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Case No. 90512-6

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THE SUPREME COURT OF THE STATE OF WASHINGTON

HERBERT HEINTZ AND BARBARA HEINTZ, HIS WIFE,

Petitioners,

vs.

JPMORGAN CHASE BANK, N.A., et. al.

Respondents.

Appeal from an Order of the King County Superior Court
Case No. 12-2-39861-5SEA

**RESPONDENT QUALITY LOAN SERVICE CORPORATION OF
WASHINGTON'S ANSWER TO PETITIONER'S MOTION FOR
DISCRETIONARY REVIEW**

Joseph Ward McIntosh, WSBA #39470
Attorney for Respondent Quality Loan Services Corp. of Washington
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 ORIGINAL

I. ANSWER

COMES NOW Respondent Quality Loan Service Corporation of Washington ("Quality") and opposes Petitioners' Motion for Discretionary Review.

The grounds for seeking review are enumerated in RAP 13.4(b)(1)-(4).

They are as follows:

- (1) If the decision of the Court of Appeals is in conflict with a decision of the Supreme Court; or
- (2) If the decision of the Court of Appeals is in conflict with another decision of the Court of Appeals; or
- (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.

Respondents in their motion for discretionary review fail to identify any of the above grounds for review. Instead, Respondents simply restate their legal arguments that were rejected by Division I.

This is a straightforward case involving a breach of contract and non-judicial foreclosure. There is no split in authorities, nor is there a significant question of law under the State or U.S. Constitution. Furthermore, Division I correctly applied the law in affirming the trial court, and there is no basis for Supreme Court review.

II. CONCLUSION

For the foregoing reason, there are no grounds for discretionary review,
and it should be denied.

Dated: August 8, 2014

Respectfully Submitted,
McCarthy & Holthus, LLP

By: 
Joseph Ward McIntosh, WSBA # 39470
Attorney for Quality Loan Service
Corporation of Washington

CERTIFICATE OF SERVICE

I certify that on August 8, 2014, I served a copy of the foregoing document, described as **RESPONDENT QUALITY LOAN SERVICE CORPORATION OF WASHINGTON'S ANSWER TO PETITIONER'S MOTION FOR DISCRETIONARY REVIEW**, on the following persons by USPS Mail and Email:

Adam Hughes
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Robert H. Stevenson
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I declare under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct and that this Declaration was executed in Seattle, Washington.

Dated: August 8, 2014

/s/ Lindsay Wilson
Lindsay Wilson
Legal Assistant
McCarthy & Holthus, LLP

OFFICE RECEPTIONIST, CLERK

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Good afternoon,

Attached please find Respondent Quality Loan Service Corp. of WA's Answer to Petitioner's Motion for Discretionary Review by attorney Joseph McIntosh, WSBA# 39470. A hard copy will follow to counsels.

Thank you,

Lindsay Wilson | Civil Attorney Assistant
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Should escalation be required, please contact the following individual
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