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SUPREME COURT NO. 91775-2 _____ RECEIVED BY E-MAIL
COURT OF APPEALS CASE NO. 45832-2-ii

IN THE SUPREME COURT OF
THE STATE OF WASHINGTON

N.L.,

Respondent,

v.

BETHEL SCHOOL DISTRICT,

Petitioner.

N.L.'S ANSWER TO BRIEF OF AMICUS CURIAE WASHINGTON
STATE ASSOCIATION FOR JUSTICE FOUNDATION

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 ORIGINAL

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I. IDENTITY OF THE PARTY FILING ANSWER

This Answer to the Amicus brief filed by the Washington Association for Justice Foundation (WSAJF) is filed by the Respondent, N.L.

II. RELIEF REQUESTED

The arguments and authority cited by WSAJF in its Amicus brief are consistent with the arguments made by N.L. to this Court and the Court of Appeals. N.L. asks this Court to affirm the Court of Appeals' decision in *N.L.*¹

III. STATEMENT OF THE CASE

N.L. incorporates by reference her statement of the case set forth in her Answer to the Petition for Review.

IV. ARGUMENT

A. WSAJF's argument and authority are consistent with N.L.'s argument to this Court.

"Brevity is the soul of wit."² WSAJF has written an extensive and well reasoned brief that supports N.L.'s arguments before this Court. WSAJF adeptly argues that N.L.'s claim is sounded generally in the Restatement of Torts and this Court's precedent, and provides compelling

¹ *N.L. v. Bethel School District*, 348 P.3d 1237 (2015).

² *Hamlet*, by William Shakespeare.

authority as to why this Court should affirm the Court of Appeals' decision. N.L. concurs.

V. **CONCLUSION**

WSAJF's Amicus Brief provides compelling legal authority for this Court to consider and is consistent with N.L.'s arguments to this Court. The Court should affirm the Court of Appeals' decision and give N.L. her day in court.

DATED this 14th of January, 2016.

CONNELLY LAW OFFICES, PLLC

By: s/ Julie Kays
Julie A. Kays, WSBA No. 30385
Attorney for N.L.

CERTIFICATE OF SERVICE

I, Marla H. Folsom, hereby certify that I filed the foregoing with the Supreme Court of Washington, and served same upon the following counsel of record via email:

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DATED this 14th day of January, 2016.

s/Marla H. Folsom

Marla H. Folsom, Paralegal to Julie A. Kays

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Good afternoon,

Attached for filing is Respondent N.L.'s Answer to Brief of Amicus Curiae Washington State Association for Justice Foundation.

A copy of the same is being served simultaneously on all parties.

Thank you.

Respectfully submitted,

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