

82474-6

No. 36089-6

COURT OF APPEALS, DIVISION II
OF THE STATE OF WASHINGTON

GEORGE KELLEY, as guardian for BB, PB, and NB, minor children,

Appellant,

vs.

CENTENNIAL CONTRACTORS ENTERPRISES, INC.

Respondents.

OPENING BRIEF OF APPELLANT

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TABLE OF CONTENTS

I. ASSIGNMENT OF ERROR	1
Issues Pertaining to Assignment of Error	1
II. STATEMENT OF THE CASE.....	1
A. Phillip Blackshear Suffered Serious and Systemic Injuries as a Result of the Accident that Occurred During his Employment with Respondent/Defendants on April 7, 2003.....	3
B. The Constant and Unforeseen Delays in Mr. Blackshear’s Case.....	4
C. Four Days Prior to Trial, Mr. Blackshear Underwent Microdiscectomy, an Aggressive Surgical Procedure, to Alleviate his Severe Back Pain that Eventually Rendered him Permanently Disabled.	4
D. The Blackshears Faced Financial Ruin and Disaster and Tried Desperately to Hold On Until the Trial Outcome.....	6
E. Procedural History.	6
III. ARGUMENT.....	7
A. Standard of Review.....	8
B. The Trial Court Erred When It Determined that Appellants Failed to Show that it was Not Feasible to Join Their Loss of Consortium Claim with Mr. Blackshear’s Underlying Suit.....	10
1. Was there a reasonable assurance of success if the Appellants Blackshear minor children brought their loss of consortium claim with their parents’ underlying suit?	11
2. Was joinder of the Appellants Blackshear minor children’s claims possible or capable of being done?.....	12
C. The Trial Court Erred When It Rendered a Decision on a Moot Issue.	14
IV. CONCLUSION.....	17

TABLE OF AUTHORITIES

State Cases

<i>City of Bellevue v. Hellenthal</i> , 144 Wn.2d 425, 28 P.3d 744 (2001).....	10
<i>Dep't of Ecology v. Campbell & Gwinn, L.L.C.</i> , 146 Wn.2d 1, 43 P.3d 4 (2002).....	9
<i>Dioxin/Organochlorine Ctr. v. Pollution Control Hearings Bd.</i> , 131 Wn.2d 345, 352, 932 P.2d 158 (1997).....	10
<i>Gildon v. Simon Prop. Group, Inc.</i> , 158 Wn.2d 483, 145 P.3d 1196 (2006)	8
<i>Hibpshman v. Prudhoe Bay Supply, Inc.</i> , 734 P.2d 991 (Alaska 1987) ...	16
<i>Nevers v. Fireside, Inc.</i> , 133 Wn.2d 804, 947 P.2d 721 (1997).....	10
<i>Pinecrest Homeowners Ass'n v. Glen A. Cloninger & Assocs.</i> , 151 Wn.2d 279, 87 P.3d 1176 (2004).....	9
<i>Rest. Dev., Inc. v. Cananwill, Inc.</i> , 150 Wn.2d 674, 80 P.3d 598 (2003)...	9
<i>State v. Costich</i> , 152 Wn.2d 463, 98 P.3d 795 (2004).....	9
<i>State v. Turner</i> , 98 Wn.2d 731, 658 P.2d 658 (1983).....	15
<i>Ueland v. Reynolds Metals Co.</i> , 103 Wn.2d 131, 691 P.2d 190 (1984)1, 8,	10, 11, 14, 15,

Statutes

RCW 4.20.020	9
RCW 4.24.010	8

Federal Cases

Barber v. Cincinnati Bengals, Inc., 41 F.3d 553 (9th Cir. 1994) 15, 16
Huggins v. Sea Ins. Co. Ltd., 710 F. Supp. 243 (E.D. Wis. 1989)..... 15

Rules

BLACK'S LAW DICTIONARY (6th ed. 1990)..... 10
WEBSTER'S THIRD NEW INTERNATIONAL DICTIONARY (unabridged ed. 1967) 10

Court Rules

CR 19 8

I. ASSIGNMENTS OF ERROR

Assignment of Error

The trial court erred in granting the motion to dismiss of Respondents/Defendants on the basis of the Appellants/Plaintiffs Blackshear minor children failing to join their independent loss of consortium claim with the parents' underlying lawsuit pursuant to *Ueland v. Reynolds Metals Co.*, 103 Wn.2d 131, 691 P.2d 190 (1984).

