65931-6 IN THE COURT OF APPEALS OF 65931-6
STATE OF WASHINGTON

DIVISION I
NO. [redacted]

10 APR 15 AM 8:08
BY RONALD R. CARPENTER
CLERK

LAURA L WILLIAMS
PLAINTIFF AN APPELLANT

v

THE City of SEATTLE AN Municipality
DEFENDANT AN Respondent

BRIEF OF APPELLANT

ON THE APPEAL FROM KING County
Superior Court. THE Honorable

Michael Tricky Judge

ORAL ARGUMENT REQUESTED

APPEARANCES

City Hall 600 Fourth Avenue 4 Floor PO BOX 94769 SEATTLE WASHINGTON 98124-4769	GEORGE F HAIDMAN, ATTORNEY FOR Respondent
6900 S 123rd St #H-199 SEATTLE WASHINGTON 98178 206-772-1706	LAURA WILLIAMS APPELLANT PRO SE.

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1. POTH V DEXTER HORTON Estate, 248 P. 374. 140 WASH 272.

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2. Schaeffer v wood Head, 63 WASH App. 627. 821 P. 2d 75 RestATEMENT (Second) of TORT + 343. 343A.

OTHER AUTHORITIES

3. Iwai v STATE, 915 P 2d 1089 129 WASH 2d 84.

4. RCW + TITLE 4th CHAPTER 4.96 + SECTION 4.96.010 496 020 (TORTIOUS)

1 Wilson. 98 WN 2d at 437, + 4 + Notice of Defect, Utility Cover in Sidewalk Also Called A (GRATE).

Rule + Regulations

27 WASH P 2d - 261 WASH, 1926

OTHER JURISDICTION

17.3 Nibarger v City of SEATTLE, 53 WN 2d 228, 229, 332, P 2d 463 (1958)

17.4 WASHINGTON Constitution ARTICLE 11, SECTION 11, (GRANT of police powers to Cities) RCW 35.22.010 .280 (7) (8) And (30) Defining First Class Cities and granting powers to First Class Cities to Construct And Regulate public Right of way INCluding Side WALKS.

FOURTH PAGE

OTHER AUTHORITIES Cont.

Injury's on premises.

Determination of the plaintiffs status, whether a person is classified as an invitee, licensee, or trespasser is a question of law for the court, unless their is some factural dispute over the circumstances. Surrounding the injured. Arthur W. Verharen. J No. 90-2-11648-8. P.C. WA January 10. 1992 -- 575.

INTRODUCTION

YOU MAY CONSIDER

1. WAS DEFENDANT BEING NEGLECTFUL OF His obligations of ensuring Safety on His public property ?

2. DID DEFENDANT CREAT dangerous Condition. (PAGE-8)

3. DID DEFENDANT All Ready know About the EXISTENCE of Such Condition But Failed to IMPLEMENT IMMEdiate Action (PAGE-28)

4. HAS the DANGERous Condition BEEN present For Considerable period, the DEFENDANT, He should HAVE DISCOVERED About it And took MEASURES to CORRECT it. (PAGE-5-A

I.

INTRODUCTION CONT.

5. DID PLAINTIFF DO ANY acts THAT MAY add to THE EFFECTS OF THE ACCIDENT? PAGE - 21

6. WAS THERE ANY WARNING SIGNS SITUATED AT THE AREA WHERE THE ACCIDENT ACCURRED (PAGE - 29)

ASSIGNMENT OF ERROR

1. A. SUPERIOR COURT ERRED IN, HAS THE DANGEROUS CONDITION BEEN PRESENT FOR CONSIDERABLE PERIOD THAT HE SHOULD HAVE DECOVERED IT?

B. SUPERIOR COURT ERRED IN ENTERING THE ORDER ON JULY 24, 2009. DISSMISSING, TRAIL DATE ON APRIL 09. 2010. AS A MATTER OF LAW. DEFENDANT NOT KNOWING ABOUT WATER LEAK ON 5231 39 AVE SO. FOR OVER 2 YEAR'S BEFORE PLAINTIFFS INJURY. NOVEMBER 28, 2005. RCW - TITLE - 4 CHAPTER 4.56 > SECTION 456. 120 (3) (8) RULES OF THE COURT OF C.R 41 (A) (B).

ASSIGNMENT OF ERROR CONT.

1. C SUPERIOR COURT ERRED IN Knowing Cities professional, Roy ELLIOT PLANNEI TO CHANGE Second DECLARATION with OUT Notifing THE COURT. Legal DUCUMENTS. ER 803. CR 44 (A) (1). RCW TITIE 4 CHAPTER 408. 120-140.

