wallace-Corff guilty as charged. RP 231; CP 81. The trial court found that Ms. Wallace-Corff suffered from major depressive disorder and that this condition prevented her from appreciating the consequences of her actions. CP 92-93. The trial court sentenced Ms. Wallace-Corff to an exceptional sentence downward. RP 231-32, 259-60; CP 105-06. Ms. Wallace-Corff filed a timely notice of appeal. CP 103.

C. ARGUMENT

1. THE TRIAL COURT ABUSED ITS DISCRETION WHEN IT ADMITTED MS. WALLACE-CORFF'S RECORDED STATEMENT BECAUSE HER WAIVER OF THE RIGHT TO REMAIN SILENT WAS COERCED

Police must advise a defendant of his or her *Miranda* warnings when they are questioned while in police custody. *State v. Rosas-Miranda*, 176 Wn. App. 773, 779, 309 P.3d 728 (2013) (citing *State v. Heritage*, 152 Wn.2d 210, 214, 95 P.3d 345 (2004)). Incriminating statements obtained from an individual in custody are presumed to be involuntary and inadmissible unless the state shows that the individual made a knowing and voluntary waiver of the right to remain silent. *State v. Sargent*, 111 Wn.2d 641, 648, 762 P.2d 1127 (1988).

“Whether a defendant validly waives his [or her] previously asserted right to remain silent depends on: (1) whether the police scrupulously honored the defendant's right to cut off questioning, (2) whether the police continued interrogating the defendant before obtaining a waiver, (3) whether the police coerced the defendant to change his mind, and (4) whether the subsequent waiver was knowing and voluntary.” *State v. Brown*, 158 Wn. App. 49, 58, 240

P.3d 1175 (2010) (citing *State v. Wheeler*, 108 Wn.2d 230, 238, 737 P.2d 1005 (1987)).

When determining whether a confession was coerced, courts look to the totality of the circumstances. *State v. Unga*, 165 Wn.2d 95, 100, 196 P.3d 645 (2008) (citing *Miranda v. Arizona*, 384 U.S. 436, 475-77, 86 S.Ct. 1602, 16 L.Ed.2d 694 (1966)). Relevant circumstances include police conduct, the location of the interrogation, and the defendant's mental health. *Unga*, 165 Wn.2d at 101.

Appellate courts review a trial court's findings of fact following a CrR 3.5 hearing for substantial evidence and review whether those findings support its conclusions of law de novo. *State v. Chambers*, 197 Wn. App. 96, 131, 387 P.3d 1108 (2016) (citing *State v. Radcliffe*, 164 Wn.2d 900, 907, 194 P.3d 250 (2008)). "Substantial evidence" is evidence sufficient to persuade a fair-minded and rational person of the truth of the finding. *State v. Grogan*, 147 Wn. App. 511, 516, 195 P.3d 1017 (2008) (citing *State v. Solomon*, 114 Wn. App. 781, 789, 60 P.3d 1215 (2002)).

The circumstances surrounding Ms. Wallace-Corff's waiver of her right to remain silent demonstrate that it was not a voluntary

waiver, but rather the product of coercion when she was confronted with the prospect of her children being placed with CPS if her ex-husband was arrested during the investigation. Even if the officers did not ask Ms. Wallace-Corff any questions related to the case before reading her *Miranda* rights a second time, the record shows that Ms. Wallace-Corff was made aware that the police were also investigating her ex-husband and the possibility that the gun used in the shooting was his. RP 34-35.

Ms. Wallace-Corff's ex-husband had custody of their children following her arrest, and the revelation that police were investigating him as the source of the gun made Ms. Wallace-Corff believe she had no choice to make a statement or risk her children being removed to foster care. RP 34.

Voluntary confessions are the product of a rational intellect and free will. *State v. Rupe*, 101 Wn.2d 664, 679, 683 P.2d 571 (1984) (citing *Mincey v. Arizona*, 437 U.S. 385, 398, 98 S.Ct. 2408, 57 L.Ed.2d 290 (1978)). The crucial question is whether the circumstances of the case show that the defendant's will to resist was overborne, leading them to provide a confession that was not freely self-determined. *State v. Cushing*, 68 Wn. App. 388, 392, 842

P.2d 1035 (1993) (quoting *State v. Riley*, 17 Wn. App. 732, 735, 565 P.2d 105 (1977)).

Up until the time the officers who had arrested Ms. Wallace-Corff discussed her ex-husband, she had unequivocally invoked her right to counsel and refused to answer questions. RP 15, 31; CP 95. It was only after Ms. Wallace-Corff felt the pressure of her children possibly having to experience both of their parents being arrested and being placed in state custody that her will to resist waiving her rights was overcome. In this way, her confession was not self-determined or the product of free will. Instead, the psychological pressure of possibly losing custody of her children overcame her original determination to exercise her rights.

