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SUPREME COURT
STATE OF WASHINGTON
Nov 05, 2014, 1:11 pm
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Supreme Court of State of Washington No. 90934-2

No. 44346-5-II

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

TORRE J. WOODS, individually,

Appellant,

v.

**HO SPORTS COMPANY, INC., a for-profit Washington
Corporation,**

**Respondent,
And**

MICHAEL E. WOODS, individually,

Respondent.

ERRATA TO AMENDED ANSWER TO PETITION FOR REVIEW

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 ORIGINAL

The following Errata is submitted by Respondent, Michael Woods, to correct editing errors and/or add additional text to Answer To Petition For Review, which was filed on October 23, 2014.

Corrections/Additions are as follows:

Page 2

ORIGINAL TEXT:

**A. IDENTITY OF ANSWERING PARTY
AND CROSS-PETITIONER**

Michael Woods, individually, Co-Defendant below, provides the following response to Co-Defendant HO Sports Company, Inc.'s Petition for Review, and the following Cross-Petition for Review.

REVISED TEXT:

**A. IDENTITY OF ANSWERING PARTY
AND CROSS-PETITIONER**

Michael Woods, individually, Co-Defendant below, provides the following Answer to Co-Defendant HO Sports Company, Inc.'s Petition for Review.

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Page 2

ORIGINAL TEXT:

C. ISSUES PRESENTED FOR REVIEW

REVISED TEXT:

C. ISSUES PRESENTED IN ANSWER FOR REVIEW
(RAP 13.4 (d))

Page 4

ORIGINAL TEXT:

E. ARGUMENT WHY THE COURT SHOULD GRANT
REVIEW

1. Introduction.

Co-Defendant Michael Woods respectfully agrees with HO Sports that the Court should grant review in this case, but not solely with respect to the issue raised by HO Sports. Parental immunity and its implications, particularly as it relates to potential allocation of fault at time of trial, involves a matter of substantial public interest within the meaning of RAP 13.4(b)(4). To date, what has transpired in this case, serves to illustrate the substantial amount of uncertainty that still exists within the State of Washington with respect to “parental immunity.” This case provides an appropriate opportunity for the Supreme Court to provide substantial clarity and guidance on how “parental immunity” issues should be navigated in the future.

REVISED TEXT:

E. ARGUMENT WHY THE COURT SHOULD GRANT REVIEW OF ISSUES PRESENTED IN THIS ANSWER – (RAP 13.4 (d)).

1. Introduction.

Co-Defendant Michael Woods respectfully agrees with HO Sports that the Court should grant review in this case, but not solely with respect to the issue raised by HO Sports. Parental immunity and its implications, particularly as it relates to potential allocation of fault at time of trial, involves a matter of substantial public interest within the meaning of RAP 13.4(b)(4). To date, what has transpired in this case, serves to illustrate the substantial amount of uncertainty that still exists within the State of Washington with respect to “parental immunity.” This case provides an appropriate opportunity for the Supreme Court to provide substantial clarity and guidance on how “parental immunity” issues should be navigated in the future. Under the terms of RAP 13.4 (d), the Supreme Court should consider the issues raise in this Answer.

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Page 12-13

ORIGINAL TEXT:

F. CONCLUSION

For the reasons stated above, Co-Defendant Michael Woods does not object to HO Sports' Petition for Review, to the extent the Supreme Court determines that it has appropriate "standing" to raise the question of parental immunity at all. Further, Co-Defendant Michael Woods respectfully requests that the Supreme Court grant his Cross-Petition for Review which will afford the Supreme Court an opportunity to resolve many unanswered questions regarding "parental immunity," which, if unanswered, have the potential of plaguing our courts for years to come.

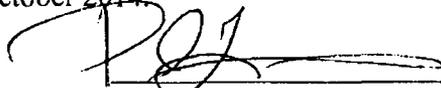
REVISED TEXT:

F. CONCLUSION

For the reasons stated above, Co-Defendant Michael Woods does not object to HO Sports' Petition for Review, to the extent the Supreme Court determines that it has appropriate "standing" to raise the question of parental immunity at all. Further, Co-Defendant Michael Woods respectfully requests that the Supreme Court consider the issues raised in this Answer, which will afford the Supreme Court an opportunity to resolve many unanswered questions regarding "parental immunity,"

which, if unanswered, have the potential of plaguing our courts for years to come.

Dated this 30th day of October 2014.



Paul A. Lindenmuth, WSBA# 15817
Of Attorneys for Respondent
Michael E. Woods

DECLARATION OF SERVICE

I, **MARILYN DELUCIA**, hereby declares under the penalty of perjury under the laws of the State of Washington that the following is true and correct:

That I am over the age of 18 years of age, have personal knowledge of the facts herein, and am competent to testify thereto.

I am a paralegal working for the The Law Offices of Ben F. Barcus & Associates, PLLC.

On the 5th day of November, 2014, a true and correct copy of the **ERRATA TO ANSWER TO PETITION FOR REVIEW** was sent for delivery as indicated to the following:

Original filed via email to:
Original filed via email to:
Supreme Court of the State of Washington
Supreme@courts.wa.gov

Via email and U.S. Mail to the following:
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DATED this 5th day of November, 2014.

A handwritten signature in black ink, appearing to read 'Marilyn DeLucia', is written over a horizontal line.

Marilyn DeLucia, Paralegal
The Law Offices of Ben F. Barcus & Associates, PLLC.

OFFICE RECEPTIONIST, CLERK

To: Marilyn DeLucia
Subject: RE: Woods v. Ho and Woods - Case No. 90934-2- Amended Answer to Petition for Review;
Errata to Amended Answer to Petition for REview

Rec'd 11/5/14

From: Marilyn DeLucia [mailto:Marilyn@benbarcus.com]

Sent: Wednesday, November 05, 2014 1:12 PM

To: OFFICE RECEPTIONIST, CLERK

Cc: Paul Lindenmuth; nroberts@connelly-law.com; pwells@connelly-law.com; tmerrick@mhlseattle.com;
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Subject: RE: Woods v. Ho and Woods - Case No. 90934-2- Amended Answer to Petition for Review; Errata to Amended
Answer to Petition for REview

Please see attached.

Marilyn Zimmerman

Office Administrator/Paralegal

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