Issues Pertaining to Assignment of Error

Whether for purposes of determining the dismissal of the Blackshear children's legally recognized claims for loss of consortium:

a) The trial court erred when it found that Blackshear children failed to show that joining their loss of consortium claim with the parents' underlying suit was feasible;

b) The trial court erred when it failed to find that Respondent's motion, which sought a retrospective and post-judgment determination of the feasibility of joining the Blackshear children's claims with the parents' underlying suit, was moot.

II. STATEMENT OF THE CASE

On April 6, 2005, Appellants minor children of Phillip and Monica Blackshear, knew and finally understood that their relationship with their father would forever be affected when he was rendered permanently

disabled as a result of an unfortunate accident. Two years ago, on April 7, 2003, Phillip Blackshear was transporting a 32,000 pound load of steel beams when the forklift operator lost control of one of the beams during the course of unloading them. A 1,000 pound beam fell off the forklift, struck Mr. Blackshear in the right leg, and pinned him against a stack of previously unloaded beams. Mr. Blackshear remained pinned under the beam for a quite a while before receiving assistance in lifting the steel beam from his leg.

Mr. Blackshear suffered severe injuries from being struck by the massive fallen beam. He has been to surgery and continuous treatment from a myriad of medical providers since that time. However, on September 8, 2005, just four (4) days prior to trial, Mr. Blackshear underwent lumbar fusion surgery as a final remedy of the constant and severe pain he suffered. And, seven (7) months later, after recovery failed and ailing effects surfaced, the Blackshear family knew that Mr. Blackshear would be permanently disabled.

This case represents the legal right of Appellants/Plaintiffs Blackshear children to bring a parental loss of consortium claim separate and apart from Phillip and Monica's underlying suit. From the time that doctors performed the hopeful lumbar fusion surgery until the time that Appellants filed their lawsuit, the Blackshear children's loss of consortium

claim had ripened. The sections below outline the Appellants' right to bring their claim.

A. Phillip Blackshear Suffered Serious and Systemic Injuries as a Result of the Accident that Occurred During his Employment with Respondent on April 7, 2003.

On April 7, 2003, Phillip Blackshear sustained significant injuries during the course of his employment with Respondent when a 1,000 pound beam fell off a forklift, struck him in the right leg, and pinned him against a stack of previously unloaded beams of the same size. Mr. Blackshear remained pinned under the beam for sometime before receiving assistance in lifting the steel beam from his leg.

Subsequent to the emergency care he received for the immediate trauma to his leg, Mr. Blackshear underwent several surgeries and treatments with his various care providers in order to repair or treat the injuries caused by the accident of April 7, 2003. Initially, Mr. Blackshear's care was provided by St. Clare Hospital before continuing treatment with his primary care physician, Arun Duggal, M.D. CP 47.¹ A series of surgeries then followed. On October 7, 2003, Mr. Blackshear underwent right shoulder surgery performed by orthopedic surgeon John Casey, M.D. CP 47. On November 22, 2004, Mr. Blackshear underwent right wrist surgery again performed by Dr. Casey. CP 48. On February

¹ References to Clerk's Papers herein will be designated "CP".

10, 2005, Mr. Blackshear underwent back surgery performed by neurosurgeon Benjamin Remington, M.D. CP 48.

B. The Constant and Unforeseen Delays in Mr. Blackshear's Case.

On March 29, 2004, Phillip and Monica Blackshear filed suit against Centennial Contractors Enterprises, Inc., the Respondent in this matter, for damages resulting from the accident of April 7, 2003. CP 10–13. Trial in that case was originally set for March 28, 2005. CP 17. Because of court congestion, trial was rescheduled to September 6, 2005. CP 7.² When trial, once again, failed to proceed on this second appointed date, Mr. Blackshear requested that trial begin on September 19, 2005, or a date certain as soon as practicable. CP 7. Trial in Mr. Blackshear's case eventually began on September 12, 2005. CP 7.