2 A SUPERIOR Court ERRED IN ENTERING Summary Judge MENT ON July 24. 2009. with-out PLAINTIFF Knowing THE CORRECT proceedings DATE. AND →

→ B MEDICAL RECORDS. And Hospital Bills. AND →

→ C DISCOVERY OF THE BLACK ICE. AND

ASSIGNMENT OF ERROR CONT.

→ 2. D DEFENDANT - NEGILECT HIS DUTY, WITH HOLDING INFORMATION.

SENATE COMMITTEE

SENATE BILL REPORTS SB 5422.

PERSON TESTIFYING (PRO:) THOMAS O'KEEFE, AMERICAN WHITE WATER: CAROL WARDELL, MICHELLE SMITH, CHELAN PUD.

CON: JOHN BUDLONG, WASHLINGTON ASSOCIATION FOR JUSTICE: THE CITY'S DUTY TO INSPECT THE PREMISES AND DISCOVER DANGEROUS CONDITION UPON COMMUNICATING WITH PROPERTY OWNERS AND SECRETARIES. PROPERTY DUMSTERS.

ISSUES PERTAINING TO ASSIGNMENT OF ERROR

1 A. DEFENDANT KNEW 24HR PRIOR, ABOUT THIS CONDITION: REASON BEING: I HAVE WORK ORDERS FOR JANUARY 3, 2002 CALLER SAYS THEIRS A LEAK IN FRONT OF HIS HOUSE. SEPTEMBER 07, 2004 BETWEEN METER AND MAIN. NO NEED TO MOVE PLANTS, AUGUST 04 2003 3.27 PM LEAK PARKING STRIP CALLER SAID WATER BUBBLING UP OVER. WANTS TO BE NOTIFIED, BEFORE CREW DIGS. SO THE OWNER CAN MOVE HIS PLANTS, (LANDSCAPING) GIVEN TO 333 ROBERT CLARKE. (OWENSD 07/29/03 10:05 AM - HOLD - REASON - DELAYED BY OTHER WORK.)

ISSUES PERTAINING TO ASSIGNMENT OF ERROR CONT.

1 A STATEMENT ON WORK ORDER.
DEFENDANT ALSO REMOVED THE
EXCESS DIRT FROM THE BOX TO READ
THE METER. JOB COMPLETE KA: TOR
7/29/03 ALSO MR Boyd would only
talk to proffessionals. (Judge.)
WOULD LIKE TO BE SUPENA.
CALLER SAY'S HER METER BOX
HAS BEEN FLOODING FOR APX 1 wk
GIVING to High Power 317. SIMMONDS
09/29/2004 830 PM REMOVED JUMPER
PER INSPECTOR AND RAISED DANGEROUS
BOX IMS # 432578 LANTS MIW P
GIVEN TO 315 FOR Replacement.
DUPLICATE W.O. FOR RENEWAL GRAY

ISSUES PERTAINING TO ASSIGNMENT OF ERROR CONT.

C 09.14.04 03:48 pM RENEWED 3/4 IN PL. SERVICE to COPPER. BACKFILLED to GRADE WATER ON. (JOB COMPLETE). TURNED IN locate Slip. SARGENT: August 8 9:40 PM -- A to South leak.

WHERE Professional City EMPLOYEE Roy ELLIOT STATED MARCH 26 2009 IN His Second DECLARATION. photographic EVIDENCE IN the Case DEMONSTRATES THAT 39th AVENUE South Consists of A PAVED Roadway Aprons To provide access to Adjoining Driveways planting strips of GRASS

A Rock wall, Street, TREES,
Utility Poles, AND A Side WALK
FOR Pedestrians use. The City
of SEATTLE CHANGED THIS Natural
DRAINWAY By applying PAVEMENT AND
Concrete over it Surface. Ray Elliott
Reported. THE WATER IN the Exspansion
Joints [IN THE SIDEWALK] is Underpresure
Due to the Capping EFFECT of THE
Concrete. THE presure is Released
At THE Joints (GROUND WATER) THE
Slope Draning to THE NORTH EAST is
Blocked Much like A DAM, By THE
Concrete Retaining WALLS, AND
REDIRECTED to THE EAST toward

THE SIDEWALK. SIGNIFICANTLY.
DEFENDANT ADMITS THAT IT CREATED
A DAM.? (CAPPING EFFECT) TO
REDIRECT NATURAL SPRING TOWARD
THE SIDEWALK. THE CITY CANNOT
BUILD ROAD PUBLIC USE, SYSTEM
TO CHANGE THE NATURAL WATER
DRAIN E AND THEN, CLAIM THAT
THE FIRST EXCEPTION DOES NOT APPLY
ALSO DEFENDANT STATED THESE
CALLERS COMPLAINT OF LEAKS ON
39ST SO COMPLAINTED IN 2009
WITHHOLDING INFORMATION. 2002-
THROUGH 2008 NEVER ADDRESSED
SAFETY SIGNS, FOR PUBLIC, PEDESTRIANS

