Washington State Supreme Court No. 102695-1
(Court of Appeals, Division I No. 84946-8-I)
(King County No. 22-2-02681-2)

SUPREME COURT
OF THE STATE OF WASHINGTON

KYLE LAGOW,
Plaintiff-Appellant,

v.

HAGENS BERMAN SOBOL SHAPIRO LLP, a Washington limited liability partnership,
Defendant-Respondent.

RESPONDENT'S ANSWER TO MOTIONS FOR EXTENSION OF TIME AND ANSWER TO UNTIMELY PETITION FOR REVIEW

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I. INTRODUCTION

This case has gone on far too long already. In a thorough and well-reasoned unpublished decision, Division One of the Court of Appeals set out all the facts and legal analysis necessary to explain why the trial court properly dismissed Appellant-Petitioner Kyle Lagow's claims. Since Division One's affirmance of the total dismissal of his unsupported claims, Mr. Lagow has nonetheless persisted in seeking reconsideration and making no less than six similarly deficient filings with this Court, including four purported petitions for review, two baseless motions for extension of his time to file, and one filing seeking limited admission of his out-of-state counsel, whose *pro hac vice* petition was denied by the trial court (a decision that was not appealed to Division One) and who has since been suspended from practice in his home state. For all the following reasons, none of Mr. Lagow's filings meet the procedural or substantive requirements for review by this Court, and none have any legal merit.

First, because Mr. Lagow has failed to show the extraordinary circumstances or reasonable diligence required by RAP 18.8(b), the Court should deny his motions for extension of time to file his petition for review. Accordingly, the Court should decline to consider his petitions for review. The Court's analysis can and should stop here.

Second, even if any of Mr. Lagow's petitions were timely—and none are—he fails to articulate why review might be warranted under RAP 13.4, much less does he even cite the rule. It is neither Hagens Berman's nor the Court's burden to seek out authorities of the Court of Appeals or this Court which might possibly conflict with Division One's well-reasoned and unpublished decision terminating review, identify significant questions of law involving the state or federal constitutions posed by Division One's decision, or conceive of issues of substantial public interest posed by the decision. There are none—Mr. Lagow's claims were dismissed on black-letter statute-of-limitations law—and Mr. Lagow has failed to even attempt to

articulate any, instead claiming "[t]here are really no statutes or cases that need be cited." February 21, 2024 7:14 a.m. Petition for Review at 2. There is zero basis for review in this Court and the Court should deny review on the merits if it reaches Mr. Lagow's petition.

Third, by way of a March 4, 2024 "Defendant [sic] Request for Time, Writ of Certiorari, and Permission to Modify the Petition for Review," Mr. Lagow requests a 120-day stay of this matter, a writ of certiorari reversing the trial court's denial of his out-of-state counsel's "Ad Hoc Vice" [sic] petition, and advance permission for his out-of-state counsel to subsequently modify Mr. Lagow's petition. Yet again, Mr. Lagow fails to provide any legal authority supporting application of the rarely-seen writ of certiorari procedure, showing why the trial court's decision rejecting his out-of-state counsel was improper, or supporting his extraordinary request for a 120-day extension and permission to modify his petition for review *after* it is fully

briefed for the Court. All of the relief sought in Mr. Lagow's March 4, 2024 filing should be summarily denied.

In sum, every one of Mr. Lagow's unsupported arguments should be rejected, the Court should decline to accept review, and Hagens Berman should be awarded its attorney fees and costs incurred in response to these filings.

II. RESTATEMENT OF ISSUES

1. As a threshold matter, should the Court deny Mr. Lagow's motions for extension of time to file his petition for review, and dismiss his appeal, where RAP 18.8(b) provides that petitions for review must be filed within 30 days of a decision terminating review, Mr. Lagow failed to file his petition for review within 30 days, and no extraordinary circumstances exist that would excuse Mr. Lagow's delay?

2. Should the Court decline to review Division One's well-reasoned unpublished decision terminating review of Mr. Lagow's claims, where Mr. Lagow fails to identify any grounds under RAP 13.4 warranting review, and none exist?

3. Should the Court reject Mr. Lagow's request to overturn the trial court's decision denying his out-of-state counsel's application for *pro hac vice* admission, enter a 120-day stay of this appeal, and allow his out-of-state counsel to subsequently modify Mr. Lagow's petition for review after being permitted to appear?

