

FILED
SUPREME COURT
STATE OF WASHINGTON
8/19/2022 11:49 AM
BY ERIN L. LENNON
CLERK

IN THE SUPREME COURT
OF THE STATE OF WASHINGTON

Supreme Court No. 101093-1

Court of Appeals No. 83342-1-I

FREEDOM FOUNDATION,

Petitioner,

v.

WASHINGTON FEDERATION OF STATE EMPLOYEES,
COUNCIL 28, *et al.* and WASHINGTON STATE DEPARTMENT
OF RETIREMENT SYSTEMS *et al.*,

Respondents.

**RESPONDENT KING COUNTY'S RESPONSE TO PETITION FOR
DISCRETIONARY REVIEW**

DANIEL T. SATTERBERG
King County Prosecuting Attorney
MARI K. ISAACSON, WSBA #42945
JOHN GERBERDING, WSBA#23157
Senior Deputy Prosecuting Attorney
Attorneys for King County Respondents

King County Prosecuting Attorney
1191 Second Ave, Ste 1700
Seattle, Washington 98101
(206) 477-1120
Mari.Issacson@kingcounty.gov

TABLES OF CONTENTS

I.	IDENTITY OF RESPONDENT.....	2
II.	RESPONSE TO PETITION	2
III.	CERTIFICATE OF COMPLIANCE.....	2

I. IDENTITY OF RESPONDENT

King County (“the County”) is one of the respondents in this case.

II. RESPONSE TO PETITION


The County takes no position on the merits of the Freedom Foundation’s Petition for Discretionary Review and has no objection to review of the underlying matter by this Court.

III. CERTIFICATE OF COMPLIANCE

Pursuant to Rule of Appellate Procedure 18.17, I hereby certify that this document contains 49 words, exclusive of words contained in the title sheet, the table of contents, the certificate of compliance, the certificate of service, and signature blocks.

Respectfully submitted this 19th day of August, 2022.

DANIEL T. SATTERBERG
Prosecuting Attorney


MARI K. ISAACSON, WSBA #42945
JOHN M. GERBERDING, WSBA #23157
Senior Deputy Prosecuting Attorney
Attorneys for King County
King County Prosecuting Attorney
W400 King County Courthouse

516 Third Avenue
Seattle, Washington 98104
(206) 477-1120
Mari.Issacson@kingcounty.gov
John.Gerberding@kingcounty.gov

CERTIFICATE OF SERVICE

The undersigned certifies under penalty of perjury under the laws of the State of Washington that I am now and at all times herein mentioned a resident of the State of Washington, over the age of eighteen (18) years, not a party to or interested in the above-entitled action, and competent to be a witness herein. On the date below, I caused to be served *electronically via clerk's e-portal website* a copy of this RESPONDENT KING COUNTY'S RESPONSE TO PETITION FOR DISCRETIONARY REVIEW upon the following parties and their respective counsel at the e-mail addresses as shown below:

aastrakhan@snoqualmiewa.gov
abrenes@chmelik.com
acruz@unionattorneysnw.com
ADaylong@floyd-ringer.com
adrian.winder@foster.com
aeddy@cityoftacoma.org
ahearne@foster.com
alex.witenberg@snoco.org
Alexandra@KenyonDisend.com
Allen@vanderstoep.com
amuul@floyd-ringer.com
Andream@sumnerwa.gov

angela@lighthouselawgroup.com
angie@ylclaw.com
antoinette@kenyondisend.com
APearce@floyd-ringer.com
appeals@graysharbor.us
arains@ghpud.org
barnard@workerlaw.com
bio.park@mercerisland.gov
bob.noelaw@gmail.com
bob@rbouvattepllc.com
bsterbank@snoqualmiewa.gov
ccomer@cityoftacoma.org
ccowgill@cityofpa.us
cmiller@craiglmiller.com
cmpalmer@kitsap.gov
cpl@pattersonbuchanan.com
cyndi@pfrwa.com
darcey.elliott@atg.wa.gov
david.moon@atg.wa.gov
dkf@pattersonbuchanan.com
dstragier@spokanecity.org
edy@ylclaw.com
emilyg@trustedguidancelaw.com
EvelynFielding.Lopez@atg.wa.gov
gamann@cityoffife.org
grantw@trustedguidancelaw.com
grubstello@omwlaw.com
hillary@kenyondisend.com
hstrasberg@comcast.net
hstrasberg@me.com
james.mcnamara@elaho.wa.gov
james.niemer@soundtransit.org
jaufderh@kitsap.gov
jay@pfrwa.com
jbrown@stevensclay.org
jcombs@cityoffife.org
jdefrang@cityofpa.us
jds@pattersonbuchanan.com
jeff@haggardganson.com
Jennifer.Loynd@piercecountywa.gov
Jessica.Leiser@Seattle.gov

