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Supreme Court Case No. 89533-3

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SUPREME COURT OF THE STATE OF WASHINGTON

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CRYSTAL RIDGE HOMEOWNERS ASSOCIATION, a Washington  
nonprofit corporation, et al.,

Respondents,

v.

CITY OF BOTHELL, a Washington municipal corporation,

Petitioner.

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AMICUS CURIAE BRIEF OF WASHINGTON STATE ASSOCIATION  
OF MUNICIPAL ATTORNEYS IN SUPPORT OF CITY OF BOTHELL

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Filed *E*  
Washington State Supreme Court

MAY 20 2014

*by h*  
Ronald R. Carpenter  
Clerk

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ORIGINAL

**TABLE OF CONTENTS**

I. IDENTITY OF AMICUS CURRIAE.....1

II. STATEMENT OF THE CASE.....1

III. ARGUMENT .....1

    A. Introduction.....1

    B. The Hearing Examiner Did NOT Require the Developer to Deed the Interceptor Pipe to the County; and DID Require the Developer to Record a Drainage Disclosure.....4

    C. The Drainage Disclosure Applies to the Entire Plat, Including Tract 999 .....5

    D. The Snohomish County Codes Under Which the Plat was approved Did Not Require the County to Take over the Ground Water Facility.....7

    E. The Ground Water Facility is Located Wholly on Private Property and Surrounded by Private Property .....8

    F. The Dedication Statute Does Not Require any Finding that a Buried Ground Water Pipe that is Not Depicted on a Plat Map has Automatically been Included in a Public Dedication .....9

    G. Evidentiary Issue.....11

IV. CONCLUSION.....14

**Appendix 1**

Copy of **Drainage Disclosure** (Snohomish County Recording No. 8711090361).

**TABLE OF AUTHORITIES**

**Cases**

*Vallandigham v. Clover Park Sch. Dist.*, 154 Wn.2d 16, 26, 109 P.3d 805  
(2005)..... 11

**Statutes**

RCW 4.16.310 .....2  
SCC 24.16.160(3)(d).....8

## **I. IDENTITY OF AMICUS CURIAE**

Amicus is the Washington State Association of Municipal Attorneys, the organization of municipal attorneys representing the cities and towns across the State (hereinafter referred to as "WSAMA").

## **II. STATEMENT OF THE CASE**

WSAMA adopts the Introductory Statement and Statement of the Case submitted by the Petitioner, City of Bothell (hereinafter "Bothell").

Amicus also notes that Bothell did a good job of identifying authorities for its arguments, leaving less, in the way of citation to authorities needed from Amicus.<sup>1</sup>

## **III. ARGUMENT**

### **A. Introduction.**

This case involves a variety of important issues; issues of first impression that effect every city and county in the state. In this regard, Amicus endorses the arguments previously made by the City of Bothell. Amicus also notes that this case could affect the taxpayers of every local jurisdiction in Washington and every developer of residential neighborhoods in this state. Accordingly, the effects of this case are vast and have consequences for more than just the state's cities and counties. If Bothell becomes responsible for a groundwater facility over which neither

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<sup>1</sup> For the purposes of identifying the Respondents, Amicus refers to them as Plaintiff or Plaintiffs.

it nor Snohomish County had direct knowledge and did not expressly accept - just because it exists - that same thing could happen to any county, city or town. The result will be to impose a challenge on what counties, cities and towns do when processing applications for developments to make sure they realize what long-term obligations may be foisted upon them and their taxpayers when ground-water needs are not adequately addressed by the developers or property owners of a development.

There are several issues involving this case that are of significant importance to local jurisdictions and to their citizens and taxpayers. First, this Court is being asked to decide, indirectly, what responsibilities the local jurisdiction has when groundwater facilities that benefit private development (versus surface water facilities) have not been adequately addressed during the development process or are failing due to age and lack of maintenance; secondly, this Court is being asked to impose upon local jurisdictions, and their citizens and taxpayers, liability for failing ground water drainage facilities long after the statutes of limitations and the 6-year Washington State statute of repose, RCW 4.16.310, has expired for potential actions against a developer, making them the ultimate insurers of private ground water drainage facilities in a residential plat; and thirdly, by making the local jurisdictions, and their citizens and

taxpayers, the ultimate insurers of private ground water drainage facilities in a residential plat, an outcome that would impose upon the citizens and taxpayers of local jurisdictions financial obligations for facilities that do not directly benefit the local jurisdictions and for which the local jurisdictions have had no role in inspecting, operating or – most importantly – maintaining.

