

Thu 3/27/2014 9:15
AM

NO. 43983-2-II

Received
Washington State Supreme Court

MAR 31 2014

Ronald R. Carpenter
Clerk

90054-0

COPY

**COURT OF APPEALS, DIVISION II
STATE OF WASHINGTON**

JOYCE KELLEY, Individually, Respondent,

v.

PIERCE COUNTY, a county corporation, and MARK SKAGREN AND "JANE DOE"
SKAGREN

And the marital community composed thereof, Petitioners.

PETITION FOR REVIEW

JOINDER WITH PIERCE COUNTY

By
CHRISTOPHER KEAY
Attorney for Petitioners Shagren

2115 North 30th St. Ste. 101
Tacoma, WA 98403
253-572-5323

COPY

A. IDENTITY OF PETITIONER

Defendants Mark and "Jane Doe" Skagren (hereinafter "Shagren"), husband and wife, and the marital community comprised thereof.

B. COURT OF APPEALS DECISION.

Defendants Shagren join in Defendant Pierce County's Petition for Review in the above matter of the February 20, 2014 partly published opinion of Division Two of the Washington State Court of Appeals, in *Kelley v. Pierce County* __ Wn.App. __, 319 P.3d 74 (2014), Numbers 43983-2-II, 43986-7-II, converting a CR 12(b)(6) motion to dismiss into a CR 56 summary judgment motion and affirming the refusal to dismiss a guardian ad litem and his employer because it found absolute quasi-judicial immunity does not apply if sexual harassment is alleged.

C. ISSUES PRESENTED FOR REVIEW.

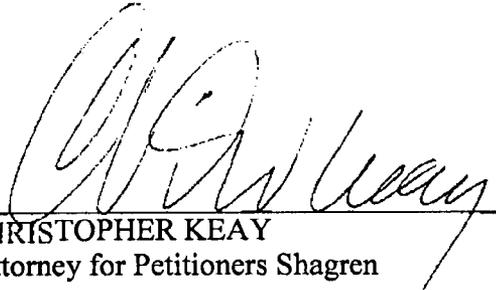
Defendants Shagren agree generally with the statement of reasons and issues set forth in Defendant Pierce County's PETITION FOR REVIEW and generally incorporates those statements in Shagrens' own PETITION FOR REVIEW.

D. CONCLUSION

Shagren concurs with Pierce County that discretionary review is appropriate under RAP 13.4(b)(1), (b)(2) and (b)(4), and joins in the same and respectfully requests the Court accept review of the aforementioned decision.

DATED this 26th day of March, 2014.

By

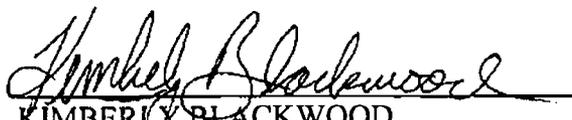

CHRISTOPHER KEAY
Attorney for Petitioners Shagren

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing PETITION FOR REVIEW was delivered to ABC Legal Messengers on this 27th day of March with appropriate instruction to forward the same to counsel for plaintiff and counsel for defendant Pierce County as follows:

THADDEUS P. MARTIN
LAW OFFICES OF THADDEUS P. MARTIN & ASSOCIATES
4928 109TH ST. SW
LAKEWOOD, WA 98499

DANIEL R. HAMILTON
PIERCE COUNTY PROSECUTOR'S OFFICE
CIVIL DIVISION, SUITE 301
955 TACOMA AVE. SOUTH
TACOMA, WA 98402-2160


KIMBERLY BLACKWOOD
Paralegal to Christopher Keay
Johnson, Graffe, Keay, Moniz & Wick