C. Four Days Prior to Trial, Mr. Blackshear Underwent Microdiscectomy, an Aggressive Surgical Procedure, to Alleviate his Severe Back Pain that Eventually Rendered him Permanently Disabled.

Trial was ultimately set to begin on September 12, 2005. From the time of the accident until the time of trial, Mr. Blackshear experienced some discomfort, but was able to interact with his wife and children even though he could not physically work. CP 63. Because physical therapy

² Although Daira S. Faltens, one of the attorneys for Respondent/Defendant, testified in her declaration that the second appointed trial date was September 6, 2007, this is likely a "typo" that should be corrected to reflect September 6, 2005. The other dates in September reflected in Ms. Faltens' declaration should also reflect a change in year from 2007 to 2005.

and other various treatments failed to alleviate the severe and persistent back pain suffered by Mr. Blackshear, Dr. Remington advised him that lumbar fusion surgery would help to relieve the pain and recommended that Mr. Blackshear have the procedure performed. CP 62.

On September 8, 2005, just four (4) days prior to the commencement of trial, Mr. Blackshear underwent microdiscectomy surgery on his back performed by Dr. Remington. Initial prognosis was that the surgical procedure successfully relieved the pain suffered by Mr. Blackshear and hopes for the Blackshear family were high. CP 63. But, after months of recovery, the Blackshear family's hopes diminished, and Mr. Blackshear, his wife, and his children had to collectively come to a realization about Mr. Blackshear's permanent disability:

I will never be able to provide for my family financially as I once did, that I will never be able to interact with my wife and children as we once did, and that I will never be able to give my children the love, support, care, attention, and companionship that we all seek and miss.

CP 63. Significantly, Mr. Blackshear's son, Appellant Phillip Blackshear, Jr., has childhood rheumatoid arthritis that requires 24-hour care and supervision. As a result of being rendered permanently disabled, Mr. Blackshear is physically unable to provide care for his disabled son, placing the colossal and emotional burden on Mrs. Blackshear. CP 63.

D. The Blackshears Faced Financial Ruin and Disaster and Tried Desperately to Hold On Until the Trial Outcome.

Mr. Blackshear was the sole wage earner for the family and had not worked since April 7, 2003, because of the physical injuries sustained as a result of the accident. CP 63. Although regular income failed to flow into the Blackshear home, debt continued to mount including day-to-day living expenses, monthly bills, and Mr. Blackshear's astronomical medical expenses. CP 63.

Until the judgment award, the Blackshear's found a way to survive for nearly two and a half (2 ½) years. The Blackshear family was able, at least for a limited time during this financial crisis, to rely on their savings that they were forced to completely exhaust. CP 63. When their savings had been depleted, the Blackshear family was forced to rely on extended credit to make ends meet until the lawsuit was resolved. CP 63. According to Mr. Blackshear, "Our financial situation was desperate and I am unsure how we would have made it if the judgment award did not come when it did." CP 63.

E. Procedural History.

On April 6, 2006, George Kelley, as guardian for Brittney Blackshear, Phillip Blackshear, Jr., and Nicholas Blackshear, filed suit in Pierce County Superior Court against Centennial Contractors Enterprises, Inc., for loss of consortium and respondeat superior. CP 7. On April 12,

2006, Appellants filed an amended complaint seeking damages for substantially the same claims.

Respondent eventually moved for summary judgment on the basis that Appellants “may not bring a separate consortium claim unless he or she can show why joinder with the parents’ underlying claim was not feasible.” CP 46.

On February 16, 2007, the trial court held oral argument on the pending motion for summary judgment, but was unable at that time to render a decision. VRP 1, 31.³ On February 21, 2007, a telephonic conference was held with the parties where the court made its decision. VRP 1. Although the court believed that “both sides have very persuasive arguments,” “the courts favor compensation for injured people,” and courts “don’t like to cut off claims,” it held that Appellants could not overcome the burden of the policy issue in determining feasibility—“multiplicitous litigation.” VRP 3.