4. Should the Court enter an award of attorney fees and costs in Hagens Berman's favor?

III. STATEMENT OF THE CASE

Hagens Berman incorporates by reference the factual background set forth in its Respondent's Brief and Division One's unpublished decision.

In short summary, Hagens Berman previously successfully represented Mr. Lagow in connection with a *qui tam* lawsuit against mortgage lenders that previously employed Mr. Lagow, resulting in a substantial recovery of money for Mr. Lagow. CP 976–77, 914. After explicitly terminating its representation of Mr. Lagow in March 2015, CP 914, Hagens

Berman joined as co-counsel in prosecution of an existing class action lawsuit against various mortgage companies that was unrelated to the *qui tam* litigation but raised a similar theory as was advanced in the *qui tam* litigation. The class action case relied on publicly available information from Mr. Lagow's then-unsealed *qui tam* suit, but Hagens Berman did not rely on any non-public information supplied by Mr. Lagow in the prior litigation. CP 978–79, 986–1072; *see also* CP 923, 937.

As early as 2016, upon learning of Hagens Berman's involvement in the class action, Mr. Lagow began to threaten to file a lawsuit against Hagens Berman for its participation in the class action, wrongly claiming that Hagens Berman had misappropriated his so-called "data" and demanding to be paid from any attorney fees award in the case. *See* CP 926, 929, 931, 941, 950, 954, 958.

Despite his numerous threats in 2016 and 2017, Mr. Lagow did not bring the instant lawsuit until early 2022, well after the statute of limitations for all his claims had expired. In

recognition of that fact, the trial court dismissed nearly all of Mr. Lagow's claims pursuant to CR 12(b)(6), save for his unjust enrichment claim, which it later dismissed on summary judgment. CP 835–37, 1219–21.

Mr. Lagow appealed dismissal of his unjust enrichment claim to Division One. *See* May 1, 2023 "Plaintiff Brief to the Court." Mr. Lagow also argued that the trial court erred in denying his untimely request for production of purported text message communications between himself and Hagens Berman, and seeking reversal of an order allowing his Washington counsel to withdraw after the attorney had submitted a response to Hagens Berman's motion for summary judgment, but before the summary judgment hearing. *Id.*

Division One ruled that the three-year statute of limitations for Mr. Lagow's unjust enrichment claim had run by 2020, ruled the trial court did not abuse its discretion in allowing Mr. Lagow's Washington counsel to withdraw, and rejected his arguments regarding additional discovery as unsupported by any

legal authority. Slip Op. at 4–9. Division One noted that Hagens Berman's requests for fees and costs against Mr. Lagow for filing a frivolous appeal was "a close question," but denied such request in light of precedent instructing it to "resolve doubts about frivolous appeals in favor of the appellant." Slip Op. at 10.

Apparently undeterred by Division One's observation that it was a "close question" as to whether his overwhelming failure to comply with the Rules of Appellate Procedure rendered his appeal frivolous, Mr. Lagow has lodged at least six sundry filings in this Court, none of which have complied with the applicable rules.

On January 3, 2024, Mr. Lagow filed a motion for a 30-day extension of his time to file his petition for review. By letter ruling of the same day, the Court "advised that no ruling is being made at this time on the Petitioner's motion for an extension of time to file a petition for review," that a Department of the Court would consider Mr. Lagow's motion for extension if he filed a proposed petition for review and paid the filing fee by

February 21, 2024, and that "the Court will only consider the petition for review if it first decides to grant the motion for extension of time."

Mr. Lagow thereafter filed four different purported versions of a proposed petition for review in sequence: Two submitted on February 21, 2024, a putative first amended petition submitted February 22, 2024, and a putative second amended petition submitted February 29, 2024. By letters of February 23 and March 1, the Court made clear to Mr. Lagow that it would strike his first and second amended petitions for review, but consider the second petition for review that Mr. Lagow submitted on February 21, 2024, at 7:14 a.m.

On March 4, 2024, Mr. Lagow filed a document titled "Defendant Request for Time, Writ of Certiorari, and Permission to Modify the Petition for Review." The Court directed Hagens Berman to submit a response to the "motion for extension to file petition for review, the untimely petition for review filed on February 21, 2024, and the motion filed on March 4, 2024" by

April 3, 2024, and invited Hagens Berman to submit a combined answer to the foregoing filings if it wished.