If the citizens and taxpayers of cities and counties were to become responsible for subsurface groundwater drainage issues that were not adequately addressed during the development process, the result would be that those same citizens and taxpayers would have to pay significantly increased costs for unknown groundwater facilities, long after residential plats been developed, inadequate facilities installed and, potentially, developers have moved on. While the developers are insulated from liability by the legislature's enactment of statutory limitations of action, and even a 6-year statutory period of repose, the Plaintiffs are urging the Court to ignore all statutory safe harbors and hold the local jurisdiction liable and responsible for all their private ground water problems. Not only should the Court decline to impose such a rule generally, but here, in this case, where each Plaintiff purchased their property subject to a Recorded Drainage disclosure specifically advising them of their obligation to install special drainage features on their own private lots in

the future to protect their properties from excessive groundwater conditions, Plaintiffs' request to hold the City of Bothell responsible for their ground water flooding problems should be denied.

**B. The Hearing Examiner Did NOT Require The Developer to Deed the Interceptor Pipe to the County; and DID Require the Developer to Record a Drainage Disclosure.**

Amicus has reviewed the Decision of the Hearing Examiner, *CP 719-728*, and nowhere in that Decision did he require the Developer to dedicate the interceptor pipe to Snohomish County. In fact, his intent is quite to the contrary. Instead, when Snohomish County was reviewing the plat, the Hearing Examiner recognized that, due to the excessive ground water issues with this site, the (future) property owners would be required to take extraordinary measures to address subsurface drainage problems on their own private properties. The Examiner wanted the Developer to make sure that this was a condition that each purchaser in Crystal Ridge knew about, and that it was a condition that ran with the land. Thus, the Hearing Examiner required that the Developer file a Drainage Disclosure, a copy of which is attached hereto as **Appendix 1**, with regard to “any portion of the subject property”:

Prior to recording of the final plat the applicant shall have filed and recorded with the county Auditor a document, . . . which discloses the fact that substantial surface and subsurface drainage controls have been necessary in the development of the subject property and that special and/or

extraordinary drainage controls may be necessary on individual lots. Said document shall be recorded in such a fashion as to be included in any title search conducted regarding any portion of the subject property.

CP 727; *Examiner's 1984 Decision*, Condition J(iv) (emphasis added).

For some reason the Court of Appeals thought the Disclosure should just be considered “notice” to the property owners. But that ignores the fact that a prior document that would have served as merely “notice” was prepared by the Developer and rejected by the County. CP 469-470. And it ignores the plain language of the actual recorded Disclosure. **App. 1;** *and see below, infra, Sec. C.* At an absolute minimum, any doubts about the Examiner’s requirements (CP 727), the first rejected disclosure (CP 469-470), and the final Recorded Drainage Disclosure (App. 1) should have been resolved in favor of the City as the nonmoving party. On this record, Plaintiffs’ summary judgment should not have been granted.

**C. The Drainage Disclosure Applies to the Entire Plat, Including Tract 999.**

The property description included with the Drainage Disclosure identifies the entire plat of Crystal Ridge, Div. II – including Tract 999, where the interceptor pipe is located. Plaintiffs’ claim that the Drainage Disclosure applies only to “individual residential lots” – and specifically excludes Tract 999 – is a blatant factual misrepresentation of the Record. Amicus believes the fact that the Drainage Disclosure applies to all of the

plat, including Tract 999, is crucial. And, in reviewing the Record, it is a fact that was gravely mistaken by the trial court – based upon Plaintiffs’ misrepresentations – *and* this misrepresentation unduly influenced the trial court’s decision. *See*, for instance, the transcript of the trial court’s oral decision, at CP’s 172 and 176, where the trial judge indicated that the Disclosure does not apply because he thinks the interceptor pipe is not located on an “individual lot,” because it is located on Tract 999, which is a lot that is not owned by an “individual”:

[T]hat tract **[Tract 999] was not owned by any particular individual**, rather it was a tract which was reserved along with certain other tracts to be held by the homeowner’s association.

