

FILED  
Court of Appeals  
Division III  
State of Washington  
1/17/2020 12:00 PM

No. 37165-4-III

COURT OF APPEALS, DIVISION III  
OF THE STATE OF WASHINGTON

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THE STATE OF WASHINGTON,

Respondent

v.

COREY JAVON WILLIAMS,

Appellant

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

NO. 15-1-01178-6

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BRIEF OF RESPONDENT

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## I. STATEMENT OF FACTS

**Substantive Facts:** The following is a timeline of key events.

April 8, 2013, to August 1, 2013: The defendant rented a residence at 1727 W. 15th, Kennewick, Washington, to Megan Dagal. CP 157; RP 02/17/2016 at 102-03. He had obtained a quit claim deed from the deceased owner's ex-wife. CP 157; RP 02/17/2016 at 102. The defendant pleaded guilty to Theft in the Second Degree. RP at 103.

August 1, 2013: The defendant rented a residence at 803 S. Tweedt, Kennewick, Washington, to a Nicole Bean and her family. CP 157. The property was in foreclosure and the defendant had no ownership interest in it. CP 157; RP 02/17/2016 at 103. The defendant pleaded guilty to Theft in the Second Degree. RP 02/17/2016 at 1-3.

August 4, 2013: The defendant rented a residence at 1921 W. 3rd, Kennewick, Washington, to a Correy Tallman. CP 157; RP 02/17/2016 at 104. The property had been in foreclosure and the legal owner had signed a quit claim deed transferring his interest to the defendant. CP 157; RP 02/17/2016 at 104. The defendant pleaded guilty to Theft in the Third Degree. RP 02/17/2016 at 104.

November 23, 2013: The defendant rented a residence at 520 N. Green, Kennewick, Washington, to Dustin and Amanda Motes. CP 157. The owner had filed bankruptcy and abandoned the house to the mortgage

holder; she did not know the defendant. CP 157. The defendant pleaded guilty to Theft in the Second Degree. RP 02/17/2016 at 103.

December 9, 2013: The defendant attempted to rent the property at 1727 W. 15th, Kennewick, Washington, to Dylan Clark. CP 157. The defendant pleaded guilty to Attempted Theft in the Second Degree. CP 157, 159; RP 02/17/2016 at 102.

December 10, 2013 (approximately): The defendant entered a residence at 5722 W. 15th, Kennewick, Washington. CP 156; RP 02/17/2016 at 101. The residence is owned by the Dominguez family, who reside in Florida. RP 02/17/2016 at 101. The defendant pleaded guilty to Criminal Trespass. RP 02/17/2016 at 101.

He rented this property to a Linda John, resulting in a conviction for Theft in the Second Degree. RP 02/17/2016 at 101-02.

The defendant objected to this evidence only because he was prosecuted under the name of Corey Javon Williams. RP 02/16/2016 at 6.

3 MR. WILLIAMS: First of all I object to the  
4 evidence that he has actually presented today. I believe  
5 he is aware that I presented evidence as far as actually  
6 my name is Corey Javon Pugh. The State is very familiar  
7 with the evidence that I have presented. I also want to  
8 hand him and the Court and address it, Your Honor, my  
9 motion to dismiss. The State is in violation of  
10 10.37.050, 6 and 7Crr Rule 2.11 and 2.

RP 02/16/2016 at 6.

September 16, 2015: The defendant filed a Claim of Lien on 523 N. Ely, Kennewick, Washington, as “The C. Williams Group,” listing “Corey Javon Pugh” as “commander and controller.” Ex. 8; RP 02/16/2016 at 85.

September 24, 2015: The Benton County PUD received a request to start utility services at 523 N. Ely, Kennewick, Washington, from “The C. Williams Group. LLC” with “Corey J. Pugh, Commander + Controller” listed as the business contact. Ex. 3; RP 02/16/2016 at 44, 47-48.

Contrary to the PUD policy, the PUD began service to this address, in part based on the defendant’s representation that he owned the property. RP 02/16/2016 at 44, 46.