This appeal follows. CP 1–2, 89–96.

III. ARGUMENT

The court below erred in multiple regards. Each of these issues is discussed in detail below.

³ References to Verbatim Report of Proceedings herein will be designated “VRP”.

A. Standard of Review.

This Court should review the trial court's interpretation of *Ueland v. Reynolds Metals Co.*, 103 Wn.2d 131, 691 P.2d 190 (1984), and its legal application to the facts of this case *de novo*. Although it is anticipated that Respondents will lobby this Court for an abuse of discretion standard based on analogy to a review of dismissal for failure to join pursuant to CR 19, this case mandates a review *de novo*. See *Gildon v. Simon Prop. Group, Inc.*, 158 Wn.2d 483, 493, 145 P.3d 1196 (2006). The trial court decided a question of law, not a question of fact. It determined what feasibility meant and its application to this case, to which the trial court decided that the Blackshear children could not bring their legally entitled claim because of a failure to show infeasibility.

A brief examination of the *Ueland* case settles the matter. In *Ueland*, plaintiff children filed a claim for loss of their father's consortium after he was injured by the negligence of defendant tortfeasor companies. The question in that case was whether children have a separate cause of action for loss of parental consortium when a parent is injured through the negligence of another. *Ueland*, 103 Wn.2d at 131. The court found that Parents may recover for loss of consortium for injury to a child (RCW 4.24.010); that a spouse may bring an action for loss of consortium when the other spouse is injured; and that a child, parent, or spouse can bring an action for wrongful death of the other where loss of consortium is an

element of the recovery (RCW 4.20.020). *Id.* at 133–34. However, it found the law in Washington sparse in answering the question before the court. *Id.* at 134. It reasoned that,

When justice requires, this court does not hesitate to expand the common law and recognize a cause of action. In the present case, just as in *Lundgren*, to defer to the Legislature in this instance would be to abdicate our responsibility to reform the common law to meet the evolving standards of justice.

Id. at 136. After discussion and analysis, the court expanded the reach of Washington statutes. The judicially crafted statute allowed for the following:

[A] child has an independent cause of action for loss of the love, care, companionship and guidance of a parent tortiously injured by a third party. This separate consortium claim must be joined with the parent's underlying claim unless the child can show why joinder was not feasible.

Id. at 140. Accordingly, review of a lower court's interpretation of a statute and application the facts of a case are reviewed *de novo* and not for an abuse of discretion.

This court reviews issues of statutory interpretation and claimed errors of law *de novo*. *Pinecrest Homeowners Ass'n v. Glen A. Cloninger & Assocs.*, 151 Wn.2d 279, 290, 87 P.3d 1176 (2004); *State v. Costich*, 152 Wn.2d 463, 469–70, 98 P.3d 795 (2004); *Rest. Dev., Inc. v. Cananwill, Inc.*, 150 Wn.2d 674, 681, 80 P.3d 598 (2003); *Dep't of Ecology v. Campbell & Gwinn, L.L.C.*, 146 Wn.2d 1, 9, 43 P.3d 4 (2002);

Dioxin/Organochlorine Ctr. v. Pollution Control Hearings Bd., 131 Wn.2d 345, 352, 932 P.2d 158 (1997). Similarly, interpretation of a court rule is a question of law, subject to *de novo* review. *Nevers v. Fireside, Inc.*, 133 Wn.2d 804, 809, 947 P.2d 721 (1997). In determining the meaning of a court rule, we apply the same principles used to determine the meaning of a statute. *City of Bellevue v. Hellenthal*, 144 Wn.2d 425, 431, 28 P.3d 744 (2001).

Because *Ueland* is a judicial extension of Washington statutory law and the issues before it arise from interpretation and application to the facts of this case, this Court must engage in a *de novo* review.

B. The Trial Court Erred When It Determined that Appellants Failed to Show that it was Not Feasible to Join Their Loss of Consortium Claim with Mr. Blackshear's Underlying Suit.

One of the issues before this Court is to determine that which was not fully defined by the *Ueland* court: what does "feasible" mean?