Love ones, School kids passing over this detterrating, Pot Hole's Separating Side walks 24 Hours A Day wasted City waters For So many years 2002 — 2009 Defendant SAID: They Cant Controll Surface water Even After my Claim April May 2006 which I Started. Defendant Still Fail to put Safty Signs and Correct the Condition. Fix, Controll, Surface water, 24 Hours A Day wasted city water, Running Down the Street. until Now July 2009. It's Controlled NEW Exibits LAST PAGE OF Brief. Utility

COVER IN SIDEWALK. THERE IS HOWEVER A limit to A City liability FOR HAZARDOUS Sidewalk A FIRST CLASS CITY MUST HAVE A NOTICE of DANGEROUS Condition, WHICH it DIDNOT CREATE Until July 2009 7year's LATER, A Reasonable OPPORTUNITY to CORRECT it BEFORE liability ARISES for Negligence. From Neglect of Duty, to KEEP the public WALK WAYS (SIDEWALKS) SAFE. (NIBARGER v City of SEATTLE 53 WN 2d 228, 229, 332, P 2d 463 (1958). only Ruins when it Rains as of July 2009.

11.

My I Please Ask the Courts if I May Retriere My CD And MAP From the Rejection Files Here At the Supreme Court. very ValuBale Information factual Exzibits. Exzibits From 2005-2008. MAP - Most Callers And Dates Defendant Said No Complaints Until 2008 MAP Shows Starting 2002. (85.05. 070 (1)(3) 85.05. 072 Hearing Pertaining Assignment of Error 1.(A)-(B) PAGE 1

ISSUES PERTAINING TO ASSIGNMENT OF ERROR CONT.

2 A THE OWNER IN the Big House NEXT TO MR Boyd Property Owner 39 st So. Called Complaint About leak in Front of His House Before 2005 → IN THE DIRT. MR Boyd and Secretaries would ONLY TALK TO professionals (JUDGE) About the defendants And them Comunications And Diggings. my Council tode me July 29 was the Date of Summary Judgement My ABulance Report, Medical Records pain & Suffering, My presents, original CD present. Attorney said did Not

NEED ANY OF THAT AT THIS HEARING. AND SLIP AND FALL CASES ARE HARD TO BEAT BEFORE THE COURT PROCEEDING. DID NOT WAN TELL ME THE Judges NAME AFTER Proceeding SAID SHE didNot know it. ONLY MIKE. NOW WONT EVEN TALK TO ME AND HAVEN'T. At All. JUST SEND ME $800 Bills NOW.

ISSUES PERTAINING TO ASSIGNMENT OF ERROR PAGE-2 (A)

ISSUES PERTAINING TO ASSIGNMENT OF ERROR

3A. I HAVE AMBULANCE Report From Fire DEPTMENT, wito pick me up From My Slip And Fall. BLACK Ice public property And Hospital Bill over 2800 Not Including therapy, Doctor ask if I H ARED A Snap ON Report Scar ON my Top Foot (Smooth) foot twisted around My Hole Body. HARDWARE 1 Metal plate 7 Scre s 1 wk in Hospital Nov 28 2005 Till Dec 1, 2005. Discovery OF BLACK ICE I SAT iN it Very

cold shinny on top Black on the Bottom. I NEVER Heard off Black I in my life. Moved to SEATTLE Just Two MONTH Be for My Injury. DEFENDANT Neglect His Duty Low class Complex (CRACK SMOKERS) STATED By Employee Richard GARNER Managers Boy At the time. Cause of area. NEVER seen water Run like that Never Even ANY where in SEATTLE. ONLY IN Front of this APARTMENT THE AFRICAN AMERICAN OWNS MR Boyd. STARTS IN HALF of the Block of the Big House NEXT DOOR. PAGE -2 (B)(C)

ISSUES PERTAINTING TO ASSIGNMENT OF ERROR

3 A MY ATTORNEY SAID I WROTE TO MUCH. SO SHE AFTER I SIGNED THE DECLARATION. SHE REWORDED it. I DID NOT KNOW TILL AFTER THE FACT SHE CHANGED it Completly. I Thought the Client Does what EVER the attorney Says. Cause SHE Knows BETTER then Any one. Just Follow, SHE'S INCHARGE.

PERTAINING TO ASSIGNMENT OF ERROR

PAGE 2 2-(A)(B)(C)

STATEMENT OF THE CASE

ON NOVEMBER 28, 2005 PLAINTIFF AROSE ABOUT 4:30AM TO GO TO HER NEW JOB AT PIONEER DISTRUBUSIOR CENTER. (HAVE CHECK STUB).