September 29, 2015: The defendant signed a lease with Krista (Katlyn) Ironbear, as the landlord for 523 N. Ely, Kennewick, Washington. Ex. 1; RP 02/16/2016 at 64-65. Ms. Ironbear’s mother, Laura Gillette, paid the defendant \$1,800.00, which included \$1,000.00 for the first month and a deposit of \$800.00. RP 02/16/2016 at 25. The lease was for six months, followed by a month-to-month tenancy. Ex. 1 at 1; RP 02/16/2016 at 76.

The residence at 523 N. Ely was actually owned by Gail Timmins. RP 02/16/2016 at 58. Ms. Timmins lived in the residence from April 1983 to October 2013. RP 02/16/2016 at 14. After her husband passed away in

2007, she eventually found the house too expensive and left, believing that the mortgage holder would eventually foreclose. RP 02/16/2016 at 14-15.

She had never met the defendant, had not allowed anyone to enter the house, and had never heard the names Corey Williams or Pugh. RP

02/16/2016 at 16-17.

**Procedural Facts:** The key events procedurally are as follows.

February 16-17, 2016: Trial on the charges of two counts of Residential Burglary and one count of Theft in the Second Degree. The jury found the defendant guilty of Residential Burglary, Count I, Theft in the Second Degree, Count II, but not guilty of Residential Burglary, Count III.

February 22, 2016: The defendant filed a motion “Rule 7.4, Arrest of Judgment, (a)(3)(c)”, but he did not file a Note to the Motion Docket pursuant to Benton-Franklin Local Civil Rule

March 2, 2016: State filed a Response to this Motion, although the Motion was not heard.

March 2, 2016: The defendant filed a Notice of Appeal.

March 8, 2016: The defendant filed a “Supplement Motion to Arrest of Judgment.” Again, the defendant did not file a Note to the Motion Docket.

April 12, 2016: The defendant was sentenced by the Superior Court. During his sentencing, the defendant never mentioned that he had filed a Motion to Arrest Judgment. RP 04/12/2016 at 23-26.

May 3, 2018: The Court of Appeals, Division III, filed an unpublished opinion affirming the convictions.

November 14, 2018: A mandate was issued regarding the Court of Appeals decision.

January 8, 2019: The defendant filed a Motion for Arrest of Judgment, alleging “insufficiency of evidence.”

March 28, 2019: Findings of Fact and Conclusions of Law and Order on Defendant’s Motion to Arrest Judgment were entered.

April 22, 2019: The defendant filed a notice of appeal regarding the Order denying his Motion for Arrest of Judgment.

## II. ARGUMENT

### A. **Response to the defendant’s first argument: The defendant did not properly note his February 22, 2016 Motion to Arrest Judgment for a hearing.**

The local rules of the Superior Court for Benton-Franklin Counties require the moving party to file a note for the motion docket. LCR 7(b)(7)(A) attached as App. A. There is no obligation on a Superior Court Judge to review the Clerk’s file, determine if a party has filed a motion, ascertain if the parties are ready to argue the motion, and then set the

matter for a hearing. The defendant failed to properly note his motion, or bring it to the Court's attention, and he should not be allowed to complain about it at this point.

In any event, the defendant has had a substantive determination of the merits on his Motion. He appealed, arguing in part insufficiency of the evidence, and his convictions were affirmed. After the mandate was issued, he had a second bite at the apple and refiled his Motion for Arrest of Judgment. A Superior Court Judge denied that motion. The defendant has suffered no prejudice.

**B. Response to the defendant's second argument: The defendant is confusing the element of Residential Burglary that he unlawfully entered a residence with the intent to commit a crime on property there with the victim's knowledge of the unlawful entry.**

In ruling on the defendant's Motion to Arrest Judgment, the trial court noted that the Motion was based on the victim's having no knowledge he entered her residence. App. B. The Court concluded this was irrelevant. *Id.* The trial court did not modify the element that the defendant must unlawfully enter a residence with the intent to commit a crime on property therein.

