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Court of Appeals
Division III
State of Washington
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No. 368220 - III

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

**JENS RICHTER, as an individual d/b/a GLOBAL EQUINE SIRES
and A-1 PERFORMANCE SIRES, Plaintiff/Appellant**

vs.

**ALLIE HELINSKI and BRENT HELINSKI, individually and the
marital community thereof,
Defendants/Respondents**

**APPEALED FROM SPOKANE COUNTY SUPERIOR COURT
CAUSE NO. 18-2-03782-9**

THE HONORABLE JULIE M. MCKAY

APPELLANT'S REPLY BRIEF

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I. INTRODUCTION

Respondents want this Court to create a new standard where a defendant (Respondents) simply must show they hired a lawyer to get relief from a default order and/or judgment. Respondents ask this Court to ignore the case law, court rules, facts and evidence and make an exception for their lawyer, Robert Sergeant, who failed to appear, answer or defend this lawsuit. Mr. Sergeant's failure to appear was not the result of a genuine misunderstanding, mistake, inadvertence, surprise or excusable neglect. Mr. Sergeant's failure to appear, answer or defend is unexplainable and inexcusable.

The trial court's decision to vacate Petitioner Jens Richter d/b/a Global Equine Sires and A-1 Performance Sires ("Richter") default orders and judgment is an abuse of discretion. The trial court found Mr. Sergeant failed to comply with the rules, the Respondents were not entitled to notice of the default, there was no informal appearance, and Mr. Sergeant's failure to appear or answer was inexcusable. Despite making all these findings, the trial court still vacated the default orders and judgement. This decision by the trial court is contrary to law. Therefore, Richter asks this Court to reinstate the orders of default and judgment.

II. ARGUMENT

A. The Facts and Evidence do not Support a Finding of Mistake, Inadvertence, Surprise, and/or Excusable Neglect under CR 60(b)(1).

The Respondents' failure to appear, answer or otherwise defend the lawsuit properly served upon them was not the result of a misunderstanding. Attorney Robert Sergeant simply failed to file a notice of appearance or answer on behalf of the Respondents at any time before Petitioner Jens Richter ("Richter") obtained default orders and ultimately a default judgment. Respondents cite Ha v. Signal Electric, Inc., 182 Wash. App. 436, 332 P.3d 991 (2014), in support of the trial court's decision to vacate Richter's default order and judgment, however, this case is clearly distinguishable from the present matter.

In Ha, the plaintiff was injured after she left a concert at the Showbox Seattle when she was struck by a vehicle in an intersection. Ha, 182 Wash. App. at 441-442. Ms. Ha filed a lawsuit naming multiple parties, including Signal Electric, Inc. ("Signal") an entity hired to install a traffic light at the crosswalk where Ms. Ha was injured. Id. After the lawsuit was filed, Signal filed for bankruptcy. Id. at 442. The lawsuit was served on Signal's bankruptcy attorney, forwarded to Signal's financial advisor, and through an error, provided to the wrong insurance company. Id. at 444. As a result of the lawsuit being provided to the wrong insurance

company, Signal failed to appear in the lawsuit, and default judgment for more than two million dollars was entered against Signal. Id. 445. Signal successfully moved to vacate the default judgment.

The default judgment was vacated because the failure to appear resulted from a genuine misunderstanding as to whether service should have been accepted by the bankruptcy attorney and the financial advisor's mistake in forwarding the lawsuit to the wrong insurance company. Id. at 452. There is no facts or evidence in this matter showing the failure to appear and defend the lawsuit was the result of a genuine misunderstanding as was the case in Ha. Id.

The facts and evidence in this matter show that Richter caused two letters and a lawsuit to be served upon Ms. Helinski, making her appearance and/or answer in the lawsuit due by September 20, 2018. CP 1-13; CP 211-212; CP 216. Sometime around September 15, 2018, Ms. Helinski allegedly met with Mr. Sergeant, who apparently agreed to represent the Respondents in the lawsuit. CP 142. At no time after meeting with Ms. Helinski did Mr. Sergeant ever file a notice of appearance or answer in the lawsuit on behalf of the Respondents. There is no facts or evidence in the record showing Mr. Sergeant's failure to appear or otherwise answer was the result of a misunderstanding or mistake.