*(CP 172)(Emphasis added.)*

\* \* \*

The city has argued that the disclosure statement that was required on the deeds of the purchasers detracts from the county accepting responsibility for the interceptor [sic] drainage system. I don’t believe that the disclosure to the individual lot owners that they may be responsible for their individual drainage problem detracts from this situation. **This particular drainage facility was not on any individual lot. It was, as I indicated, on a lot that was held in common by the homeowner’s association.** There was nothing in the disclosure statement to refer to the fact that the homeowner’s association and/or the individual would be responsible for that particular drainage facility.

*(CP 176)(Emphasis added.)*

In the Drainage Disclosure, the definition of “individual lots” does

not – CANNOT as a matter of law or common sense – mean “lots owned by individuals” as the trial court held. Amicus is amazed that the court was persuaded by Plaintiffs to accept this faulty definition. Instead, an “individual lot” is a *singular* lot; it is a *separate* lot; it is *one (1)* lot. Whether or not a lot is an “individual lot” has nothing to do with who owns it. Tract 999 is only one (1) lot – whether it is owned by one person or the entire homeowners association. Tract 999 is an individual lot covered by the Drainage Disclosure. This finding is consistent with the plain language of the Disclosure and the intent of the Snohomish County Hearing Examiner when he approved Crystal Ridge. Furthermore, at the very least, any ambiguity with regard to this issue should again have been resolved in the light most favorable to the City as the non-moving party, and Plaintiffs’ motion for summary judgment should not have been granted.

**D. The Snohomish County Codes Under Which the Plat was Approved Did Not Require the County To Take over the Ground Water Facility.**

The Snohomish County codes under which the Crystal Ridge plat was approved did not anticipate or require that the County take over responsibility for private residential drainage facilities (either storm water or, especially, ground water) after construction and approval. For instance, the former Snohomish County Code (SCC) indicates that the developer

must have a “[p]roposed method of ensuring long-term operation and maintenance of drainage improvements and facilities.” (SCC 24.16.160(3)(d) - Detailed Drainage Plan-Contents) CP 679-680. This is contrary to an intent to take over facilities. *See, e.g., City’s Briefing (Reply Brief of Appellant, Court of Appeals, Div. I, pp. 5-13, incorporated herein by reference)*. And, specifically, in this case, rather than intending to take over the buried interceptor pipe, the Hearing Examiner instead required the Developer to prepare and record the Drainage Disclosure. Again, this provision of the Examiner’s Decision indicates that the County did NOT intend to take over the buried ground water facilities at Crystal Ridge.

**E. The Ground Water Facility is Located Wholly on Private Property and Surrounded by Private Property.**

Also important is the fact that the facility Plaintiffs seek to have the public - the citizens and taxpayers of the City of Bothell - assume is not on public property or even adjacent to public property. The interceptor pipe is wholly located on *private property* and, further, surrounded by *private property*, and it does not even discharge into the public storm water system, but discharges into a *private pond on private property*. The Hearing Examiner for Snohomish County knew this; and these fact are further evidence that he did not intend for the County to take over this facility.

The City annexed this property in 1992. As evidence that the City did not intend to take over facilities located wholly on private property at that time,<sup>2</sup> the Court can take note of the fact that in April, 1997, the City of Bothell passed an ordinance establishing a surface water runoff policy for the City of Bothell authorizing the City's assumption of drainage facilities on public lands. (CP 562-568 – City of Bothell Ord. No. 843.) It did not apply across the board to the assumption of all drainage facilities, but only provided for the assumption of facilities on public lands rather than private property. Specifically, this ordinance only provided for the City's assumption of facilities located on public property or in public rights-of-way and, in fact, provided that the City would not assume responsibility for maintenance of facilities on private property. *Id.* Yet, the Petitioners are asking this Court to impose on the City, and, likewise, impose on other local jurisdictions across the state, the obligation to take on private facilities on private property.

**F. The Dedication Statute Does Not Require Any Finding That A Buried Ground Water Pipe That is Not Depicted On A Plat Map Has Automatically Been Included In a Public Dedication.**

Curiously, the trial court judge recited from the language of the

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<sup>2</sup> Amicus contends the record is clear that Snohomish County did not intend to take over the ground water pipe in 1987. To the extent this Court considers what Bothell *intended* when it annexed the property in 1992, amicus submits that the City's 1997 ordinance (CP 562-568), where it steadfastly refuses to take over private facilities on private property, is relevant to show that the City could not have been "intending" to take over a private facility -- such as the interceptor pipe -- when it annexed Crystal Ridge in 1992.

dedication statute, RCW 58.17.020, to support his finding that the interceptor pipe had automatically been dedicated to Snohomish County on the face of the plat, even though it does not appear anywhere on the plat. The statute reads:

Dedication is the deliberate appropriation of land by an owner for any general and public uses reserving to himself or herself no other rights than such as are compatible with the full exercise and enjoyment to the public uses to which the property has been devoted the intent to dedicate shall be evidenced by the owner by the presentation for filing of a final plat or short plat showing the dedication thereon and the acceptance by the public shall be evidenced by the approval of such plat for filing by the appropriate governmental unit. (Emphasis added.)

