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STATE OF WASHINGTON
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NO. 91959-3

**SUPREME COURT
STATE OF WASHINGTON**

**KEVIN PORTER,
Respondent
v.
NATHANIAL (NATE) BOISSO, PERSONAL
REPRESENTATIVE OF THE ESTATE OF CHARLES BOISSO,
Petitioner**

IN RE THE ESTATE OF CHARLES R. BOISSO

ANSWER OF RESPONDENT TO PETITION FOR REVIEW

**Stephen A. Burnham, WSBA #13270
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I. INTRODUCTION

A. Request for Review should be Denied .

The Respondent, Kevin Porter (“Porter”), requests this court decline the Petition for Review because it does not meet the legal standards for review under RAP 13.4(b) because there are no legal issues of state-wide significance, or conflicts between appellant court decisions or constitutional issues for this Court to consider. After briefing was complete in this case at the Court of Appeals, this Supreme Court decided *Ralph v. State Dept of Natural Resources*, 182 Wn.2d 242, 267, 343 P.3d 342 (2014) (Wiggins, J., dissenting) (citing cases), in which a five-member majority overruled the line of cases that were the primary issue in the original appeal, which was whether RCW 4.12.010 is a jurisdictional or venue statute. Prior to this Court’s decision in *Ralph* a long line of cases in Washington continually affirmed that RCW 4.12.010 governs jurisdiction affecting local actions and that local actions commenced in the wrong county must be dismissed due to lack of jurisdiction. In *Ralph* the Court overruled prior case authority concluding that that RCW 4.12.010(1) prescribes only venue, not jurisdiction. *Ralph* at 259. This prior Washington case authority was the reason Porter commenced his action in Pierce County Superior Court and was the primary legal issue at the Court of Appeals.

The *Ralph* decision resolved the issue of whether filing in any Superior Court invokes the jurisdiction of the Superior Court.

In *Young*, we explained that article IV, section 6 prevents the legislature from limiting subject matter jurisdiction “as among superior courts.” [*Young v. Clark*] 149 Wn.2d at 134. This is so because under article IV, section 6, “all superior courts ... have the same authority to adjudicate the same ‘types of controversies.’” *Dougherty v. Dep’t of Labor & Indus.*, 150 Wn.2d 310, 317, 76 P.3d 1183 (2003). In *Dougherty*, “[w]e reject[ed] the theory that subject matter jurisdiction of the superior court varies from county to county” since “[t]he ‘type of case’ is the same whether it is heard in Thurston County or some other county.” *Id.* And, we have since affirmed that “[w]here one state resident sues another in tort, the superior courts of Washington State have subject [*253] matter jurisdiction.” *Williams v. Leone & Keeble, Inc.*, 171 Wn.2d 726, 730, 254 P.3d 818 (2011). *Ralph* at 253 - 253

Probate jurisdiction and venue was also resolved specifically by the *Ralph* decision.

And, in probate matters, the legislature has given to “[t]he superior court of every county” jurisdiction, *RCW 11.96A.040(1)*, to resolve “[a]ll matters concerning the estates and assets of incapacitated, missing, and deceased persons,” *RCW 11.96A.020(1)(a)*, and states venue is proper in “any county the petitioner selects,” *RCW 11.96A.050(4)*. *Ralph* at 256.

There is no reason to further debate the issue of whether filing in a Superior court invokes the jurisdiction of the Superior Courts. Therefore the basis of the Kittitas County Superior Court’s orders that were at issue in the Court of Appeals – that Porter’s filing in Pierce County Superior Court did not invoke Superior Court jurisdiction because that was Pierce

County Superior Court was not a “proper court” – can no longer be debated based on *Ralph*.

Under the *Ralph* analysis no statutory language including TEDRA statutory language, should be read as restricting the jurisdictional authority of the Superior Courts. Therefore, Porter properly and timely filed his action against the Estate of Boissio in the Pierce County Superior Court within any applicable statutory limitation periods including the nonclaim statute RCW 11.40.100(1).

