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STATE OF WASHINGTON
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**IN THE SUPREME COURT
OF THE STATE OF WASHINGTON**

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SUPREME COURT NO. 89927-4
COURT OF APPEALS NO. 31339-5-III

BEDREDDIN IMAN and SAMEER HATEM, Petitioners,

and

MUSLIM AMERICA, Petitioner,

v.

TOWN OF SPRINGDALE, Respondent

NOTICE OF ERRATA

BEDREDDIN IMAN
SAMEER HATEM
Appellants, *pro se*

Dawud Ahmad & Associates
Post Office Box 522
Springdale, Washington 99173-0522
(509) 258-9031 law@muslimamerica.net

1. IDENTITY OF NOTIFYING PARTY

Petitioners Bedreddin Iman and Sameer Hatem (“Petitioners”) seek to notify this Court of two errors in their Petition for Review filed on March 10, 2014. These errors are designated in Part 2.

2. NOTICE OF ERRATA

On page 12 of their Petition, Petitioners wrote, “This Court has affirmed such protection well before the enactment of RLUIPA, stating that “[t]he use, building or conversion of real property for the purpose of religious exercise shall be considered to be the religious exercise of the *person* or entity that uses or intends to use the property for that purpose,” thereafter citing *City of Sumner v. First Baptist Church of Sumner*, *Washington*, 97 Wn.2d 1, 630 P.2d 1358 (1982) as well as RLUIPA, 42 U.S.C. § 2000cc-5(7)(B). While RLUIPA does include this statement, *Sumner* does not.

On page 11 of their Petition, Petitioners include a citation that reads “*International Association of Firefighters, Local 1789 v. Spokane Airport*, 146 Wn.2d 207, 212 (fn. 3).” Petitioners failed to cite the year of this Published Opinion, which is 2002.

3. PURPOSE OF NOTICE

Petitioners submit that failure to notify this Court of these errors may

lead it to conclude that they intentionally submitted a misleading and incomplete argument. As such, they find it necessary to inform the Court of their errors before their argument is subject to further scrutiny.

DATED this 8th day of April, 2014.

Respectfully submitted,



BEDREDDIN IMAN
Appellant, *pro se*



SAMEER HATEM
Appellant, *pro se*

Dawud Ahmad & Associates
Post Office Box 522
Springdale, Washington 99173-0522
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CERTIFICATE OF SERVICE

I certify that on this day, April 8, 2014, I served a copy of the foregoing **Notice of Errata** to the parties of this proceeding or their counsel as shown:

Jeffry Finer
West 35 Main, Suite 300
Spokane, Washington 99201

By eMail attachment to
jeffry@finer-bering.com

John McLean Riley III
Nathan Graham Smith
422 W. Riverside, Suite 1100
Spokane, Washington 99201-0302


RAQEEBAH AMATALLAH

OFFICE RECEPTIONIST, CLERK

To: Bedreddin Iman
Subject: RE: 899274_Notice of Errata

Received 4-9-14

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.

-----Original Message-----

From: Bedreddin Iman [mailto:bedreddin@muslimamerica.net]
Sent: Wednesday, April 09, 2014 2:00 PM
To: OFFICE RECEPTIONIST, CLERK; Jeffry Finer
Subject: 899274_Notice of Errata

To The Clerk of The Supreme Court:

Enclosed please find Petitioners' Notice of Errata in the matter of Bedreddin Iman, et al. v. Town of Springdale (No. 89927-4), filed this day, April 9, 2014.

Thank you.

Sincerely,
Bedreddin Iman

FILED
 COURT OF APPEALS
 DIVISION II

2012 AUG -6 PM 1:20

STATE OF WASHINGTON
 NO. 43280-3-II

BY _____
 COURT OF APPEALS STATE OF WASHINGTON

RACHEL MARGUERITE ANDERSON
 (formerly RACHEL M. RODGERS),

Appellant,

v.

WILLIAM L. E. DUSSAULT and JANE DOE DUSSAULT, husband and wife, and the marital community composed thereof; BARBARA J. BYRAM and JOHN DOE BYRAM, wife and husband, and the marital community composed thereof; YEVGENY JACK BERNER and JANE DOE BERNER, husband and wife, and the marital community composed thereof; WILLIAM L. E. DUSSAULT, PS, a Washington professional service corporation; the DUSSAULT LAW GROUP, a Washington corporation; RICHARD MICHAEL McMENAMIN and SHARI L. McMENAMIN, husband and wife, and the marital community composed thereof; McMENAMIN & McMENAMIN PS, a Washington professional service corporation; ANDREA DAVEY (fka ANDREA RODGERS) and JOHN DOE DAVEY, husband and wife, and the marital community composed thereof; and WELLS FARGO BANK, N.A., a foreign corporation,

Respondents.

BRIEF OF RESPONDENTS DUSSAULT

Sam B. Franklin, WSBA No. 1903
 William L. Cameron, WSBA No. 5108
 Of Attorneys for Respondents Dussault

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