(CP 174) This citation by the trial court is curious because amicus could find nothing in the record that indicates this statute applies to the dedication of the ground water facilities at the center of this case; the dedication statute clearly relates to the dedication of "land," not buried ground water facilities on private property. Citation to the dedication statute is meaningless here. The issue in this case, which is one of first impression, is the scope of a drainage easement under the dedication statute, and whether it includes private ground water facilities that (1) are not depicted on the plat drawing; (2) are located wholly on private property and drain to a private pond on adjacent private property; and (3) do not directly benefit public infrastructure.

Amicus points out that Plaintiffs cited to no Washington cases in support of their interpretation of the dedication statute. The City has, however, provided this Court with persuasive out-of-state authority in support of its position; *i.e.*, other states courts have held that where a private drainage pipe is not depicted on a plat map – even where that map contains a dedication of a “public” drainage easement – the un-depicted private drainage pipe is NOT part of the public easement. *See City’s Petition for Review*, pp.18-20, incorporated herein by reference. **Plaintiffs did not submit any authority (in-state or out-of-state) to the contrary.** Thus, it appears that the weight of authority is in the City’s favor. Amicus agrees with that authority and asks the Court to give it careful consideration in this matter.

**G. Evidentiary Issue.**

The trial court granted Plaintiffs Crystal Ridge’s motion for summary judgment, which means that it should have viewed all the evidence and inferences from the evidence in the light most favorable to the City as the non-moving party. *Vallandigham v. Clover Park Sch. Dist.*, 154 Wn.2d 16, 26, 109 P.3d 805 (2005). It is clear to amicus that this did not occur. While burdens can be confusing when the parties file cross-motions, as the parties did in this case, still, the trial court must, ultimately, apply the correct burden of proof to its final decision.

Here, for instance, the trial court did not view the supposed “evidence” of whether Snohomish County intended to take over the interceptor pipe in the light most favorable to the City as the nonmoving party. First, it is undisputed that the Hearing Examiner did not order the County to take over this ground water facility (CP 719-28); in fact, the Examiner required the Developer to record a Drainage Disclosure (CP 727), which is contrary to an intent to require the County to take over this facility. Furthermore, the county codes at the time did not require the County to take over this facility; in fact, as the City pointed out in its briefing below, certain special requirements that would had to have been completed to transfer this type of facility to the County were indisputably not met. *See City’s Briefing to Div. I, supra*, pp. 7-8 hereof. Additionally, the trial court improperly relied on hearsay testimony in reaching its decision, even over the City’s clear written objections and motions to strike. CP 305-313; 195-207; 208; 214-228; 83-96. The trial court did not appear to give due - consideration to the City’s objections, first noting that the Plaintiffs’ witnesses *impermissibly* offered up hearsay testimony with regard to the County’s alleged intentions and that *this would be disregarded* by the court (CP 170-71; 83-96), but then the trial judge ignored his own words, and recited – and relied upon – the exact impermissible statements from Plaintiffs’ witnesses (the developer’s

engineers) that he said he would not rely upon; *i.e.*, speculation about what *they thought the County intended* to do in general (not even on this case, as they never testified as to what the County intended to do on this case, but only what they thought the County would do in general). (CP 175) Then, perhaps most curious of all, in reaching a factual conclusion as to the County's supposed intent back in 1987, the trial judge noted that he would rely on Plaintiffs' witnesses' speculation about what the County supposedly did on *other* cases (not this case) as evidence of what it probably did on this case, because no one from the County testified to the contrary. (*Id.*)