As authorized by the Court's March 4 letter, Hagens Berman submits this combined answer to each of Mr. Lagow's filings.

IV. ARGUMENT

A. The Court Should Deny Mr. Lagow's Motion for Extension and Decline to Consider his Petition for Review.

RAP 18.8 counsels that the Court should only in the rarest circumstances extend the time allowed to submit a petition for review:

> The appellate court will ***only in extraordinary circumstances and to prevent a gross miscarriage of justice*** extend the time within which a party must file a notice of appeal, a notice for discretionary review, a motion for discretionary review of a decision of the Court of Appeals, a petition for review, or a motion for reconsideration. ***The appellate court will ordinarily hold that the desirability of finality of decisions outweighs the privilege of a litigant to obtain an extension of time under this section***.

RAP 18.8(b) (emphasis added). "Extraordinary circumstances" exist when "the filing, despite reasonable diligence, was defective due to excusable error or circumstances beyond the party's control. In such a case, the lost opportunity to appeal would constitute a gross miscarriage of justice because of the appellant's reasonably diligent conduct." *Beckman ex rel. Beckman v. State, Dep't of Soc. & Health Servs.*, 102 Wn. App. 687, 694, 11 P.3d 313 (2000) (quoting *Reichelt v. Raymark Indus., Inc.*, 52 Wn. App. 763, 765–66, 764 P.2d 653 (1988)).

Here, Mr. Lagow has not articulated—let alone demonstrated—extraordinary circumstances or reasonable diligence. Mr. Lagow's January 3 motion for an extension stated simply: "The Plaintiff received the notice from the court denying appeal and notifying the Plaintiff of 30 days deadline to file appeal under the rules and guidelines noted by the court. The Plaintiff is attempting the [sic] access data previously not available to the Plaintiff and then prepare the appeal and hereby asks the court for an additional to file the final appeal."

Mr. Lagow's motion did not identify any excusable error or circumstances beyond his control warranting an extension, or any reasonable efforts made to obtain the "data" (assuming, *arguendo*, that he would even be able to introduce new evidence on this second-level appeal of the trial court's summary judgment order despite RAP 9.12). Accepting for the sake of argument that his need for "data" could constitute extraordinary circumstances (which is dubious at best), none of his subsequent four petitions for review appear to rely on any "data," such as it were, that was unavailable to Mr. Lagow when he took his appeal to Division One. Instead, the petitions rehash the same arguments he made below, based on the exact same set of facts. No extraordinary circumstances exist.

The Court has already indicated, in its letter sent to the parties March 4, that even Mr. Lagow's second petition for review submitted February 21 was "untimely." Because no "extraordinary circumstances" exist, because Mr. Lagow has not demonstrated "reasonable diligence," and because Hagens

Berman has a valid interest in the timely disposition of this action as is explicitly recognized by RAP 18.8(b), the Court should deny Mr. Lagow's motion and dismiss this appeal as untimely. *Matter of Marriage of Orate*, 11 Wn. App. 2d 807, 814, 455 P.3d 1158 (2020) ("Ordinarily, the proper remedy for an untimely appeal is dismissal of the appeal."). The Court's analysis can and should stop here.

B. Mr. Lagow Fails to Identify Any Provision of RAP 13.4 Warranting Review of Division One's Unpublished Decision.

RAP 13.4 provides that this Court will accept a petition for review *only* in the following circumstances: (1) If the decision of the Court of Appeals is in conflict with a decision of the Supreme Court; (2) If the decision of the Court of Appeals is in conflict with a published decision of the Court of Appeals; (3) If a significant question of law under the Constitution of the State of Washington or of the United States is involved; or (4) If the petition involves an issue of substantial public interest that should be determined by the Supreme Court. RAP 13.4(b).