B. Summary of Case

The gravamen of Porter’s appeals are his claims against the Estate of Charles Boisso arising from a 1999 agreement between Porter and the decedent, Charles Bossio (“Boisso”) for the purchase of real property located in Pierce County, Washington. Porter entered into a real estate contract agreement with Boisso in August 1999 to purchase two - one-and-one-half-acre - parcels of real property located at 14519 - 245th Street East, Kapowsin, Pierce County, Washington, known as Pierce County tax parcels number 0418245006 and 0418245008 (“Pierce County Properties”). Porter paid \$2,000 down and over the years made payments to Boisso of over \$116,000 on this contract in addition to making substantial improvements to the Pierce County Properties.

Following Boisso’s death in 2012 and the commencement of the

Probate Case in November 2012, Porter recorded a Notice of Claim of Interest against the Pierce County Properties in the Pierce County records and also filed a Creditor's Claim in the Probate Case requesting that the Estate acknowledge Porter's claim of interests in the Pierce County Properties and agree to deliver a deed to Porter upon the pay off the real estate contract. The Estate rejected Porter's claims by Notice of Rejection dated December 31, 2012 and Porter commenced the Pierce County Case against the Estate on January 29, 2013 disputing the rejection of his claims against the Estate and requesting specific enforcement of his real estate contract, declaration of his rights, title and interest in the Pierce County Properties and alternatively the equitable claim against the Estate for unjust enrichment.

Porter filed his complaint against the Estate in Pierce County Superior Court because of the jurisdictional requirement of RCW 4.12.010(1), which, prior to this Court's decision in *Ralph*, required all actions involving claims for the determination of any questions affecting the title to real property be commenced in the county where the property is located.

After service of the Porter's complaint on the Estate, the Estate appeared in the Pierce County Case and moved to dismiss the action pursuant to CR 12(b) claiming Porter's claims were governed by

Washington's Trust and Estate Dispute Resolution Act, Chapter 11.96A RCW ("TEDRA") and that his claims for specific performance and declaration of his rights in the Estate's Pierce County property were transitory. The PR's attorney argued that RCW 11.96A.050(5) was a strict venue statute that trumped the requirements RCW 4.12.010(1) and argued that Pierce County was an improper venue, Pierce County Superior Court lacked jurisdiction and Porter's complaint must be dismissed.

Pierce County Judge Tollefson denied the Estate's motion, stayed the Pierce County action and directed Porter to litigate his claims to the Pierce County Properties in the Probate Case in Kittitas County. In response to Judge Tollefson's order, Porter brought a motion to change venue which Judge Tollefson granted on April 28, 2013, ordering the Pierce County case transferred to Kittitas County. The Pierce County Case was subsequently transferred to Kittitas County pursuant to the Order to Transfer Venue and given Kittitas County Superior Court causes No. 13-2-00169-4.

While the process of transferring the Pierce County Case to Kittitas County was proceeding, the Estate filed a Petition in the Probate Case seeking an Order Clearing Title to the Pierce County Property based on the same arguments presented to Judge Tollefson in the Pierce County Case and further argument that Porter's claims are forever barred because

Porter failed to file his complaint in Kittitas County Superior Court within 30 days after the date of the Estate's rejection notice. Porter answered the Estate's Petition arguing his claims were against the Estate, not the decedent, and therefore the nonclaim statute, RCW 11.40.100, did not apply, and if the nonclaim statute applies, Porter's commencement of the Pierce County Case within the 30 day filing period of RCW 11.40.100(1) tolled the statutory limitation period. Kittitas County Superior Court Judge Chmelewski rejected Porter's arguments and entered an Order Clearing Title on May 28, 2013 granting the Personal Representatives Petition Clearing Title, ruling that Porter failed to commence his action against the Estate in the proper court within the 30 day limitation period of RCW 11.40.100(1) and therefore his claims to any right, title and interest in the Pierce County Properties were forever barred. ("Order Clearing Title").