**C. Response to the defendant's third argument: This was an issue on direct appeal and the Court correctly decided that an abandonment instruction was not appropriate.**

The Court of Appeals decision at pages 15-17 summarizes why the defendant's position is incorrect. The defendant has nothing new to add to his original argument on direct appeal.

**D. Response to the defendant's fourth argument: The issue is not properly before this Court, but the email from the customer service manager for the City of Kennewick to Detective Runge was disclosed.**

This is a direct appeal from the trial court's denial of the defendant's Motion for Arrest of Judgment. The Motion for Arrest of Judgment was not based on a *Brady* violation and CrR 7.4 does not provide a means to argue a discovery violation. The issue is not properly before this court.

The State will happily provide this Court with the police reports provided to the defendant if requested. However, the trial transcript provides a sufficient basis to rule on the defendant's argument. To recap, the defendant argues he was not provided an email from Evelyn Lusignan, the customer service manager for the City of Kennewick, to Det. Runge. The email is quoted on pages 21-22 of the defendant's brief.

First, it is difficult to see how this email was exculpatory, provided any assistance to the defendant, or was material. Second, while Det. Runge did not quote the email verbatim, Ms. Lusignan testified she notified him about her concerns regarding the defendant. RP 02/17/2016 at

121-22. The defendant did not raise any discovery violation objections to her testimony. The defendant was not shy in making claims about discovery violations. RP 02/17/2016 at 94.

To summarize, the State represents that it can establish the email referred to was noted in the police reports provided to the defendant. The State will not attempt to do so at this time because the argument is not properly before this Court. This is a direct appeal from an Order Denying the defendant's Motion for Arrest of Judgment. Nevertheless, the trial transcript shows Ms. Lusignan testified about her contacts with Det. Runge.

### **III. CONCLUSION**

The trial court properly denied the defendant's Motion to Arrest Judgment filed after a mandate was issued. On the Motion to Arrest Judgment filed in on February 22, 2016, the defendant did not properly note that for a hearing.

The trial court's decision to deny the Motion should be affirmed.

**RESPECTFULLY SUBMITTED** on January 17, 2020.

**ANDY MILLER**  
Prosecutor

A handwritten signature in black ink, appearing to read "Terry J. Bloor". The signature is written in a cursive style with a horizontal line underneath it.

Terry J. Bloor, Deputy  
Prosecuting Attorney  
Bar No. 9044  
OFC ID NO. 91004

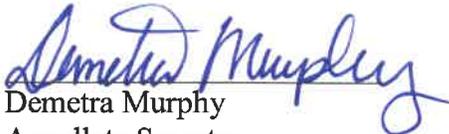
**CERTIFICATE OF SERVICE**

I certify under penalty of perjury under the laws of the State of Washington that on this day I served, in the manner indicated below, a true and correct copy of the foregoing document as follows:

Corey J. Williams #864621  
Coyote Ridge Corrections Center  
P.O. Box 769  
Connell, WA 99326

U.S. Regular Mail, Postage  
Prepaid

Signed at Kennewick, Washington on January 17, 2020.

  
Demetra Murphy  
Appellate Secretary

## **Appendices**

Appendix A: Benton County Local Civil Rule 7

Appendix B: 15-1-01178-6 Findings of Fact, Conclusions of Law and Order  
on Defendant's Motion to Arrest Judgement

Appendix A: Benton County Local Civil Rule 7

Local Civil Rule 7  
PLEADINGS ALLOWED; FORM OF MOTIONS

(b) Motions and Other Papers.

(1) Memorandum of Authorities and Affidavits Required.

(A) The moving party shall serve and file, with his or her motion a brief written statement of the motion and a brief memorandum containing reasons and citations of the authorities on which he or she relies. If the motion requires the consideration of facts not appearing of record, he or she shall also serve and file copies of all affidavits and photographic or other documentary evidence he or she intends to present in support of the motion. If the motion relies on facts in documents of record, the motion shall identify the document(s) and the date of filing of each document so identified. The motion shall be contained in a separate document from the Note for Motion Docket addressed in subsection (7) (A) hereinbelow. Bench copies shall be submitted as provided in LCR 5.