PLAINTIFF LEFT HER APARTMENT AT 5:30AM TO CATCH THE BUS, ON RAINIER AVE. AS PLAINTIFF STEP ON TO PUBLIC SIDEWALK DANGEROUSLY AND SUDDENLY FELL TO THE GROUND DIDN'T KNOW WHAT HAPPEN SO FAST. PLAINTIFF, HER FOOT (RIGHT) WAS TURNED ALL THE WAY GROUND, HER BODY, A STRANGE MAN WALK UP TO HER AND ASK ARE YOU - OK

STATEMENT OF THE CASE. CONT.

you Slip in this BLACK ICE Right HERE, I NEVER HEARD OF BLACK ICE IN MY WHOLE LIFE, JUST MOVED HERE from SAN Diego. THE End of August 2005, From SAN Diego Calif, 3 month before plaintiff. Injury. But the Ground was Very Cold. Shinny ICE on top And the Bottom was BLACK. the MAN call ambulance 911 on My Cell phone. I To the MAN To Go to my Apt. And get My Son, He was 10 At the TIME. I WANTED TO TELL My Son To Be CAREFULL. When He

CROSSES OVER THIS SIDE WALK TO CATCH THE BUS TO SCHOOL. I NEVER HEARD OF BLACK ICE SO I ASSUME HE HAD NOT ALSO. (SON STATE) MOM YOU JUST FEEL CAUSE YOUR FAT. (SON STATED) DON'T WORRY MOM I WON'T FALL. AMBULANCE CAME RIGHT AWAY TOOK ME TO HARBOR VIEW GAVE MEDICATION RIGHT AWAY. I WAS IN A LOT OF PAIN, I DONT CLEARLY BUT I BELIEVE, SURGERY THE NEXT DAY. AND THE SAME I CAME TO THE HOSPITAL ABOUT 6:00 AM NOVEMBER 28, 2005

HARBOR VIEW TOOK Blood WORK 1:00pm NOVEMBER 28, 2005. This is what MEDICAL RECORDS, (STATED) [THERE WAS A STATEMENT From My Attorney THEIR WAS Cocaine, Meth, or other Drugs IN My . MEDICAL RECORDS STATED - (

THIS WAS A STATEMENT From Richard GARDNER APARTMENT Managers Boyfriend City EMPLOYEE. THATS why City FAILED to Fix THE stream of water IN FRONT OF 5231 39th Street South Drug area. Lower CLASS.

UPON Surgery at HARBOR VIEW,
1 MEDAL BAR, 7 SCREWS,
INSTALLED IN MY Right ANKLE.
Lots of Steches. Ogly SCAR ON
TOP OF MY Foot. SCARing steches
12 inches long ON Right Side of
ANKLE, STAYED IN Hospital FOR
1 WK. CAST ON ANKLE with
CRUCHES. Knee down to Foot
Lots OF PAIN. MEDICATION (Strong)
with Refills. 6 MONTHS TO A
YEAR to Recover with psyical
therapy, MY SON TOOK CARE
OF ME. I KNEW NO ONE Hear
IN SEATTLE. Lost MY 2 Jobs.

plaintiff now has fobia to Rain and Snow hear in Seattle. when it Snows, I all way have whom ever I go out side with half to hold my arm even today, scarred it my happen again being it happen so fast. So suddenly, unexpectly. did not know something like this could happen to any one, like this. Ive never been in any tramatic/accident/emergency situtation like this ever in my whole life. got evicted april 2006 from 5231 39TH Street.

ME AND My Son. Became Home less
My Son And I For 1 YEAR. WE
HAd to MOVED BACK to SAN Diego
lived it A Garage. And a Crack
House (Controlled Substance) —
with the law Enforce Coming in
the Home. checking for warrents
Every Montth. 2006-2007. Swelling
in ANKLE Every day. WASN't Eat good
Foods ~~At~~ All Hungrey a lot. Me And
My Son. Strugled. Need to go
Back to School for New Career
Right ANKLE SHOES NEEds to Be
A Size 1½ LARGER. NOW I HAve
Restless Feet. DOCTOR SAid I AM.

I AM SUBJECT to ORTHERIDIST,
I AM AT THE BEGIN STAGE. THIS
WAS TODE TO ME EMERGENCY ROOM
2009, AND THE METAL BAR
will NEED TO BE TAKEN OUT
Evenally. with in A year OR
IATER. (NEAR FUTURE) in THE
Cold PAIN will get REAL BAd.
MY DOCTOR Bills ARE OVER
$28000 NOT INCLUDING PSYICAL
Therapy. DSHS PAID FOR
INPATIENTS SERVICE But Need
To BE PAID BACK.