The Order Clearing Title held that all of Porter's claims stated in his Creditor's Claim and in his Answer to the Estate's Petition for Order Clearing Title were forever barred and further declaring that Porter had no claim, right or interest in the Pierce County Properties because Porter did not file his suit in Kittitas County within 30 days after the date of the Rejection Notice. However the Order Clearing Title did not address or dismiss Porter's claims for Unjust Enrichment. Porter's motion for

Reconsideration was denied by letter dated June 19, 2013 and on July 3, 2013 Judge Chmelewski entered an Order awarding the Estate attorney fees in the amount of \$29,650 and costs of \$92.00. On the same day, Judge Chmelewski entered the Order of Dismissal in the Pierce County Case. Porter timely appealed all of Judge Chmelewski's orders and judgments entered in the Probate Case and the Pierce County Case.

Porter appealed these orders and judgments because: (1) Porter properly commenced his action against the Estate in Pierce County under RCW 4.12.010(1); (2) Porter's actions are not claims against the decedent and therefore not subject to the nonclaim limitations of RCW 11.40.100(1); and (3) if Porter's claims are subject to RCW 11.40.100(1), Pierce County Superior Court was a proper court for the commencement of Porter's action against the Estate and his commencement of his action in Pierce County Superior Court within the 30 statutory limitation period tolled the nonclaim limitation period.

The Court of Appeals agreed with Porter and overturned the orders and vacated the judgments made by Kittitas County Superior Court Judge Chmelewski between May 28, 2013 and August 5, 2013.

II. ANALYSIS OF ISSUES PRESENTED FOR REVIEW

A. Considerations Governing Acceptance of Review RAP 13.4(b)

There are four factors that determine when a case will be accepted for review. RAP 13.4(b)(1)-(4). Factors (1) through (3) do not apply to this case. Therefore review can only be granted under RAP13.4(b)(4) which requires this Court to conclude the case involves “issues of substantial public interest that should be determined by the Supreme Court.” As a result of this Court’s decision in Ralph v. State Dep ‘t of Natural Resources, 182 Wn.2d 242, 267, 343 P.3d 342 (2014) (Wiggins, J., dissenting) (citing cases) there are no legal issues meeting the required substantial public interest requirement. It is clear from the Ralph decision that RCW 4.12.010 and TEDRA are not jurisdictional statutes. Therefore there is no public interest in accepting review.

B. No Basis for Review

The trial court’s decisions were based exclusively on her legal conclusion that filing an action under RCW 4.12.010(1) did not invoke the jurisdiction of the Superior Courts. Further the trial court’s decision was based on the legal conclusion that RCW 11.40.100(1) was an exclusive jurisdictional statute and therefore the only proper court for filing an action against Estate was in the county where the probate was started. This erroneous legal conclusion lead to her decide that Porter’s filing of his action in Pierce County Superior Court within the 30 nonclaim limitations period of RCW 11.40.100(1) failed to toll the 30 day non-claim

provisions and therefore Porter's claims were barred. The *Ralph* decision resolves the issue of whether filing in any Superior Court invokes the jurisdiction of the Superior Court.

In *Young*, we explained that article IV, section 6 prevents the legislature from limiting subject matter jurisdiction "as among superior courts." 149 Wn.2d at 134. This is so because under [***11] article IV, section 6, "all superior courts ... have the same authority to adjudicate the same 'types of controversies.'" *Dougherty v. Dep't of Labor & Indus.*, 150 Wn.2d 310, 317, 76 P.3d 1183 (2003). In *Dougherty*, "[w]e reject[ed] the theory that subject matter jurisdiction of the superior court varies from county to county" since "[t]he 'type of case' is the same whether it is heard in Thurston County or some other county." *Id.* And, we have since affirmed that "[w]here one state resident sues another in tort, the superior courts of Washington State have subject [*253] matter jurisdiction." *Williams v. Leone & Keeble, Inc.*, 171 Wn.2d 726, 730, 254 P.3d 818 (2011). *Ralph* at 253 - 253

There is no reason to further debate the issue of whether filing in a Superior court invokes the jurisdiction of the Superior Courts. Therefore the basis of the Kittitas County Superior Court's orders in the present case was a clear error of law because TEDRA statutory language should not be read as jurisdictional under the analysis in *Ralph*. Porter properly and timely filed his action against the Estate of Boisso in Pierce County Superior Court within any applicable statutory limitation periods including the nonclaim statute RCW 11.40.100(1).