(B) Each party opposing the motion shall at least by noon, one (1) day prior to the argument, serve upon counsel for the moving party and upon counsel for all other parties, if the parties are represented, or upon all other parties if proceeding pro se, file with the Clerk a memorandum containing reasons and citations of the authorities upon which he or she relies, together with all affidavits and photographic or other documentary evidence he or she intends to present in opposition of the motion. If the opposition relies on facts in documents of record, the memorandum shall identify the document(s) and the date of filing of each document so identified. Bench copies shall be submitted as provided in LCR 5.

(2) Necessary Provision in Pleadings Relating to Supplemental Proceedings and Show Cause Hearings for Contempt. In all supplemental proceedings wherein an order is to be issued requiring the personal attendance of a party to be examined in open court, and in orders to show cause for contempt, the order must include the following words in capital letters:

YOUR FAILURE TO APPEAR AS ABOVE SET FORTH AT THE TIME, DATE, AND PLACE THEREOF WILL CAUSE THE COURT TO ISSUE A BENCH WARRANT FOR YOUR APPREHENSION AND CONFINEMENT IN JAIL UNTIL SUCH TIME AS THE MATTER CAN BE HEARD OR UNTIL BAIL IS POSTED.

No bench warrant will be issued in such cases for the apprehension of the cited person if such language has been omitted.

(3) Counsel Fees. Appointed counsel submitting motions for fixing or payment of fees and counsel requesting that the Court fix fees in any other case (except for temporary fees in domestic relation cases) should itemize their time, services rendered, or other detailed basis for the fees requested and attach a copy thereof to the motion.

(4) Action Required by Clerk. All documents filed with the Clerk, other than a note for the motion or trial dockets (see LCR 40) which require any action (other than filing) by the Clerk shall contain a motion in the caption specifying the nature of the document the words: "CLERK'S ACTION REQUIRED."

(5) Motion to Shorten Time. All motions to shorten time must be in writing and supported by declaration or affidavit that (a) states exigent circumstances or other compelling reasons why the matter must be heard on shortened time and (b) demonstrates due diligence in the manner and method by which notice, or attempted notice, was provided to all other parties regarding the presentation of the motion to shorten time. If the moving party, after showing due diligence, has been unable to notify all parties of the motion to shorten time, it is within the judicial officer's discretion to proceed with the motion to shorten time. The judicial officer shall indicate on the order shortening time the minimum amount of notice to be provided the responding party, which, barring extraordinary circumstances as set forth in the declaration or affidavit supporting the motion, shall not be less than 48 hours. The court file must be presented along with the motion to shorten time, declaration or affidavit, and the proposed order to the judicial officer considering the request.

(6) Document Format. Documents prepared for a judge's signature must contain at least two (2) lines of text on the signature page.

(7) Hearing of Motion Calendar.

(A) Note for Motion Docket. Any attorney desiring to bring any issue of law on for Hearing shall file with the Clerk and serve on all opposing counsel, not later than five (5) court days prior to the day on which the attorney desires it to be heard, a note for the motion docket which shall contain the title of the court, the cause number, a brief title of the cause, the date when the same shall be heard, the words "Note for Motion Docket," the name or names of each attorney involved in the matter, the nature of the motion, and by whom made. It shall be subscribed by the attorney filing the same and shall bear the designation of whom the attorney represents. The foregoing provisions shall not prohibit the hearing of written and/or oral emergency motions at the discretion of the Court on any docket.

(B) Over 10 Minutes for Hearing. If the moving party expects the motion to take more than ten (10) minutes to argue by all sides collectively, the movant shall designate on the note for motion docket that the matter is "over 10 minutes."