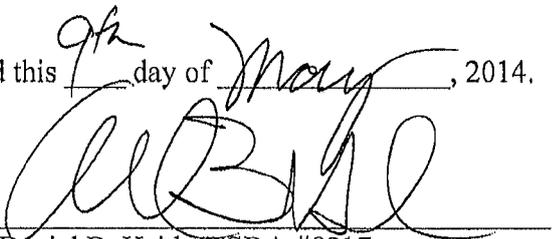
Amicus notes the obvious: it may very well be that no one from the County is employed or available to speak to a plat that is almost 30 years old. In this regard, amicus can understand the frustration of the City of Bothell that the absence of someone from the County to refute impermissible evidence of County intent is the basis for a summary judgment against the City, especially where the court is required to consider all facts, and the reasonable inferences therefrom, in the light most favorable to the nonmoving party. Furthermore, amicus has reviewed the testimony of Plaintiffs' engineers carefully. They do not once come out and say that they know, for a fact, that Snohomish County intended to take over the interceptor pipe at Crystal Ridge. They dance around this

question. The most they say is that *they (the Developer)* intended to dedicate it to the County (CP 292), but we know this never came to fruition, because the County would not accept it. The Hearing Examiner did not order the County to assume ownership and maintenance of the interceptor pipe in his Decision/Conditions of Approval (CP 719-28); plus, the Examiner ordered the Developer to file the Drainage Disclosure (CP 727). What the Developer might have “intended” when he was designing and building the plat is irrelevant. But all of that sidesteps the fact that plat did not expressly dedicate the ground water facility to the County. Evidence that it was dedicated to the County or ever accepted by the County does not exist, notwithstanding what Plaintiffs’ witness speculated would have been what anyone might have “intended.”

#### IV. CONCLUSION

For all of these reasons, and those identified by Bothell, WSAMA respectfully requests that this Court reversed the lower court and rule in support of the City of Bothell.

Respectfully submitted this 9<sup>th</sup> day of May, 2014.

  
Daniel B. Heid, WSBA #8217  
Auburn City Attorney  
Attorney for Amicus, Washington State  
Association of Municipal Attorneys

# APPENDIX 1

802  
DTRMEDC14705

TRIMEN DEVELOPMENT CO.

(206) 484-1700  
(206) 484-1920

DRAINAGE Disclosure

1725A W. CO. ST. TRIMEN  
WASH. STATE 98102

I/We, the owner(s) of that certain property, situated in unincorporated Snohomish County, Washington, being legally described as attached: See Schedule "A".

and bearing Assessor's Tax Account No (s): 414-00-010-010 and 4146-000-010-0104 have applied for and been granted PLAT APPROVAL for the Plat of CRYSTAL RIDGE Division 2 by Snohomish County Hearing Examiner pursuant to Chapter 19.40 Snohomish County Code. The official case record has been assigned county file number ZAB405140 and may be viewed in the office of the Department of Community Affairs, 4th floor, County Administration Building, Everett, WA during normal business hours.

The filing of the document:

1) Constitutes the current acknowledgment of the conditions and terms of Plat Approval for the Plat of Crystal Ridge pursuant to the Hearing Examiners decision dated Oct. 11, 1984, to wit:

That this document has been recorded with the County Auditor disclosing to all the following:

Substantial surface and subsurface drainage controls have been necessary in the development of the subject property, and that special and/or extraordinary drainage controls may be necessary on individual lots.

2) Constitutes the current owners acknowledgment of the current terms and conditions under which Approval was granted.

3) Serves as notice to any heir, successor, assign or prospective purchaser the disclosures and terms and conditions runs with the land pursuant to Section 19.40 SCC and the compliance and/or knowledge are the obligation of any owner of the subject property.

This condition has been issued without expiration date.

Dated this 29 day of OCTOBER, 19 87.

TRIMEN DEVELOPMENT COMPANY

PER KEW Wolebski  
(Owner - TYPE IN NAME)

[Signature] 11/4/87  
(Owner - Signature)

8711090861

APP. 1

HYTRMEDC14768

TRIMEN DEVELOPMENT CO.

(206) 486-1700  
(206) 486-1920

1531 WOODMERE ROAD  
WOODBRIDGE WA 98072

State of Washington)  
,  
County of Snohomish)

On this 9 day of November, 1987, before me, the undersigned a Notary Public in and for the State of Washington, duly commissioned and sworn, personally appeared Renneth Atanasi, President and WDA Woodbridge, Secretary to me known to be the President and Secretary, respectively, of TRIMEN DEVELOPMENT CO. the corporation that executed the foregoing instrument, and acknowledged the said instrument to be the free and voluntary act and deed of said corporation, for the uses and purposes therein mentioned, and on oath stated THAT HE WAS authorized to execute the said instrument and that the seal affixed to the corporate seal of said corporation. Witness my hand and official seal hereto affixed the day and year first above written.