ARGUMENT

MY ARGUMENT IS, BEING THE DEFENDANT KNEW ABOUT THIS DEFECTED AREA YEARS BEFORE PLAINTIFF INJURY. ON THE FACT THAT MR Boyd PROPERTY OWNER OF 5231 39st So SEATTLE WASHINGTON, 98118. FOR ONE MR Boyd STAYED IN CONTACT TWICE A MONTH FOR PAYMENT OF His DUMSTERS. (SENSE 2002) ON CONTRACK. [WORKORDERS]. ALSO - EXPLAINED,

2

(PAGE 5 NO. 1)

DEFENDANT ALSO STATED
NO WAY THEY CAN CONTROLL
SURFACE WATER its Control.
NOW AS of July 2009.
My Knowledge, with SAFTEY
SIGNS. ON THE HILL ON
8231 39th AVE SO. EXZIBITS
PAGE. END OF BRIEF.
ALSO MY ARGUMEAST IS
April 2006, I put IN My
LAW SUIT. to the DEFENDANT

29

2006, 2007, 2008, DEFENTANT
Failed to Fix. put SAFTEY
Sign Until 2009 of July.
again. I HAVE A MAP OF
All Complaining Residents
over 15. with WORK ORDERS
PAGE. (REJECTION FILE)
ALSO ACROSS THE STREET
DEFENDANT FIX. LEAK
WORK ORDER 200
ALSO Ray Elliot STATED
IN His 2 DECLARATION

REDIRECTED WATERS OVER THE
SIDE WALK. IN FRONT of MR Boyds,
property. Roy Elliott TOOK it
APOND His SELF ON THE Computer
CHANged His SECOND DeclARATION,
Completly Different statement
without NOTICE to the Court.
that He meant Some thing Else.
LAST 3 pages of Brief. Also
BlACK Ice I DiD Slip iN. MEDICAl
Record, psyicall therapy Report.
SCAR on top of my foot. AMBulANCE
Report. public SideWALK. I SAT in
it. why WAS this area ECNORED
FOR So long WASted City WATERS

ARGUMENT CONT.

THE DATE OF THE INJURY WAS NOVEMBER 28 2005 NOT NOVEMBER 22 2005. AMBULANCE REPORT DATED. DID THE Superior Court ERR in Knowing the DEFendant was witH Holding Life And threating public, State, Information. RCW > TITIE 90 > CHAPTER 90.03 > SECTION 90.03. 600 591 605) (2003 1st Sp.s c 15 § 3; 1995 § 635. 1987 c 109 § 157; 1977 ex.s c 1 § 8 FORMERly RCW 43. 83 B. 335. DID THE Superior Court ERR in Knowing if THERE is A UTility

Cover on the public sidewalk (Grate) there is how ever a limit to city liability for hazardous sidewalks. A city must have notice of dangerous condition which the city did not post until July 2009 7 years and 3 years later. property owner Mr Boyd and the owner of the Big House complaint - 2003, 2004,. plaintiff law suit. 2006. map of the residenial area of 39th st so complaints over 5 thousand gallons a day over 5-7 years 24 hours a day non stop.

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WASTED CITY WATERS. FOR Negilect of Duty. KEEP City public property SAFE. Public PEDESTRian USE.

(Nibarger v city of SEATTLE. 53 WN 2d 228, 229, 332. P 2d 436 (1958. (Superior Court FOR pierce County No 90-2-11648-0 ARTHUR W. Verharen J. (Supreme Court affirm the Judgement Against THE City, Williams J. Whitman County Title > 907 CHAPTER 90 Section 90.44.052 [1945 c 263 4; 1945 § 7400-4) Does this 98 Court Cases @www.Courts.WA.Gov

UNDER LAURA LEAH Williams SENCE 1990 IN WASHINGTON Including My pending Courts CASE. HAVE Anything to Do with the Defendant, to CREDIT THE plaintiff (Defamation) Does the Defendant HAVE any thing to Do with 3 different Computers in A 1 month period ON MY Home Computer HAVE Any thing to Do with. Viruses. ON MY Home Computer. FROM JANUARY 9. 2000 - Feb. 2010.

Conclusion

THE PLAINTIFF IS ENTITLED TO CLAIM ALL DAMAGES. SENATE BILL REPORTS SB 5422. (CONTRACT AND TORT LIABILITY. RCW 11.98 110 (1) AN AWARD SPECIAL COMPENSATORY DAMAGES TO COMPENSATE PLAINTIFF FOR PAST AND FUTURE EXPENSES. DIRECTING DEFENDANT TO PLACE PLAINTIFF IN A POSITION SH/E WOULD HAVE HEILD, BUT FOR DEFENDANTS NEGLIGENCE AND TO MAKE PLAINTIFF WHOLE FOR ALL EARINGS AND BENEFITS.