Even when construed as broadly as possible, Mr. Lagow's petition for review[1] fails to identify or make argument regarding any provision of RAP 13.4. Instead, he wrongly asserts that "[t]here are really no statutes or cases that need be cited." Mr. Lagow is incorrect, as "[f]ailure to identify specific legal issues or cite applicable authority may preclude appellate review." *State v. Marintorres*, 93 Wn. App. 442, 452, 969 P.2d 501 (1999). Indeed, his petition effectively argues for reconsideration of the trial court's and Division One's rulings that his claims are barred by the applicable statutes of limitation and denying him additional and unnecessary discovery—a classic effort to obtain a "second bite at the apple." This is contrary to the plain text of RAP 13.4, which envisions appellate review in this Court occurring only when petitioners identify conflicts in published legal authority, constitutional issues, or

[1] Hagens Berman directs its argument towards Mr. Lagow's February 22, 2024, 7:14 a.m. petition for review, the only petition for review not stricken by the Commissioner of this Court.

issues of public importance implicated by a Court of Appeals decision.

Moreover, it simply is not Hagens Berman's nor this Court's burden to identify evidence or legal authorities that might fulfill the stringent requirements for review under RAP 13.4. *Saunders v. Lloyd's of London*, 113 Wn.2d 330, 345, 779 P.2d 249 (1989) (a court need not search through the record for evidence relevant to a litigant's arguments or for applicable legal authorities); *see also Christian v. Tohmeh*, 191 Wn. App. 709, 728, 366 P.3d 16 (2015) ("Passing treatment of an issue or lack of reasoned argument is insufficient to merit appellate review."); *State v. Camarillo*, 54 Wn. App. 821, 829, 776 P.2d 176 (1989) (courts may likewise decline to consider issues unsupported by references to the record). It makes no difference that Mr. Lagow is now proceeding *pro se* (though represented previously by at least two law firms) in pursuit of review by this Court, as self-represented litigants are held to the same standards as attorneys and must comply with all procedural rules on appeal.

In re Marriage of Olson, 69 Wn. App. 621, 626, 850 P.2d 527 (1993). Mr. Lagow's failure to carry his burden of connecting legal authority, fact, and argument to the RAP 13.4 standard is fatal to his request for review.

More fundamentally, even if one of the criteria for review by this Court were present, review would still be inappropriate. Division One's holdings regarding these same issues raised in Mr. Lagow's petition for review are well-reasoned, well-supported, and correct under longstanding black-letter law.

As to the dismissal of Mr. Lagow's unjust enrichment claim, unjust enrichment is subject to a three-year statute of limitations. RCW 4.16.080(3); *Seattle Prof'l Eng'g Emps. Ass'n v. Boeing Co.*, 139 Wn.2d 824, 837–38, 991 P.2d 1126 (2000). The "discovery rule" applies to unjust enrichment claims, and thus, the statute of limitations begins to run when "the plaintiff, using reasonable diligence, should have discovered the cause of action." *Hart v. Clark County*, 52 Wn. App. 113, 117, 758 P.2d 515 (1988) (citing *Peters v. Simmons*, 87 Wn.2d 400, 404, 552

P.2d 1053 (1976)). The claimant need "merely [have] knowledge of the facts necessary to establish the elements of the claim" for the cause of action to begin to accrue. *Douchette v. Bethel Sch. Dist. No. 403*, 117 Wn.2d 805, 814, 818 P.2d 1362 (1991). The three-year statute of limitations for this claim began to run as early as 2016, when Mr. Lagow asserted to Hagens Berman via email that "you guys are about to make a lot of money off my data." CP 926. If there were any question about this, the statute of limitations unquestionably began to run no later than November 2017, when Mr. Lagow sent Hagens Berman an accusatory email virtually reciting the elements of unjust enrichment and threatening litigation:

> If the firm really has convinced itself that this is right, ***that they should profit while I am excluded and should be allowed to use the benefit of everything I shared with the firm and effectively moved its position on the appraisal fraud***, then maybe it is time that there was a consequence.

CP 950 (emphasis added).[2]

[2] Three elements are required to prove a cause of action for unjust enrichment: "(1) the defendant receives a benefit, (2) the

Mr. Lagow filed suit nearly four and a half years later, in February 2022. CP 24–32. Accordingly, Division One properly affirmed dismissal of Mr. Lagow's unjust enrichment claim on clearly-established statute of limitations grounds, and no conceivable constitutional issues or issues of substantial public importance exist. Denial of review in relation to this claim is proper.