This pressure on Ms. Wallace-Corff was exacerbated by the fact that she was detained at the police station, had been informed she was about to be transported to jail, and the significant fact that she suffers from mental health issues. Washington courts have recognized that police stations can constitute inherently coercive environments. See *State v. Bower*, 73 Wn.2d 634, 644, 440 P.2d 167 (1968). When this inherently coercive environment is combined with interrogation tactics that cause the defendant to feel compelled

to waive his or her rights out of fear rather than free will, the defendant's statements become involuntary and should be presumed inadmissible. *Cushing*, 68 Wn. App. at 392 (quoting *Rogers v. Richmond*, 365 U.S. 534, 544, 81 S.Ct. 735, 5 L.Ed.2d 760 (1961)).

In the coercive jail setting, Ms. Wallace-Corff steadfastly refused to talk to the police until she feared she would lose custody of her children. At that point, her will was overcome and she waived her rights. RP 16, 34. While the trial court found that “[t]here was nothing stated by Detective Shaw that prompted the defendant’s change of heart in giving a recorded statement at the Yakima Police Department after *Miranda* was re-read to her,” substantial evidence does not support this finding. The evidence establishes that coercive outside pressure, specifically the threat of losing her children, caused Ms. Wallace-Corff’s change of heart.

The remedy for a *Miranda* violation is the suppression of the unwarned statements at trial. *State v. Rhoden*, 189 Wn. App. 193, 199, 356 P.3d 242 (2015) (citing *State v. Hickman*, 157 Wn. App. 767, 772, 238 P.3d 1240 (2010)). Admitting statements in violation of *Miranda* can be harmless error, but the court must determine that

the error was harmless beyond a reasonable doubt because it implicates a constitutional right. *State v. France*, 121 Wn. App. 394, 400-01, 88 P.3d 1003 (2004) (citing *State v. Cervantes*, 62 Wn. App. 695, 701, 814 P.2d 1232 (1991)).

Under these circumstances, the error is presumed to be prejudicial and the state bears the burden of proving the error was harmless beyond a reasonable doubt. *State v. Guloy*, 104 Wn.2d 412, 425, 705 P.2d 1182 (1985). Such an error is only harmless if the untainted evidence is overwhelming enough to necessarily lead to a guilty verdict. *France*, 121 Wn. App. at 400-01 (citing *Cervantes*, 62 Wn. App. at 701).

The state cannot meet its burden of proving that the admission of Ms. Wallace-Corff's confession was harmless beyond a reasonable doubt because to establish her intent to inflict great bodily harm, the trial court relied on the fact that Ms. Wallace-Corff went to Ms. Hill's house with the intent to confront Mr. Whitaker about his infidelity, and that she picked up the gun from her ex-husband's house on the way. RP 230-31; CP 79-81. The only evidence establishing these two facts is Ms. Wallace-Corff's tainted confession. The error in admitting Ms. Wallace-Corff's recorded

statement was not harmless and warrants a new trial.

2. THE STATE FAILED TO PROVE
BEYOND A REASONABLE DOUBT
THAT MS. WALLACE-CORFF
INTENDED TO INFLICT GREAT
BODILY HARM

In evaluating the sufficiency of the evidence in a criminal case, the appellate court must determine “whether any rational fact finder could have found the elements of the crime beyond a reasonable doubt.” *State v. Homan*, 181 Wn.2d 102, 105, 330 P.3d 182 (2014) (citing *State v. Engel*, 166 Wn.2d 572, 576, 210 P.3d 1007 (2009)). “Specifically, following a bench trial, appellate review is limited to determining whether substantial evidence supports the findings of fact and, if so, whether the findings support the conclusions of law.” *Homan*, 181 Wn.2d at 105-06 (quoting *State v. Stevenson*, 128 Wn. App. 179, 193, 114 P.3d 699 (2005)).

Substantial evidence is evidence sufficient to “persuade a fair-minded person of the truth of the asserted premise.” *Homan*, 181 Wn.2d at 106 (citing *Stevenson*, 128 Wn. App. at 193). Challenges to a trial court’s conclusions of law are reviewed de novo. *Homan*, 181 Wn.2d at 106 (citing *State v. Gatewood*, 163 Wn.2d 534, 539, 182 P.3d 426 (2008)).

In relevant part, to convict a defendant of assault in the first degree, the state must prove beyond a reasonable doubt that (1) the defendant assaulted another person, (2) the assault was committed with a firearm or other deadly weapon, and (3) the defendant acted with the intent to inflict great bodily harm. RCW 9A.36.011(1)(a).

“Great bodily harm” is defined as “bodily injury which creates a probability of death, or which causes significant serious permanent disfigurement, or which causes a significant permanent loss or impairment of the function of any bodily part or organ.” RCW 9A.04.110(4)(c).

“The mens rea for first degree assault is the specific intent to inflict great bodily harm. Specific intent is defined as intent to produce a specific result, as opposed to intent to do the physical act that produces the result.” *State v. Elmi*, 166 Wn.2d 209, 215, 207 P.3d 439 (2009) (citing *State v. Wilson*, 125 Wn.2d 212, 218, 883 P.2d 320 (1994)). Specific intent cannot be presumed but can be inferred as a logical probability from all of the facts and circumstances present in the case. *State v. Pierre*, 108 Wn. App. 378, 386, 31 P.3d 1207 (2001) (citing *State v. Louthier*, 22 Wn.2d

497, 502, 156 P.2d 672 (1945)).