SHE WOULD HAVE RECEIVED, but FOR HER INJURYS Including But NOT limited to wage Ben-efits. AND Interest ALSO AWARD General DAMAGES. TO Compensate PLAINTIFF FOR INTER ALIA Emotional Distress, Humiliation AND anxiety IN THE full Amount, FOR THE FOR going Reason, THE DECISION of THE Supreme Court should Be Reversed. MAR. 1994 STATE v NALLIE 123 Wn. 2nd 585, 870 P 2d 295 (585) THE TACOMA ordinance TMC 9.17.010. 020 Constitutes AND DECLARING

Respondants Josepth Gunderman.
JR AND JANE DOE. TMC 9.17.
010 AND 020 Unconstitutional.
Anderson CJ AND UTTER
BRACHTENBACH Dolliver.
DURHAM. Guy. JOHNSON.
AND MADSEN. JJ. CONCUR.
(ESTAMADED - All Damages)
PAST AND FUTURE. ME AND MY Son
(1.600.000)
ONE Million Six Hundred thousand.

1. INABLE TO RETURN TO ANY OF THE MANY
Recreational endeavors previously
enjoyed, without Restrictions.
2. PERSONAL INJURY
3. SCARING 4. UNEVEN ANKLE

36

(5) My Injury No fault of My own
(6) Damages Incurred finacial Damages
(7) monetary NEEDS.
(8) OPEN Reduction.
(9) Internal Fixation Surgery.
(10) Medal Rod Inserted.
(11) 7 Screws Hold Bone in place
(12) Family stressed
(13) Hospital Bills Never gonna End,
5-days in Hospital November 28, 2005
- December 1, 2005
(14) Sustaining our Family daily Basic
necessities
(15) All possible Sanction.
(16) Strict liability
(17) No Medical Insurance
(18) worring Finacial position
(19) Severe Brusing
(20) Broken limb long lasting Effects
(21) Time off work
(22) Doctor ask if I Heard A Snap
Doctor wrote a Statement
(23) No Sick pay
(24) Homeless 2yr's
(25) Pain And Suffering
(26) loss Earnings
(27) Doctor Stated At Harbor View
Nov 2009 Early Stage of Arthritis
Starting

(28) Medal Rod need to Be Removed Sooner or later
(29) Additional Surgery (future)
(30) Restless foot, knee's to Bottom of foot
(31) punitive Damages
(32) Afobia- when ground is wet in Seattl
(33) Economic
(34) poyical therapy
(35) Shoe size Larger Right ankle.
(36) Cant Lay on my Right Leg thin Skin medal Bar And Screws presure, Just By touch of Any thing Against ANKLE Severe Pain
(37) lost of Enjoyment.
(38) Cant Bend, Stoop Down Any More
(39) loss of Flexable leg movement with other Relations
(40) Chronic Pain
(41) Equipment At the time
(42) Medical tranportation up to 1 year CAB (Hospital)
(43) Standing walking short term only
(44) Forever Suffering
(45) Sitting up For More then 3 Hours Swelling, Pain, Have to elavate.
(46) ligaments in the area tore So Violently it Actually Cause A Break Away.

(47) Surgery needed to stabalize the Bone (in sertion of screws + medal plate
(48) ongoing Recovery
(49) upon getting up to walk stop to MAKE SURE ANKLE in the Correct position. if not it will Hurt And won't be Able to walk. (out of place) (A pinch)
(50) Range of motion
(51) CAST, Boot - Knee Down
(53) 6 months to 1 year to Heal Correctly
(54) Evicted - April 2006. 5231 39st So
(55) High self Esteem all My life Trying Hard to fell this way Again within My self CAN't Seem to Find that beatiful feeling any More and around people.
(56) No MORE MINI SKIRTS thats All I ever wore. Embarrassed ogly ankle. why do I why am I

Having to go throw all this By my self Finacially Surfing MENTALLY, Psyically. EMOTIONALLY. THIS HAPPEN IN 2005 NOW (2010)

My Stress Condition HAS gotten worse its so HARD to Raise My Son. (Stay Focused)

TORT LAW

RCW TITIE 4 > CHAPTER 4.12 SECTION 4.12.020 (3) Company Liable. Company For Damages. 81.04.440 Violation of Duty. Should HAVE Been POSTED of what Ever Time of Redirect and there AFTER, For the Larger Flow of WASTED City WATERS.