In Washington, vacating defaults is justified where there is a genuine misunderstanding preventing the appearance or answer. Ha, 182 Wash. App. at 452. There are no facts or evidence showing a genuine misunderstanding, confusion over representation, or that someone other than the lawyer failed to properly forward the lawsuit to counsel, that the lawsuit was not provided to the correct counsel, that the lawsuit was not provided to the insurance company for defense, or that an insurance company failed to appear and defend its insured. See, White v. Holm, 73 Wash.2d 348, 438 P.2d 581 (1968) (holding default was properly vacated where there was a misunderstanding whether insurance would provide defense to lawsuit); Berger v. Dishman Dodge, Inc., 50 Wash. App. 309, 312, 748 P.2d 241 (1987) (holding default properly vacated where misunderstanding between insured and insurer as to who was responsible to answer the lawsuit); Ha v. Signal Electric, Inc., 182 Wash. App. 436, 332 P.3d 991 (2014) (holding default properly vacated where lawsuit was served on bankruptcy attorney, who provided lawsuit to financial advisor for company, who inadvertently provided lawsuit to wrong insurance carrier); Showalter v. Wild Oats, 124 Wash. App. 506, 101 P.3d 867 (2004) (holding default properly vacated where lawsuit was mistakenly not provided to counsel due to a request outside normal business practices).

Mr. Sergeant, for whatever reason, simply failed to comply with the Court Rules requiring a formal appearance and answer. CR 4(a)(2) & (3).

Where the failure to appear or answer is the result of neglect, such as here, vacating a default is improper. See, Johnson v. Cash Store, 116 Wash. App. 833, 848-849, 68 P.3d 1099 (2003) (holding default is proper where an employee's unexplained failure to forward summons and complaint to counsel resulted in a default); TMT Bear Creek Shopping Center, Inc. v. Petco Animal Supplies, Inc. 140 Wash. App. 191, 165 P.3d 1271 (2007) (default was proper where deadline to respond to lawsuit was not properly calendared and failure to enact policies to ensure counsel received notice of lawsuit); Beckman v. Dep't of Social & Health Servs., 102 Wash. App. 687, 11 P.3d 313 (2000) (neglect in failing to institute office management procedures to catch administrative errors was inexcusable); Priest v. Am. Bankers Life Assurance Co., 79 Wash. App. 93, 900 P.2d 595 (1995) (neglect inexcusable when summons and complaint were mislaid while general counsel was out of town). Washington courts will not relieve a defendant from a judgment due to a willful disregard of process, or due to inattention or neglect in a case. Commercial Courier Service, Inc. v. Miller, 13 Wash. App. 98, 106, 533 P.2d 852 (1975).

Similar to the above cited cases, Mr. Sergeant, in his business as a lawyer, failed to enact policies and procedures to ensure summons and complaints are responded to in a timely fashion. Where the failure to appear, answer or otherwise defend a lawsuit is unexplained or due to a breakdown in procedure, as is the case at present, the failure to respond is inexcusable. Johnson, 116 Wash. App. at 848-849; TMT Bear Creek Shopping Center, Inc., 140 Wash. App. at 212-213; Beckman, 102 Wash. App. at 695. The Appellate Court in Beckman found the following to constitute inexcusable neglect:

Capps' conduct impaired the State's timely filing of an appeal only because the Attorney General's Office lacked any reasonable procedure for calendaring hearings. The State's own internal investigation, which it asked us to consider, details the problems: The attorneys individually managed and calendared their own cases; the office had no central system for calendaring hearings; the staff was inexperienced and lacked training; there was no coordination between the responsible attorneys and no system for 'catching' administrative errors such as the one here.

Beckman, 102 Wash. App. at 695–96. Mr. Sergeant's failure to timely respond to the properly served summons and complaint was not the result of a genuine misunderstanding, but rather a failure to comply with legal process and a failure to enact procedures and policies. The failure to appear or answer in this matter is the result of inexcusable neglect.