(C) Confirmation of Summary Judgment and Over-Ten-Minute Hearings. The moving party shall confirm with the clerk that summary judgment and over-ten-minute hearings will be heard on the date set during the following time periods:

i. Summary judgment and over-ten-minute hearings shall be confirmed in Benton County no sooner than Monday at 8:00 am and no later than Tuesday noon of the week in which the motion is noted for hearing.

ii. Summary judgment and over-ten-minute hearings shall be confirmed in Franklin County no sooner than Tuesday at 8:30 am and no later than Thursday noon of the week preceding the week in which the motion is noted for hearing. Confirmations may be by telephone, or by e-mail to the addresses stated below in LCR 7 (b) (7) (F).

iii. The clerk shall not allow more than a total of three (3) summary judgment and three (3) over-ten-minute

hearings to be confirmed for any one date. The maximum for such motions may be changed by resolution of the judges.

(D) Removal of Motion. If the note for motion docket, the motion and supporting factual materials and memorandum are not served, mailed, and filed as detailed in LCR 7, the Court may strike the same from the calendar.

(E) Service of Notice. The motion will not be heard unless there is on file proof of service of notice upon the attorney for the opposing party, or the opposing party if proceeding pro se, or there is an admission of service by opposing counsel or the opposing party if proceeding pro se.

(F) Continuance or Striking of Noted Motions by Parties. A matter noted on the motion docket may be continued pursuant to the following:

i. The moving party may strike or continue a motion at any time without cause with adequate notice to the opposing parties. Sanctions may be imposed if the opposing party's appearance at the hearing could have been avoided through due diligence of the moving party.

ii. Upon a showing of cause, the Court, in its discretion, may grant the non-moving party's request for a continuance.

iii. The party striking any matter may give notice to the non-moving parties by any means reasonably likely to provide actual notice. The clerk may be notified either by written notice or by e-mail notification. Notice to the Franklin County Clerk may be emailed to the following address: [civilclerk@co.franklin.wa.us](mailto:civilclerk@co.franklin.wa.us) for civil cases; and [domesticclerk@co.franklin.wa.us](mailto:domesticclerk@co.franklin.wa.us) for domestic cases. Notice to the Benton County Clerk may be emailed to the following address: [clerk@co.benton.wa.us](mailto:clerk@co.benton.wa.us).

iv. If the matter is stricken and the moving party desires a hearing, a new note for motion docket must be filed with the Clerk in accordance with section (A), above. Except for matters continued in open court, a new note for docket is required for motions that are continued.

(G) Calling Docket - Priority for Pro Bono Counsel. The causes on the civil docket for each motion day will be called in order, and the moving party, if no one appears in opposition, may take the order moved for upon proper proof of notice, unless the Court shall deem it unauthorized. In order to encourage participation in pro bono legal representation, all motions, where one or both parties are represented by pro bono counsel, shall, at the request of the pro bono attorney be given priority on the docket. Such priority shall be given without any reference as to the reason why. All parties are to appear in person.

(H) Continuances by Court. Any motion or hearing may be continued by the Court to a subsequent motion day or set down by the Court for hearing at another specified time, and the Court may alter the order of hearing as may be necessary to expedite the business of court.

(I) Frivolous Motions. Upon hearing any motion, if the Court is of the opinion that such motion is frivolous, or upon granting a continuance of any matter, terms may be imposed by the Court against the party filing such motion, or against the party at whose instance such continuance is granted.

(J) Ex Parte - Notice to Opposing Counsel. Lawyers should not ask the Court for ex parte orders without proper notice to opposing counsel, if counsel has appeared either formally or informally. This rule applies to temporary restraining orders and orders to show cause in domestic relations cases, as well as all other types of matters. (See Rule 65.)

(K) Decisions Without Oral Argument. Upon agreement of the parties, or upon request of the Court, a motion may be determined without oral argument. Matters may be noted for decision without oral argument only on the dates and times established for regular calendars. The moving party shall certify in the note for docket that every party has consented to determination without oral argument.