NO

I DECLARE UNDER PENALTY OF PERJURY UNDER THE LAWS, THE STATE OF WASHINGTON THAT THE FORGOING IS TRUE AND CORRECT

DATE AT SEATTLE WASHINGTON THIS 12 DAY OF APRIL 2010

Laura L Williams

APELLANT pro SE

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APPENDIX

1 A- APPEARANCES- TITLE PAGE (FIRST PAGE)

2 - TABLE OF CONTENTS - BRIEF OUTLINE (SECOND PAGE)

3 - TABLE OF AUTHORITIES - OTHER CASES (Third PAGE)

4 OTHER AUTHORITIES - OTHER CASES Supporting CLAIM. (FOURTH PAGE)

5 OTHER AUTHORITIES - PLAINTIFF STATUS question of LAW, FOR THE COURT. (FIFTH PAGE)

6 INTRODUCTION YOU MAY CONSIDER

DEFENDANT Negilances.
SAFETY SIGNS.
Defendant Great Dangerous Condition.
Defendant know about this Condition.
Defendant Fail to fix.
Condition been present for a Considerable long time
should Defendant should HAVE Discovered About
t and took Measures to Correct it.
Did PLAINTIFF acts MAY add to THE Effect of
Accident.
were there any warning Sign At accident
where accurred. (PAGES (ROMAN) I. II)

42.

APPENDIX CONT.

7A. ASSIGNMENT OF ERR, SUPERIOR COURT ERR IN PAGE 1-2-3-4

7. B. Should THE DANGEROUS Condition, SHOULD HAVE BEEN DECOVERED.

C. DISMISSAL OF TRAIL COURT.

D. AS A MATTER OF LAW.

E. IF LEAK WAS DECOVERED before plaintiffs INJURY. (INJURY DATE)

F. RCW LAW Applies. (WA.)

PAGE - 2.

1. C. MUST NOTIFY THE Courts BEFORE CHANGING a Legal Documents OR STATEMENT's (Declaration).

RCW LAW Following To SUPPORT.

APPENDIX CONT.

PAGE-2
ASSIGNMENT OF ERR.

2 A.
SUPERIOR COURT ERR. PLAINTIFF WAS giving the wrong DATE FOR Court, by Council. NEED TO present, FACTURAL EVIDENCE. (MISREPRESENTED.)

PAGE-3
ASSIGNMENT OF ERR

2 D. Negilect OF Duty.

D. First CLASS City, it is A (Must) BE HONEST, will AFFECT THE Society.

PAGE-3 - SENATE COMMITTE.

SENATE Bill Reports

STATE MENT

APPENDIX CONT.

PAGE - 4

ISSUES PERTAINING to ASSIGNMENT of E.R.R.

1A. DEFENDANT KNEW about WASTED Running City WATERS. Coming out of EXPANSION JOINTS, UNDER Side WALK TURNED IN to Surface STREAM.

1B. LEAK IN FRONT of Big House,

1C. Phone Call to the City (DATES)

1D. leak Between And MAIN.

1E. WATERS Bubbling up. (DATES)

1F. CALLER wants to Be NOTIFED Before His Crew Digs Plants. (LANDSCAPING)

1G. CALLER TALK to City Employee, NAME DATE AND TIME of Call.

APPENDIX CONT.

1 H.
Hold - Reason - Delayed By other work

PAGE - 5
1. A. Completed the job on 5231 39th Street Removed Dirt from Box to Read Meter

1 A. Job Complete (Defendant)

1A. Apartment owner want to Be Supena.

1A (Caller) - Meter Box Has Been Flooding

1A Work orders, → Caller talk to → City Employee, Name, ID Number, Date, Time.

1A, Inspector → Explain work done.

APPENDIX CONT.

ISSUES PERTAINING TO ASSIGNMENT OF ERR

1A. TIME, DATE, EMPLOYEE NAME, JOB COMPLETE.

1A. DATE, LOCATION, ANOTHER LEAK

1A. EXPLAINS THE CITY (HOW) CHANGED THE PUBLIC'S, PEDESTRIANS, PUBLIC SIDEWALK, DRAINWAY, AND WHAT THEY APPLIED, ON TWO, AND OVER.

1A. WHAT CITY USED ON PUBLIC SIDEWALKS, AND NATURAL DRAIN WAY.

1A. DEFENDANT EXPLAINS WHAT THE

PAGE 7 APPENDIX CONT.

1A City's Public Side WALKS EXPANTION JOINT'S IN OR ON THE SIDE WALK HOW

PAGE 8

Defendant Created, CHANGED, this Condition. BEFORE PLAINTIFFS INJURY.

1A. DEFENDANT Contradicted THEMSELF

1A. CHANGED DATES OF CALLER'S

1A SAFTEY SIGNS.

PAGE 9

1A DEFENDANT CANT Control SURFACE WATER.

1A. DATES OF WATER Being INCONTROL

PAGE 10

1A Negligence FROM Neglect.

PAGE 11. ASKING THE COURT TO

APPENDIX CONT.

PAGE 11.

1A. RETRIEVE My personal INFORMATION. About MAPS + CDS

1A. RCW CODE.