If this Court were to entertain Respondents' argument that hiring a lawyer who fails to appear, answer or otherwise defend a lawsuit is

excusable neglect justifying vacating a default, it will render all court rules and case law requiring a formal appearance moot. Under CR 4(a)(3), a notice of appearance, “*shall be in writing, shall be signed by the defendant or his attorney, and shall be served upon the person whose name is signed on the summons.*” CR 4(a)(3). The Washington Supreme Court has stated, “*It appears to us that mere intent to defend, whether shown before or after a case is filed, is not enough; the defendant must go beyond merely acknowledging that a dispute exists and instead acknowledge that a dispute exists in court.*” Morin v. Burris, 160 Wash.2d 745, 756, 161 P.3d 956 (2007). Because litigation is inherently formal, the Washington Supreme Court has expressly rejected the adoption of the “informal appearance doctrine.” Id. at 757. “*Parties formally served by a summons and complaint must respond to the summons and complaint or suffer the consequences of a default judgment.*” Id.

Richter properly served the lawsuit on Respondents, and for whatever reason, Mr. Sergeant did not respond, therefore, Respondents must suffer the consequences of the default judgment. The trial court abused its discretion by vacating the default orders and default judgment because there was no mistake, inadvertence, surprise or excusable neglect present. Further, there was no genuine misunderstanding as required by the above cited case law. The defaults in this matter are the result of

inexcusable neglect, and the default orders and judgment should be reinstated.

B. The Decision in *Morin* is Inapplicable to this Case.

Respondents' reliance on *Morin v. Burris*, 160 Wash.2d 745, 750 (2007), is misplaced and is not applicable to the facts of this case. The trial court properly concluded that Mr. Sergeant did not do enough to substantially comply with the notice of appearance requirements. RP 23. The trial court also correctly concluded that because Mr. Sergeant failed to appear, that no notice of the default order was required. RP 23. This is not a case where there were any pre-litigation communications. All communications occurred after the lawsuit was properly served and a lawyer was retained to defend the lawsuit.

In *Morin*, Sheri Morin was involved in a motor vehicle accident with a vehicle insured by Farmers Insurance ("Farmers") on November 23, 1998. *Morin*, 160 Wash.2d at 750. On December 16, 1998, Ms. Morin was contacted by a claims adjuster from Farmers, was provided a check for property damages and informed the adjuster she was treating for injuries suffered in the accident. Id. Over the next three years, Ms. Morin and her counsel spoke with the Farmers' claims adjuster a total of three times regarding settlement of her claim. Id. After settlement negotiations failed to resolve the claim, a lawsuit was filed on November

2, 2001, and it was personally served on the insured on December 4, 2001 and served by publication on the driver on February 28, 2002. Id.

The Defendants did not respond in any way following service, and on May 24, 2002, Ms. Morin obtained a default order and on December 3, 2004, she obtained a default judgment. Id. at 750-751. On February 4, 2004, the defendants filed a motion to vacate the judgment arguing they had informally appeared in the case and should have been provided notice of the default prior to entry. Id. at 751. Both the trial court and Appellate Court determined the motion to vacate was proper because defendants had informally appeared.

In Matia, the Matia Investment Fund, Inc. (“Matia”) submitted a bid to buy a parcel of property owned by the City of Tacoma (“City”). Id. 752. After the required claim period passed, a lawsuit was filed by Matia against the City regarding the bid. Id. Matia served the City with the summons and complaint, and for whatever reason, the lawsuit was not forwarded to the City’s attorney for defense of the claim. Id. Because the City never answered or appeared in the lawsuit, Matia obtained a default without notice to the City. Id. The City successfully moved the trial court to vacate the judgment arguing an informal appearance, and the Appellate Court affirmed the trial court’s vacation of the judgment. Id.

Both Morin and Matia were appealed to the Supreme Court, and both cases were overturned because the Supreme Court found these defendants were not entitled to notice prior to default, there was no mistake, surprise, or excusable neglect, and that entry of the default was not inequitable. Id. at 757-758. In support of their holding the Washington Supreme Court stated:

When served with a summons and complaint, a party must appear. There must be some potential cost to encourage parties to acknowledge the court's jurisdiction. Substantial compliance will satisfy the notice of appearance requirement. However, we reject the argument that prelitigation communications alone may satisfy the appearance requirements of CR 4 and CR 55, and we decline to adopt the doctrine of informal appearance as formulated by the courts below. In the cases before us, the respondents in Morin and Matia failed to appear and have not shown other cause to set aside default judgment.