"Feasible," according to Black's Law Dictionary means "Capable of being done, executed, affected or accomplished. Reasonable assurance of success. *See Possible.*" BLACK'S LAW DICTIONARY 609 (6th ed. 1990). "Feasible" means not only possible, but also means "capable of being . . . utilized, or dealt with successfully." WEBSTER'S THIRD NEW INTERNATIONAL DICTIONARY 831 (unabridged ed. 1967).

Taking any one of these various definitions would demonstrate that Appellants have shown why joinder was not feasible under the *Ueland* rule.

1. Was there a reasonable assurance of success if the Blackshear children brought their loss of consortium claim with their parents' underlying suit?

The answer is no.

It was not feasible to join the Blackshear children's loss of consortium claim because the ultimate physical condition of Mr. Blackshear remained unknown at the close of trial until the Appellants filed suit on April 6, 2006. CP 63. Although Mr. Blackshear felt some discomfort, he was able to interact with his children. CP 63. Moreover, Dr. Remington's recommendation that Mr. Blackshear undergo the surgical procedure, microdiscectomy, was favorable and showed promise, giving the Blackshear family hope that the pain suffered by Mr. Blackshear would forever be resolved. CP 62. This is at odds with the trial court's reasoning when it stated, "There was never a time when Mr. Blackshear could have -- the plaintiffs could have said things are getting better, because they were always getting worse." VRP 3-4. Appellants simply would not have had a claim had the procedure resulted in a favorable outcome as Dr. Remington predicted.

Trial began on September 12, 2005, and Mr. Blackshear did not undergo surgery until just four (4) days prior to trial. CP 62-63. Only

after recuperating from surgery and allowing for recovery time, which meant some time after the adjudication of Mr. Blackshear's case, was it finally known that the surgery was unsuccessful and Mr. Blackshear was rendered permanently disabled. CP 63. Had the Blackshear children brought suit with their parents' claims, there simply was not enough factual evidence to support a favorable finding or award, let alone enough to defend a motion for summary judgment that would have likely been brought by Respondents.

The Blackshear children brought their independent cause of action as soon as practicable and within a short period of time—approximately seven (7) months from Mr. Blackshear's surgery of September 8, 2005—to assert their claims when his health could be more accurately measured and their losses reasonably determined. CP 63, 70–76. The Blackshear children were faced with the reality that their father will never be able to work and provide for them, will never be able to participate in activities with them as he once did, will never be able to love and care for them as they may want him to (especially Phillip Blackshear, Jr.), and other joys that children with non-disabled parents take for granted. CP 63.

2. Was joinder of the Blackshear children's claims possible or capable of being done?

The answer is no.

It was not feasible to join the Blackshear children's loss of consortium claim because doing so would have further delayed the Blackshear family's receipt of their judgment award and would have guaranteed their financial collapse. CP 63. The timing for joining Appellants' claim did not arise until after the adjudication of their parents' suit: the various medical treatment and procedures showed promise that he would fully recover and they family was able to stay financially afloat until the trial date of September 12, 2005. This, again, is at odds with the trial court's reasoning when it stated, "Mr. Blackshear, the father, never went back to work, so by the time the original lawsuit was filed he'd been out of work for nearly a year. Certainly, the financial hardship issue would have presented itself by that time." VRP 3. Appellants would not have had a legitimate claim at that time because Mr. Blackshear's condition was progressing and one final surgical procedure showed promise of a full recovery. The decision that the Blackshear family was faced with was whether to join the Appellants' claim at or around the time that Mr. Blackshear underwent the microdiscectomy on September 8, 2005. Without question, this decision would have delayed the trial even further.

The Blackshear family was already under extreme financial distress as a result of the various trial delays due to court congestion. CP 63. The Blackshear family's savings were gone and they had exhausted all available credit resources. CP 63. After the second trial delay, Mr.

Blackshear requested that trial begin on September 19, 2005, or a date certain as soon as practicable because they could not financially hold out any longer. CP 7, 63. The Blackshear family faced financial peril in light of their mounting debt without any inflow of cash, and as Mr. Blackshear stated, "I am unsure how we would have made it if the judgment award did not come when it did." CP 63. Joining the Appellants' claims at that late juncture would have sealed the financial fate of the Blackshear family.