As to Mr. Lagow's claim that he should receive discovery of purported text messages (to which he is a party) which he alleges would "prove" his claims, Division One again properly dismissed this claim on grounds that he "does not cite to the record on appeal or any relevant legal authority to support this argument and, essentially and belatedly, asks us to take his word that further evidence may vindicate his claims." Slip Op. at 9–

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received benefit is at the plaintiff's expense, and (3) the circumstances make it unjust for the defendant to retain the benefit without payment." *Young v. Young*, 164 Wn.2d 477, 484-85, 191 P.3d 1258 (2008).

10 (citing *Cook v. Brateng*, 158. Wn. App. 777, 794, 262 P.3d 1228 (2010) for the proposition that "we do not consider arguments unsupported by references to the record, meaningful analysis, or citation to pertinent authority."). Mr. Lagow again fails to provide any authority supporting his discovery argument, or any authority suggesting Division One erred by rejecting his unsupported argument. Mr. Lagow suggests that "[b]asic principles of due process" compel such production, but again, fails to provide any legal authority in support of his argument. *DeHeer v. Seattle Post-Intelligencer*, 60 Wn.2d 122, 126, 372 P.2d 193 (1962) ("Where no authorities are cited in support of a proposition, the court is not required to search out authorities, but may assume that counsel, after diligent search, has found none."). And finally, he fails to establish why his untimely request for production of purported text messages implicates any issues of substantial public importance.[3]

[3] Moreover, as Hagens Berman pointed out below, to the extent Mr. Lagow's arguments relative to the supposed subject text

In sum, even if Mr. Lagow's petition for review were timely—and it is not—review in this Court would still be inappropriate because Mr. Lagow failed to articulate grounds for review under RAP 13.4 and there is no conceivable basis for review of Division One's well-reasoned opinion.

C. The Court Should Deny Mr. Lagow's "Defendant Request for Time, Writ of Certiorari, and Permission to Modify the Petition for Review."

The above-titled filing submitted by Mr. Lagow seeks a 120-day stay of his appeal, reversal of the trial court's decision denying *pro hac vice* admission of his out-of-state counsel, and advance permission for that out-of-state counsel to subsequently

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messages are best construed as CR 56(f) requests to continue the hearing on Hagens Berman's motion for summary judgment, they should still be summarily rejected because the email correspondence Hagens Berman submitted to the trial court shows Mr. Lagow was unquestionably aware of the factual basis for his purported unjust enrichment claim for at least four years before he filed suit. No subsequent text messages between the parties could change that fact—the bell cannot be "unrung" for purposes of the discovery rule.

modify Mr. Lagow's petition for review. The Court should deny the relief requested in this filing.

First, the Court should deny Mr. Lagow's writ of certiorari seeking reversal of the denial of admission of his out-of-state counsel, Timothy McIlwain. Mr. Lagow has provided no authority that the narrow and archaic writ of certiorari procedure in article IV, section 6 of Washington's Constitution and RCW chapter 7.16 applies in these circumstances. *DeHeer*, 60 Wn.2d at 126 ("Where no authorities are cited in support of a proposition, the court is not required to search out authorities, but may assume that counsel, after diligent search, has found none."). And substantively, the writ of certiorari procedure applies only where a lower court is alleged to have "exceeded [its] jurisdiction," "act[ed] illegally," or engaged in an "erroneous or void proceeding" and there is "no appeal" and no "plain, speedy and adequate remedy at law." RCW 7.16.040; *see also Clark Cnty. Pub. Util. Dist. No. 1 v. Wilkinson*, 139 Wn.2d 840, 846, 991 P.2d 1161 (2000) (writ of certiorari procedure

authorizes appellate review only where "the petitioner can allege facts that, if verified, establish the lower tribunal's decision was arbitrary and capricious or illegal.").

As detailed in Hagens Berman's Respondent's Brief (though not addressed by Division One's opinion), the trial court's decision denying Mr. McIlwain's petition for *pro hac vice* admission was not an abuse of discretion, arbitrary, or capricious, and certainly was not illegal. Mr. McIlwain has a pattern of abusive and harassing conduct toward opposing parties and a longstanding vendetta against Hagens Berman which had already resulted in the imposition of sanctions against him and the revocation of *pro hac vice* status in another jurisdiction. *See* CP 56–391; *Hahn v. Boeing Co.*, 95 Wn.2d 28, 33, 621 P.2d 1263 (1980) (trial judge before whom an application for *pro hac vice* admission is filed has discretion to deny or grant that application). Indeed, it is unclear whether Mr. McIlwain could even be admitted to practice on a limited basis in Washington given that the New Jersey bar previously suspended