Id. at 759-760.

The above cases deal with pre-litigation communications and whether those communications require notice prior to entry of a default. This case is clearly distinguishable because there were no pre-litigation communications with Mr. Sergeant. There are no facts justifying Mr. Sergeant's failure to appear or answer required by court rule and case law. Any communications between Mr. Sergeant and counsel for Richter occurred after the default orders were entered against Respondents. Further, Richter's counsel specifically requested that Mr. Sergeant, "*please clarify*

who you represent in this matter,” because Mr. Sergeant had indicated he was helping a friend. CP 194-195; 199; CP 207. Mr. Sergeant never replied to this request for clarification, and in fact never communicated with Richter’s counsel ever again. CP 207.

Because Respondents failed to appear, answer or otherwise defend the lawsuit, they were not required to receive notice of the defaults. CR 55(a)(3). Respondents’ argument and case law regarding pre-litigation communications is inapplicable to this case and cannot justify vacating the default orders and default judgment. To the extent the trial court’s decision to vacate the default orders and default judgment is based on Respondents’ argument regarding pre-litigation communications, it is misplaced, should be reversed and the default orders and judgment should be reinstated.

C. Respondents Failed to Show a Defense to Richter’s Claims, and Litigation will be Pointless, as the Case will Result in a Judgment Against the Respondents.

The law requires the trial court review prima facie defenses in the light most favorable to the defendant, and reasonable inferences therefrom, because vacating a judgment will be pointless if the subsequent trial would result in another judgment in favor of the plaintiff. Rosander v. Nightrunners Transport, LTD, 147 Wash. App. 392, 406, 196 P.3d 711 (2008). The only evidence submitted in support of a defense by Respondents is the declaration of Respondent Allie Helinski. CP 139-144.

Ms. Helinski's declaration simply provides self-serving statements that she did not sell semen, and that the tank containing Richter's semen inventory failed. CP 139-144. This is not the type of evidence that is sufficient to establish even a prima facie defense to Richter's claims.

To set aside a default judgment, a defendant generally must submit affidavits identifying specific facts that support a prima facie defense. Shepard Ambulance, Inc. v. Helsell, Fetterman, Martin, Todd & Hokanson, 95 Wash.App. 231, 239, 974 P.2d 1275 (1999). Allegations or conclusory statements are insufficient. Id. "*The rule is well established that the existence of a fact or facts cannot rest in guess, speculation, or conjecture.*" Id. Similarly, the defendant must do more than present speculation regarding the existence of a defense. Little v. King, 160 Wash.2d 696, 705, 161 P.3d 345 (2007). "*[M]ere speculation is not substantial evidence of a defense.*" Id. The defendant must present "concrete facts" that support a defense. Ha at 449.

Richter asserted claims against Ms. Helinski and her marital community for: (1) breach of contract; (2) violation of the Consumer Protection Act; (3) tortious interference with a business expectancy; (4) fraud; (5) conversion; and (6) unjust enrichment. CP 3-11. These claims were asserted based on the fact that Ms. Helinski misrepresented to customers she was providing horse semen on behalf of Richter, took

money for unauthorized sales without providing the horse semen ordered and without providing Richter with the money received, altered semen straws to make customers believe they had received the horse semen they had ordered, and finally, took money from customers without providing any horse semen at all Id. Ms. Helinski also converted Richter's horse semen inventory, which was valued at \$295,000. CP 50; CP 66. Richter provided evidence to the trial court showing Ms. Helinski received money from customers from unauthorized sales, failed to provide customers with product, and fraudulently altered semen straws. CP 57-64; 68; 70. Richter also provided evidence of the value of the horse semen converted by Ms. Helinski. CP 50; CP 66.

The only evidence Ms. Helinski provided in defense of these claims was a declaration where she alleges, she did not convert the tank containing Richter's horse semen inventory. CP 139-148. Ms. Helinski never provided any evidence disputing the fraudulent sales, disputing the money she received from unauthorized sales, or showing that she was not responsible for Richter's horse semen inventory being destroyed. CP 139-148. The trial court did not examine all the claims asserted by Richter, rather the trial court made a cursory conclusion there was at least a prima facie defense to the claim of conversion based on Ms. Helinski's declaration stating she did not covert the horse semen. RP 24-25.