(L) Discovery Motions. The Court will not entertain any Motion or objection with respect to Rules 26, 27, 30, 31, 33, 34, 35 or 36, Civil Rules for Superior Court unless it affirmatively appears that counsel have met and conferred with respect thereto. Counsel for the moving or objecting party shall arrange such a conference. If the Court finds that counsel for any party, upon whom a Motion for an objection with respect to matters covered by such rules is served, willfully refused to meet and confer, or having met, willfully refused or fails to confer in good faith, the Court may take appropriate action to encourage future good faith compliance. In the event of an emergency, the Court will entertain Motion objections which would otherwise be governed by the above rule.

(M) Argument Limitations. Argument on the civil docket shall be limited to thirty (30) minutes per case.

[Adopted Effective April 1, 1986; Amended Effective August 1, 1990; September 1, 2002; September 1, 2009; September 1, 2011; September 1, 2013; September 2, 2014; September 1, 2015; September 1, 2016; September 1, 2017, September 1, 2018.]

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**Appendix B: 15-1-01178-6 Findings of Fact, Conclusions of Law and Order  
on Defendant's Motion to Arrest Judgement**

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IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON  
IN AND FOR THE COUNTY OF BENTON

STATE OF WASHINGTON,

Plaintiff,

vs.

COREY JAVON WILLIAMS,

Defendant.

NO. 15-1-01178-6

**FINDINGS OF FACT,  
CONCLUSIONS OF LAW AND  
ORDER ON DEFENDANT'S  
MOTION TO ARREST  
JUDGMENT**

**THIS MATTER** having come before the Court on the Defendant's Motion to Arrest Judgment, and the Court having reviewed the defendant's affidavit in support of the motion, including the attachments to that motion, and having read the State's Response to the Motion and Motion to Transfer the Matter to the Court of Appeals, and the Court having reviewed the files and records and decided the motion without oral argument, the Court makes the following Findings of Fact:

**FINDINGS OF FACT**

1. The defendant was found guilty via a jury trial of Residential Burglary and Theft in the Second Degree on February 17, 2016.
2. He was sentenced on April 12, 2016.
3. The defendant filed a direct appeal. The convictions were affirmed, and a Mandate was issued on November 14, 2018.
4. His current motion argues that there was insufficient evidence to support the conviction for Residential Burglary because the property was abandoned by the owner, Gail Timmins, that Ms. Timmins had no knowledge that the defendant entered onto the property and that the defendant had placed a lien of the property which gave him the right to possess the property under the Uniform Commercial Code (UCC).

From the above Findings of Fact, the Court makes the following:

## CONCLUSIONS OF LAW

1. The defendant's Motion to Arrest Judgment is not timely and is denied.
2. However, the Court will address the defendant's substantive arguments pursuant to CrR 7.8 or RCW 10.73.090.
3. The defendant's motion, if brought under CrR 7.8 or pursuant to RCW 10.73.090, would be timely.
4. To address the defendant's substantive arguments:
  - a) Whether Ms. Timmins abandoned the real property is irrelevant. She was still the owner of the property.
  - b) Whether she had knowledge that the defendant had entered the real property is irrelevant. The State must prove that the defendant had knowledge he was unlawfully entered property but not that the victim knew of the unlawful entry.
  - c) The Claim of Lien was filed under RCW 60.04, which is titled "Mechanics' and Materialmens' Liens." Such liens do not give the lien holder a right of possession. The UCC is not applicable.
5. The defendant has not made a substantial showing that he is entitled to relief.
6. Rather than transferring the motion to the Court of Appeals, this Court will deny the defendant's motion, which will allow him to appeal from this order if he so decides.

## ORDER

The defendant's motion to Arrest Judgment is denied as untimely. The Court has considered the merits of the defendant's motion as if it were a Personal Restraint Petition, and, while it is timely, it is denied. The State's motion to transfer the matter to the Court of Appeals is denied because the defendant may appeal from this Order.

DATED: <sup>March</sup> February 28, 2019.

  
BRUCE A. SPANNER, JUDGE

Presented by:

  
TERRY J. BLOOR, WSBA #9044  
Deputy Prosecuting Attorney  
OFC ID 91004

**BENTON COUNTY PROSECUTOR'S OFFICE**

**January 17, 2020 - 12:00 PM**

**Transmittal Information**

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