jlebeau@prklaw.com
jmanix61@gmail.com
jmolay@cityofpa.us
jmyers@lldkb.com
joe.brogan@foster.com
joel@ascentllp.com
john.gerberding@kingcounty.gov
john.safarli@courts.wa.gov
jriley@wallawallawa.gov
jwhite@prklaw.com
katie.yount@chelanpud.org
kcomeau@auburnwa.gov
kcpaciv@kitsap.gov
kdetwiler@unionattorneysnw.com
Kelder@freedomfoundation.com
khansen@prklaw.com
kraymond@kirklandwa.gov
laura@mcaloony-law.com
ldunn@bdlaw.com
legal@richardhugheslaw.com
LeighAnn.Tift@seattlehousing.org
lhoober@gth-law.com
lisa@lldkb.com
litdocket@foster.com
LPDarbitration@atg.wa.gov
Lsantangelo@kirklandwa.gov
malolaw@yahoo.com
Margaret@kenyondisend.com
mari.isaacson@kingcounty.gov
marisa.johnson@seattle.gov
maureen.wingler@ci.longview.wa.us
mckenna.filler@foster.com
mdelaba@gcpud.org
michelle@sayrelaw.com
Natalie.brown@kingcounty.gov
nikkit@trustedguidancelaw.com
njohnston@bdlaw.com
noe.robert@ysd7.org
ntillotson@graysharbor.us
patricia@lighthouselawgroup.com
paul.byrne@bothellwa.gov

pcpatvecf@piercecounywa.gov
rachel@madronalaw.com
rbinger@spokanecounty.org
rdavis@chmelik.com
respegard@gth-law.com
revolyef@atg.wa.gov
rick@richardhugheslaw.com
ron@cogdillnicholsfarley.com
rroberts@bdlaw.com
rrysemus@snoco.org
ryann@millcreeklaw.com
scpaappeals@spokanecounty.org
sfaggiano@spokanecity.org
shawn.horlacher@atg.wa.gov
shellyt@rmbllaw.com
sjdivittorio@snopud.com
sjohnson@cityofhoquiam.com
sklotz@floyd-ringer.com
sphilips@freedomfoundation.com
sprosser@craiglmiller.com
srogers@kitsap.gov
tharris@360legalsupport.com
tom@rmbllaw.com
tparson@ghpud.org
tsnow@prklaw.com
valenzuela@workerlaw.com
wbloor@cityofpa.us
weinert@ci.ellensburg.wa.us
zilavy@gmail.com

I declare under penalty of perjury under the laws of the State
of Washington that the foregoing is true and correct.

SIGNED this 19th day of August, 2022 at King County,
Washington



Natalie Brown, Paralegal

KING COUNTY PROSECUTING ATTORNEYS OFFICE CIVIL DIVISION

August 19, 2022 - 11:49 AM

Transmittal Information

Filed with Court: Supreme Court
Appellate Court Case Number: 101,093-1
Appellate Court Case Title: WA Federation of State Employees, et al. v. Freedom Foundation
Superior Court Case Number: 19-2-06100-3

The following documents have been uploaded:

- 1010931_Answer_Reply_20220819114826SC061738_9694.pdf
This File Contains:
Answer/Reply - Answer to Petition for Review
The Original File Name was 08.19.22 KC Response to PFR.pdf

A copy of the uploaded files will be sent to:

- ADaylong@floyd-ringer.com
- APearce@floyd-ringer.com
- Alexandra@KenyonDisend.com
- Allen@vanderstoep.com
- Andream@sumnerwa.gov
- EvelynFielding.Lopez@atg.wa.gov
- Jennifer.Loynd@piercecountywa.gov
- Jessica.Leiser@Seattle.gov
- Kelder@freedomfoundation.com
- LPDarbitration@atg.wa.gov
- LeighAnn.Tift@seattlehousing.org
- Lsantangelo@kirklandwa.gov
- Margaret@kenyondisend.com
- aastrakhan@snoqualmiewa.gov
- abrenes@chmelik.com
- acruz@unionattorneysnw.com
- adrian.winder@foster.com
- aeddy@cityoftacoma.org
- ahearne@foster.com
- alex.witenberg@snoco.org
- amuul@floyd-ringer.com
- angela@lighthouselawgroup.com
- angie@ylclaw.com
- antoinette@kenyondisend.com
- appeals@graysharbor.us
- arains@ghpud.org
- barnard@workerlaw.com
- bio.park@mercerisland.gov
- bob.noelaw@gmail.com
- bob@rbouvattepllc.com
- bsterbank@snoqualmiewa.gov
- ccomer@cityoftacoma.org
- ccowgill@cityofpa.us

- cmiller@craiglmiller.com
- cmpalmer@kitsap.gov
- cpl@pattersonbuchanan.com
- cyndi@pfrwa.com
- darcey.elliott@atg.wa.gov
- david.moon@atg.wa.gov
- dkf@pattersonbuchanan.com
- dstragier@spokanecity.org
- edy@ylclaw.com
- emilyg@trustedguidancelaw.com
- gamann@cityoffife.org
- grantw@trustedguidancelaw.com
- grubstello@omwlaw.com
- hillary@kenyondisend.com
- hstrasberg@comcast.net
- hstrasberg@me.com
- james.mcnamara@elaho.wa.gov
- james.niemer@soundtransit.org
- jaufderh@kitsap.gov
- jay@pfrwa.com
- jbrown@stevensclay.org
- jcombs@cityoffife.org
- jdefrang@cityofpa.us
- jds@pattersonbuchanan.com
- jeff@haggardganson.com
- jlebeau@prklaw.com
- jmanix61@gmail.com
- jmolay@cityofpa.us
- jmyers@lldkb.com
- joe.brogan@foster.com
- joel@ascentllp.com
- john.gerberding@kingcounty.gov
- john.safarli@courts.wa.gov
- jriley@wallawallawa.gov
- jwhite@prklaw.com
- katie.yount@chelanpud.org
- kcomeau@auburnwa.gov
- kcpaciv@kitsap.gov
- kdetwiler@unionattorneysnw.com
- khansen@prklaw.com
- kraymond@kirklandwa.gov
- laura@mcaloon-law.com
- ldunn@bdlaw.com
- legal@richardhugheslaw.com
- lhooper@gth-law.com
- lisa@lldkb.com
- litdocket@foster.com
- malolaw@yahoo.com
- marisa.johnson@seattle.gov
- maureen.wingler@ci.longview.wa.us
- mckenna.filler@foster.com
- mdelaba@gcpud.org
- michelle@sayrelaw.com
- nikkit@trustedguidancelaw.com

- njohnston@bdlaw.com
- noe.robert@ysd7.org
- ntillotson@graysharbor.us
- patricia@lighthouselawgroup.com
- paul.byrne@bothellwa.gov
- pcpatvecf@piercecounywa.gov
- rachel@madronalaw.com
- rbinger@spokanecounty.org
- rdavis@chmelik.com
- respegard@gth-law.com
- revolyef@atg.wa.gov
- rick@richardhugheslaw.com
- ron@cogdillnicholsfarley.com
- rroberts@bdlaw.com
- rrysemus@snoco.org
- ryann@millcreeklaw.com
- scpaappeals@spokanecounty.org
- sfaggiano@spokanecity.org
- shawn.horlacher@atg.wa.gov
- shellyt@rmbllaw.com
- sjdivittorio@snopud.com
- sjohnson@cityofhoquiam.com
- sklotz@floyd-ringer.com
- smack@everettsd.org
- sPhillips@freedomfoundation.com
- sprosser@craiglmiller.com
- srogers@kitsap.gov
- tharris@360legalsupport.com
- tom@rmbllaw.com
- tparson@ghpud.org
- tsnow@prklaw.com
- valenzuela@workerlaw.com
- wbloor@cityofpa.us
- weinert@ci.ellensburg.wa.us
- zilavy@gmail.com

Comments:

Sender Name: Natalie Brown - Email: natalie.brown@kingcounty.gov

Filing on Behalf of: Mari K. Isaacson - Email: mari.isaacson@kingcounty.gov (Alternate Email: Natalie.brown@kingcounty.gov)

Address:

516 3rd avenue Room W-400

Seattle, WA, 98104

Phone: (206) 477-1120

Note: The Filing Id is 20220819114826SC061738