The evidence presented at Ms. Wallace-Corff's bench trial is insufficient to prove beyond a reasonable doubt that she specifically intended to inflict great bodily harm on Mr. Whitaker. Instead of retrieving the gun with the intent to shoot Mr. Whitaker, the evidence indicates that Ms. Wallace-Corff brought the gun to Ms. Hill's house out of fear that Ms. Hill would assault her for being in a relationship with Mr. Whitaker. CP 98. When Ms. Wallace-Corff arrived, she realized Ms. Hill was not angry with her and instead wanted to confront Mr. Whitaker about his infidelity. CP 98.

The evidence related to the shooting similarly fails to establish beyond a reasonable doubt that Ms. Wallace-Corff intended to inflict great bodily harm. Mr. Whitaker admitted that his recollection of the event was clouded by the fact that he was intoxicated and was woken up just before being shot. RP 157-59. His testimony describes Ms. Wallace-Corff shooting him in the leg as he attempted to get out of the bed. RP 158. According to Ms. Wallace-Corff, Mr. Whitaker stood up to reach for the gun and it accidentally discharged. CP 98.

Under either scenario, the evidence does not establish

beyond a reasonable doubt that Ms. Wallace-Corff intended to inflict permanent disfigurement or cause Mr. Whitaker to lose the function of any body part. The circumstances suggest that if she intended to inflict that level of injury, she could easily have done so by shooting Mr. Whitaker as he slept or somewhere other than his leg.

The remedy when an appellate court reverses for insufficient evidence is dismissal of the charge. *State v. Hickman*, 135 Wn.2d 97, 103, 954 P.2d 900 (1998) (Hickman II) (citing *State v. Hardesty*, 129 Wn.2d 303, 309, 915 P.2d 1080 (1996)). This court should reverse Ms. Wallace-Corff's conviction for assault in the first degree and order dismissal of the charge.

D. CONCLUSION

The outcome of Ms. Wallace-Corff's bench trial was tainted by the admission of a coerced confession that provided the state with substantive evidence of her guilt. The error was not harmless beyond a reasonable doubt, therefore Ms. Wallace-Corff requests that his court reverse her conviction and grant her a new trial. In the alternative, Ms. Wallace-Corff requests that his court reverse her conviction and order dismissal of the charge based on the state's

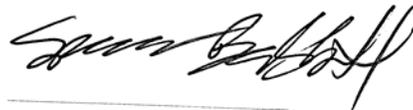
inability to prove the essential elements of assault in the first degree.

DATED this 30th day of October 2019.

Respectfully submitted,



LISE ELLNER, WSBA No. 20955
Attorney for Appellant



SPENCER BABBITT, WSBA No. 51076
Attorney for Appellant

I, Lise Ellner, a person over the age of 18 years of age, served the Yakima County Prosecutor's Office appeals@co.yakima.wa.us and Bethany Wallace-Corff/DOC#415550, Washington Corrections Center for Women, 9601 Bujacich Rd. NW, Gig Harbor, WA 98332 a true copy of the document to which this certificate is affixed on October 30, 2019. Service was made by electronically to the prosecutor and Bethany Wallace-Corff by depositing in the mails of the United States of America, properly stamped and addressed.



Signature

LAW OFFICES OF LISE ELLNER

October 29, 2019 - 8:19 PM

Transmittal Information

Filed with Court: Court of Appeals Division III
Appellate Court Case Number: 36809-2
Appellate Court Case Title: State of Washington v. Bethany B. Wallace-Corff
Superior Court Case Number: 15-1-00090-5

The following documents have been uploaded:

- 368092_Briefs_20191029201825D3192601_9696.pdf
This File Contains:
Briefs - Appellants
The Original File Name was Wallace-Corff AOB.pdf
- 368092_Designation_of_Clerks_Papers_20191029201825D3192601_4763.pdf
This File Contains:
Designation of Clerks Papers - Modifier: Supplemental
The Original File Name was Wallace-Corff Supplemental Designation of Clerks Papers.pdf
- 368092_Other_Filings_20191029201825D3192601_9934.pdf
This File Contains:
Other Filings - Appearance
The Original File Name was Wallace-Corff Notice of Appearance.pdf

A copy of the uploaded files will be sent to:

- David.Trefry@co.yakima.wa.us
- appeals@co.yakima.wa.us
- babbitts@seattleu.edu
- joseph.brusic@co.yakima.wa.us

Comments:

Sender Name: Lise Ellner - Email: liseellnerlaw@comcast.net
Address:
PO BOX 2711
VASHON, WA, 98070-2711
Phone: 206-930-1090

Note: The Filing Id is 20191029201825D3192601