The factual circumstances and situations offered to the trial court by the Blackshear children as to why joinder with their parent's underlying suit was not feasible satisfied the *Ueland* rule. As a matter of fact, the trial court stated the following when it made its ruling:

Those are all -- both sides have very persuasive arguments, and it just gets down to a policy issue, I suppose.

VRP 2.

C. The Trial Court Erred When It Rendered a Decision on a Moot Issue.

Respondent's main assertion was that the Appellants' claims should have been joined in their injured parents' prior lawsuit. Making assertions about what "should" have been done or what "could" have happened about past and prior events is baseless, and to argue about something over which this Court cannot decide or remedy renders an issue moot. A question is moot if the court cannot provide meaningful

relief to the parties. *State v. Turner*, 98 Wn.2d 731, 733, 658 P.2d 658 (1983).

The spirit of the *Ueland* joinder rule assumes that doing so is possible, even feasible. The *Ueland* court, which recognizes an independent cause of action for loss of parental consortium, emphasized that “the children’s claims for loss of parental consortium must be joined with the injured parent’s claim whenever feasible.” *Id.* at 137. Respondent’s position is that because joinder *was* allegedly feasible *before*, Appellants’ claims are now barred—in essence, a retroactive application that should result in consequences to the current situation. Because this Court can take no action and provide no relief (i.e., order that the children be made parties to the underlying action or dismiss the children from the underlying action), Respondent’s position is moot and the trial court should not have rendered a decision.

Case law lends support to this position. In *Barber v. Cincinnati Bengals, Inc.*, 41 F.3d 553 (9th Cir. 1994), a loss of parental consortium case, the court remanded the case back to the trial court to make a determination of whether joinder of the children’s claims with the father’s underlying personal injury claim was feasible “**since that [underlying] matter is still pending.**” *Id.* at 558. The court distinguished the case from that of *Huggins v. Sea Ins. Co. Ltd.*, 710 F. Supp. 243 (E.D. Wis. 1989), and stated the following:

In *Huggins*, the claim for loss of parental consortium was filed *after* judgment on the merits had been entered in the parent's underlying tort action. *Id.* at 245. For that reason, the claim for loss of parental consortium could not be joined because a final judgment on the merits of the parent's action had been entered. The record in Crytzer's action shows that her personal injury claims are still pending in the district court. The district court's conclusion that joinder was no longer feasible was based on its erroneous assumption that a final judgment dismissing Crytzer's personal injury claims had been entered.

Barber, 41 F.3d at 557 (emphasis in original). It is transparent that the court observed joinder was not only infeasible, but not even something to be considered where judgment on the underlying action had already been accomplished. *See also Hibpshman v. Prudhoe Bay Supply, Inc.*, 734 P.2d 991, 997 (Alaska 1987) (adopting a test identical to Washington's, the court reasoned, "Except in special cases that render it impossible for the parties to bring suit together, joinder appears to be a practical and fair solution to the problem and in our view is mandatory"). Similarly, Appellants properly filed suit when their claims arose, which occurred after the underlying suit had been adjudged. Issues of feasibility are moot.

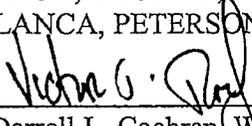
IV. CONCLUSION

Respectfully submitted.

Dated this 24th day of September, 2007.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I, Kim Snyder, certify under penalty of perjury under the laws of the State of Washington that the following is true and correct:

A. I am a United States Citizen, over the age of 18 years, not a party to this cause, and competent to testify to the matters set forth herein.

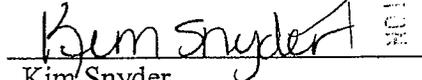
B. I am employed by the law firm of Gordon, Thomas, Honeywell, Malanca, Peterson & Daheim LLP, 1201 Pacific Avenue, Suite 2100, Tacoma, Washington 98401, attorneys for plaintiff/appellant.

C. On September 24, 2007, I caused a copy of the *Brief of Appellant* to be served upon the following:

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