ISSUES PERTAINING TO ASSIGNMENT OF ERR

PAGE-12

2. A. HOUSE OWNER, Apt OWNER Complaint About LEAK Before Injury.

2. A OWNERS WOULD like to Speak to Judge

2 A. Council GAVE PLAINTIFF wrong Court DATE

2A. Council STATED Did Not NEED To Come to Court. And NO Reports, Record, My Presents, NOT NEEDED At this Court Hearing. July 24 2009.

2 A. Slip And Fall Cases ARE hard TO Beat.

APPENDIX CONT.

PAGE - 13

2A Did Not Know Judges Name.

PAGE - 14

3A PLAINTIFF HAS All Records And Reports (MEDICAL)(Billing)

3A ANKLE Speak's For it Self (Factural)

3A dicovery of Black Ice Surgery, HARDWARE INSTAILED Hospital Bills, Hospital Stay.

3A VERBAL STATEMENT FROM MANAGER Bayfriend City Employee. WHY Defendant Haven't fixed Condition.

Dated → 2006

3A where water Begun's, 7 year

PAGE 17 → 18-19-20- APPENDIX CONT.

STATEMENT OF THE CASE

1A. How the whole Incident Accurred. what All Happened.

1A. when plaintiff moved in Apt, And Seattle Wa. Dates.

1A. plaintiff Communicate with Son After Fall.

1A. Ambulance, Hospital, Surgery Times, pain Medication, Blood work,

1A. Accusation from Council. Explanation from Hospital.

1A City Employee (Manager) (statement)

1A Full years Recovery.

1A Losses,

APPENDIX CONT.

STATEMENT OF CASE. CONT.

PAGE 24.

FUTURE Suffering, Deases, Dignosis, FUTURE Surgery. HELP with (Payment) Hospital Bills.

ARGUMENT

PAGE 25-26-27-28-29

1. Defendant knew.
2. Communication city / owner
3. Contact Between Owner + city.
4. DATE flowing Waters got incontrol By City
5. Safty Sign Posted.
6. Defendant still Fail to Fix Condition. After
7. WORK ORDER'S
8. Defendant Fix other leaks.
9. Defendant Fail to Comply with the Courts of Notice CHANGED legal Documents
10. Injury Date
11. Defendant with Holding INFORMATION
12. RCW Code (Supporting)
13. Utility Cover - City liability.
14. How much Water WAS WASTED (How long)
15. City properties SAFE

APPENDIX CONT.

PAGE-33 -34, 35, 36, 37, 38, 39, 40

CONCLUSION

1A. CLAIM All DAMages

1A. Also TORT Liability. RCW-Follows

1A PAST AND FUTURE EXPENSES

1A DEFendANTS NEGligence.

1A PlAINTIFFS- LIMITED

1A DISTRESS, HUMILIATION AND ANXIETY

1A. THE Supreme Courts DECISION.

1A. STATUE LAW. (CASE)

1A. PlAINTIFF is ASKING THE SUPREME C

1A. RESEARCH-PAST AND FUTURE.

1A TORT LAW RCW Code.

1A UNDER PENALTY of PERJURY (DATED)

APPENDIX 41, 42, 43, 44 45.. 46,

47 48. 49. 50. 51. 52.

PRO SE CASE LAW

2015 APR 15 AM 8:08
CLERK

Found AT. Judicial Immunity WEBSITE

THE Rights to File A LAWSuit PRO SE IS ONE OF THE MOST IMPORTANT Rights UNDER THE CONSTITUTION AND LAWS," PRO SE PLEADINGS ARE TO BE CONSIDERED WITH OUT Regard TO TECHNICALITY. PRO SE litigants' PLEADINGS ARE NOT TO BE HELD to THE SAME HIGH STANDARDS OF PERFECTION AS LAWYERS. PLEADINGS ARE INTENDED TO SERVE AS A means of ARRIVING at FAIR AND JUST SETTLEMENTS OF CONTROVERSIES between litigants THEY should NOT RAISE BARRIERS which prevents THE achievement of THAT END. Proper pleading is IMPORTANT but its IMPORTANCE CONSISTS IN ITS EFFECTIVENESS as a means to accomplish THE END of A JUST JUDGEMENT. Supreme COURT FOUND THAT PRO SE pleading should BE HELD to "LESS STRINGENT STANDARDS" THEN THOSE DRAFTED BY ATTORNEYS. HAINES V KERNER 404 US 520 (1971) MATY V GRASSELLI CHEMICAL CO 303 US 197 (1938) STERGAR V Cullen 481 F. 2d 946 (1973) SIMS V AHERNS 271 SW 720 1925 PUCKETT V COX 4 F. 2d 233 1972 6th CIR