Cheryl A. Wood - Notary  
Notary Public in and for the State of Washington, residing at Monroe  
Com Exp 5/1/89



27 NOV -9 PM 3:46  
OSCAR A. NOTARIS, PHOTODUPLICATIONS & REPRODUCTION  
Cheryl A. Wood

RECORDED

8711090881

APP. 7

The land referred to in this certificate is situated in the county of Snohomish, state of Washington, and described as follows:

A portion of Tracts 10, 11, 12 and 13, Plat of Crystal Springs Interurban Tracts, according to the plat thereof recorded in Volume 8 of Plats, page 36, in Snohomish County, Washington, also a portion of vacated 5th Avenue Southeast and 7th Avenue Southeast, all described as follows:

Beginning at the southwest corner of Tract 26, Plat of Clifford's Bothell Farms, according to the plat thereof recorded in Volume 11 of Plats, page 12, in Snohomish County, Washington;  
thence north  $0^{\circ}08'21''$  west, along the west line of said Plat of Clifford's Bothell Farms begin the east line of said vacated 7th Avenue Southeast, for 942.31 feet to the southeast corner of the Plat of Brentwood, according to the plat thereof recorded in Volume 37 of Plats, pages 197 and 198, in Snohomish County, Washington;  
thence south  $89^{\circ}30'15''$  west, along the south line of said Plat of Brentwood being also the north line of Tract 13, said Plat of Crystal Springs Interurban, for 529.05 feet to the northwest corner of said Tract 13;  
thence south  $0^{\circ}06'30''$  east, along the west line of said Plat of Crystal Springs Interurban tracts, being the centerline of 5th Avenue Southeast, vacated, for 1389.50 feet to a point 350.0 feet north of the southwest corner of said Tract 10;  
thence north  $89^{\circ}37'00''$  east, along a line 350.0 feet north of the south line of said Tract 10, for 135.0 feet;  
thence south  $0^{\circ}07'11''$  east, along a line 135.0 feet east as measured at right angles to the west line of said Tract 10, for 350.0 feet to the south line of said Tract 10;  
thence north  $89^{\circ}37'00''$  east, along the south line thereof to the southeast corner of the corrected Plat of Crystal Ridge, according to the plat thereof recorded in Volume 47 of Plats, pages 233 through 235, inclusive, in Snohomish County, Washington;  
thence north  $0^{\circ}07'11''$  west, along the west line of Tract "B" of said corrected Plat of Crystal Ridge, for 388.65 feet;  
thence continue along boundary of Tract "B" for 496.76 feet;  
thence north  $89^{\circ}33'52''$  east, along the north line of said Tract "B" for 15.0 feet to the true point of beginning.

87110903 67

APP. I



Snohomish County, Inc.