The evidence submitted by Ms. Helinski is not sufficient to establish even a prima facie defense. Based on the evidence submitted by Respondents, litigation of the claims asserted by Richter will be pointless, as a trial will result in a judgment against the Respondents. Rosander, 147 Wash. App. at 406.

Respondents failed to submit sufficient evidence to establish even a prima facie defense, therefore, the trial court abused its discretion and the orders of default and default judgment should be reinstated.

D. The Facts and Evidence do not Support the Trial Court's Decision to Vacate the Default Orders and Judgment Based on CR 60(b)(11).

Respondents' final argument appears to be a catch all based on CR 60(b)(11), for any other reason justifying relief from judgment. However, this argument ignores the standard for vacating default orders and judgments in Washington. As set forth above, the failure to appear and answer was not the result of a genuine misunderstanding, it was the result of inexcusable neglect. Mr. Sergeant was hired to represent the Respondents and for some unexplained reason, he never appeared, answered or otherwise defended the lawsuit. CR 4(a)(2)(3). Because litigation is inherently formal, the Washington Supreme Court has expressly rejected the adoption of the "informal appearance doctrine." Morin v. Burris, 160 Wash.2d 745, 757, 161 P.3d 956 (2007). "*Parties*

formally served by a summons and complaint must respond to the summons and complaint or suffer the consequences of a default judgment.” Id.

There are no facts or evidence in the record showing that Mr. Sergeant even appeared, or even attempted to communicate with Richter’s counsel prior to entry of default against Ms. Helenski. RP 22-23. Further, when Richter’s counsel requested that Mr. Sergeant specify who he represented in the lawsuit, he never communicated with Richter’s counsel again. CP 207. The facts and evidence show that Richter complied with the rules, and Respondents did not. There is no justification to allow the trial court’s decision to vacate the default orders and judgment.

This is not a situation where someone other than the lawyer failed to forward notice of the lawsuit, someone other than the lawyer failed to appear, or where there were pre-litigation communications between the parties prior to filing the lawsuit and the defaults being taken. Lawyers are required to follow the rules, and Respondents are asking this Court to ignore this requirement and make an exception where no exception exists. The Washington Supreme Court explicitly rejected the informal appearance doctrine. Morin v. Burris, 160 Wash.2d at 757. Mr. Sergeant had an obligation to appear, answer or otherwise defend the lawsuit on behalf of Respondents, and he did not. CR 4(a)(2) & (3). To allow Richter’s default orders and judgment to be vacated where a lawyer,

without explanation or genuine misunderstanding, failed to appear, answer or otherwise defend would be to render all applicable rules meaningless. Respondents want this Court to create a standard where, regardless of court rules, case law, facts or evidence, all a person must show is that they hired a lawyer in order to vacate a default order or judgment. This cannot be the standard.

Respondents are in an unfortunate situation, but it should not be remedied at the expense of Richter. There is no evidence showing there is a defense to the claims asserted and vacating the default orders and judgments is delaying an inevitable result. Reinstating the default orders and judgment does not leave Respondents without a remedy. The trial court abused its discretion by vacating the default orders and judgment, therefore they should be reinstated.

III. CONCLUSION

The Respondents want this Court to ignore court rules, case law, facts, and evidence and create a new standard for vacating default orders and judgments by making a simple showing that a lawyer was hired to defend the case. There is no explanation for why Mr. Sergeant failed to appear, answer or defend this lawsuit, and under the rules and case law this constitutes inexcusable neglect. Washington cannot create law where a

lawyer failing to follow court rules establishes a basis for defendants (Respondents) to get relief from default orders and judgments.

The trial court failed to find Mr. Sergeant's conduct was excusable, and Respondents failed to present evidence of at least a prima facie defense to Richter's claims. Therefore, the trial court abused its discretion in vacating the default orders and judgment, and they must be reinstated.

DATED this 4th day of November, 2019.

ROBERTS | FREEBOURN, PLLC

s/ Chad Freebourn

CHAD FREEBOURN, WSBA #35624
Attorney for Petitioner

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 4th day of November, 2019, I caused to be served via the Court of Appeal filing system a true and correct copy of the foregoing document to the following:

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