Mr. McIlwain's license to practice in 2023 due to his filing of frivolous lawsuits. *See In the Matter of McIlwain*, 254 N.J. 432, 297 A.3d 380 (Mem) (2023).[4] Mr. Lagow's statements that Mr. McIlwain has not been sanctioned in any court are demonstrably false, and his outrageous suggestion that Hagens Berman or its counsel "called in favors" to have Mr. McIlwain's *pro hac vice* application denied is libelous. There is no factual or legal basis to reverse the trial court's rejection of Mr. McIlwain's petition and Mr. Lagow's request for a "writ of certiorari" should be denied.

Second, Mr. Lagow's request for a 120-day stay to engage counsel and permission to file a modified petition for review upon appointment of counsel is, in effect, another request for extension of the deadlines to file his petition for review. This

[4] Bizarrely, in an email sent to Hagens Berman just before the trial court's summary judgment hearing, Mr. Lagow asked *Hagens Berman* if it would represent him in a malpractice suit *against Mr. McIlwain* arising out of McIlwain's representation of Mr. Lagow in his suit against Hagens Berman. CP 1216. Hagens Berman did not respond.

request should be denied under RAP 18.8(b) for all the same reasons his January 3, 2024 motion for an extension should be denied. In addition, obvious prejudice to Hagens Berman would result if Mr. Lagow were allowed to file a modified petition for review *after* Hagens Berman filed a response detailing the reasons why review should not be accepted. Just as importantly, as recognized by RAP 18.8(b), Hagens Berman has a valid interest in the finality of these proceedings, which would be undermined by an inappropriate extension of time to permit Mr. Lagow to re-file or "modify" his petition for review. The time has come for Mr. Lagow's crusade to end.

The Court should deny the relief requested in Mr. Lagow's March 4, 2024 submission.

D. Hagens Berman is Entitled to its Attorney Fees and Costs Incurred in Response to Mr. Lagow's Various Filings.

In submitting his series of briefs to this Court, it is evident that Mr. Lagow failed to heed any of Division One's repeated warnings that *pro se* litigants are held to the same standard as any

attorney in Washington State, ignored the numerous times Division One stated a party must present argument supported by fact and law in order to be considered, and disregarded Division One's admonition that it is a "close question" as to whether his appeal was so frivolous that Hagens Berman should be awarded its fees and costs. The series of filings submitted to this Court again knowingly fail to apply any law to his claims, fail to raise any new arguments, and fail to engage with the applicable standards governing review in any manner whatsoever. The Court would be hard-pressed to find a better "poster child" for the concept of a frivolous appeal.

While recognizing that doubts about frivolity are resolved in favor of the appellant, Hagens Berman submits that without a proper financial deterrent, Mr. Lagow will continue to make slanderous and frivolous filings and in so doing, waste the resources of Hagens Berman and the courts of Washington State. Indeed, Hagens Berman has legitimate concerns that even after this Court finally terminates review of his claims, Mr. Lagow

will continue to seek relief by way of additional filings in flagrant violation of the applicable rules, which continue to impose a considerable and wholly-unnecessary burden on Hagens Berman to explain the actual facts of this matter and the applicable law.

Accordingly, Hagens Berman respectfully requests that the Court enter an award of attorney fees and costs against Mr. Lagow in relation to Hagens Berman's time incurred in responding to his filings in this Court. RAP 18.1(b); *see also* RAP 18.9(a) (authorizing awards of terms, compensatory damages, and/or sanctions against any party that "files a frivolous appeal, or fails to comply with these rules").

V. CONCLUSION

For the foregoing reasons, this Court should deny the relief sought by Mr. Lagow's motion for extension, petitions for review, and filing dated March 4, 2024, and enter an award of attorney fees and costs against Mr. Lagow.

This document contains 4,488 words, excluding the parts of the document exempted from the word count by RAP 18.17.

Dated this 3rd day of April, 2024.

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DECLARATION OF SERVICE

On the date below, I caused a true and correct copy of the foregoing Respondent's Answer to Motions for Extension of Time and Answer to Untimely Petition for Review to be served on the following via WA Supreme Court Secure Portal and electronic mail:

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DATED this 3rd day of April, 2024, at Seattle, Washington.

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