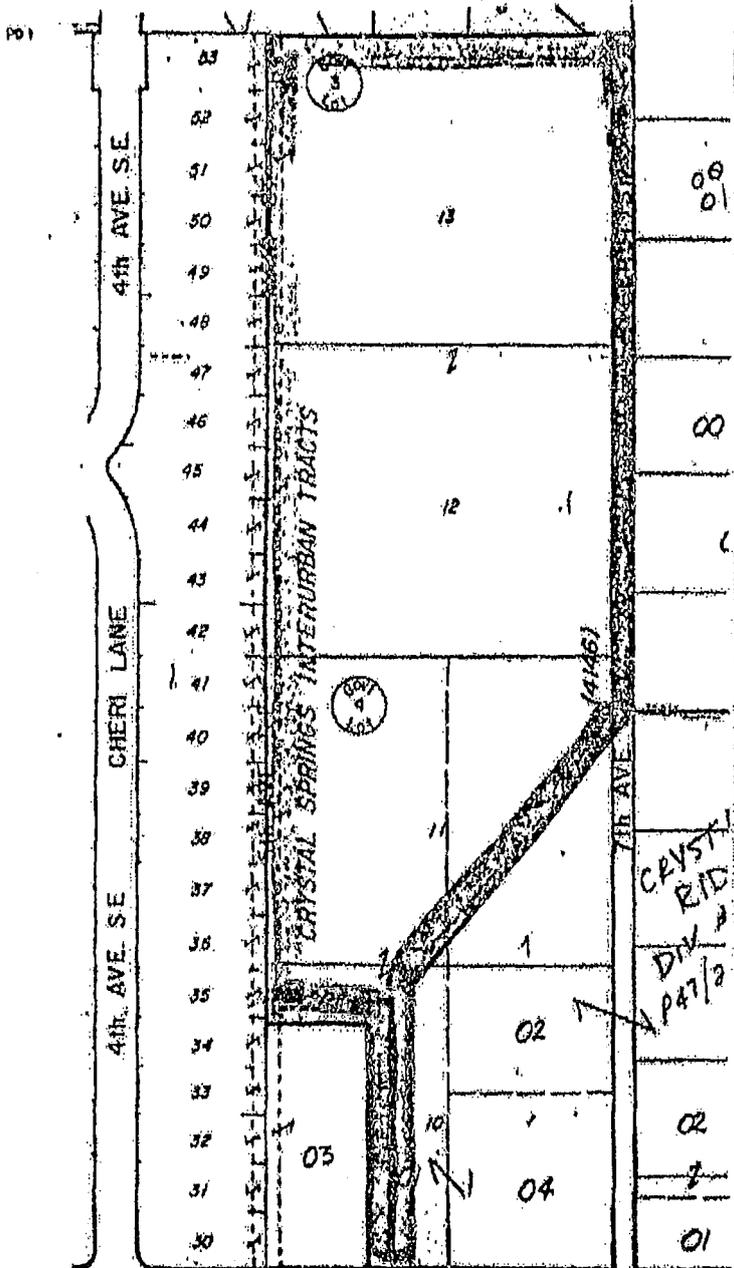
SCHEDULE "A"

PAGE 2

ORDER NO.

6739

IMPORTANT: This is not a Plat of Survey. It is furnished as a convenience to locate the land indicated hereon with reference to streets and other land. No liability is assumed by reason of reliance hereon.



8711090861

APP. 1

## OFFICE RECEPTIONIST, CLERK

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**From:** OFFICE RECEPTIONIST, CLERK  
**Sent:** Monday, May 12, 2014 8:00 AM  
**To:** 'Dan Heid'  
**Cc:** 'kwillie@tmdwlaw.com'; 'mdaudt@tmdwlaw.com'; 'bneunzig@tmdwlaw.com'; 'SCroll@kbmlawyers.com'; 'Joe.Beck@ci.bothell.wa.us'  
**Subject:** RE: WSAMA Amicus request - Motion and Brief - Crystal Ridge v Bothell - - No. 89533-3

Rec'd 5-12-14

Please note that any pleading filed as an attachment to e-mail will be treated as the original. Therefore, if a filing is by e-mail attachment, it is not necessary to mail to the court the original of the document.

**From:** Dan Heid [mailto:dheid@auburnwa.gov]  
**Sent:** Friday, May 09, 2014 5:40 PM  
**To:** Dan Heid; OFFICE RECEPTIONIST, CLERK  
**Cc:** 'kwillie@tmdwlaw.com'; 'mdaudt@tmdwlaw.com'; 'bneunzig@tmdwlaw.com'; 'SCroll@kbmlawyers.com'; 'Joe.Beck@ci.bothell.wa.us'  
**Subject:** WSAMA Amicus request - Motion and Brief - Crystal Ridge v Bothell - - No. 89533-3

Dear Mr. Carpenter:

Attached hereto please find an electronic copy of the Motion for Leave to file Brief of Amicus Curiae and Brief of the Washington State Association of Municipal Attorneys (WSAMA) in support of the City of Bothell in its case in chief in the above-referenced matter. WSAMA previously submitted a Brief in Support of Review, but feels that because of the importance of the issues involved, it needs to seek leave to submit a Brief in connection with the issues ultimately to be decided by the Court.

While I realize that the Brief would be due Monday, I have been watching the pleadings and correspondence going back and forth between counsel for the parties and I, at least, wanted to get this to the parties sooner rather than later. With that, in addition to mailing my pleadings to counsel of record, per the certificate of mailing (appended to the Motion), for their convenience, I am also cc'ing them with this e-mail, and I am also including an electronic copy of my cover letter.

Please let me know if you have any questions. Thank you.

Dan Heid

Daniel B. Heid  
Auburn City Attorney  
(253) 931-3030  
[dheid@auburnwa.gov](mailto:dheid@auburnwa.gov)

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