There are no sections of TEDRA that declare its provisions are intended to be restrictive of the general jurisdiction of the superior courts.

The title to RCW 11.96A.050(5) states specifically that it is a venue statute: "Venue in proceedings involving probate or trust matters." RCW 11.96A.050(7) states that: "(7) If venue is moved, an action taken before venue is changed is not invalid because of the venue." This subsection (7) confirms that the Order of the Pierce County Superior Court changing the venue of the Porter's Pierce County Case to Kittitas County is valid and enforceable and therefore Judge Chmelewski should not have dismissed Porter's claims based on a failure to file his action in Kittitas County within the 30 days statutory limitation period.

Other sections of TEDRA confirm that the Act is not intended to limit the jurisdiction between the Washington superior courts. RCW 11.96A.040 is titled "Original jurisdiction in probate and trust matters -- Powers of court" and states in part that the "...superior court of every county has original subject matter jurisdiction over the probate of wills and the administration of estates of incapacitated, missing, and deceased individuals in all instances...". This confirms that Pierce County had subject matter jurisdiction over Porter's claims and his filing in that county was a proper commencement of his suit against the Estate which tolled any statutory limitation periods as prescribed in RCW 4.16.170 and CR 3.

C. Porter's claims to the Pierce County Properties not barred by RCW 11.40.010 and RCW 11.40.100(1).

After Charles Boisso died and a probate of his estate was commenced in November 2012, Porter filed a Creditor Claim form with a copy of Notice of Claim of Interest asserting Porter's claim of interest in the title of the Pierce County Properties pursuant to his alleged real estate contract. Porter's claim form requests the personal representative confirm the remaining balance due the Estate under the contract and the Estate's agreement to execute a deed to Porter upon payment of this remaining balance. In this circumstance, the creditor claim provisions in RCW 11.40 do not apply to Porter's claims to the Pierce County Properties. *Witt v. Young*, 168 Wn. App. 211, 218, 275 P.3d 1218 (2012); citing *Smith v. McLaren*, 58 Wn.2d 907, 909, 365 P.2d 331 (1961); *Olsen v. Roberts*, 42 Wn.2d 862, 865-66, 259 P.2d 418 (1953).

The *Witt* case and the authorities cited therein make it clear a person claiming an interest in the real property of the estate is not subject to the filing limitation periods that apply to creditor's claims under RCW 11.40.010 and RCW 11.40.100(1). In *Witt*, a woman claiming to have been in an unmarried, committed, intimate relationship with the decedent, commenced an action against the Estate for partition of real and personal property. She filed a creditor's claim form stating the basis of her claim to

the real property. The estate rejected her claim and notified her she had to file an action within 30 days or be barred under RCW 11.40.100(1). She commenced an action against the estate after the 30 day period had passed and the estate moved for an order dismissing her action on summary based on RCW 11.40.100(1). The motion was denied by the trial court.

The Court of Appeals in *Witt* affirmed the trial court decision, holding that persons asserting claims to interests in property are not creditors of the estate and therefore the time limitations for filing actions under the creditor claim statutes RCW 11.40.010 and RCW 11.40.100(1) do not apply. The *Witt* court cited *Smith* at 909 *Olsen* at 865-66 as controlling authorities and summarized the legal precedent of these cases as follows:

Smith and *Olsen* both hold that a claim for property as a tenant in common is not a creditor's claim and that a complaint claiming rights in the property as a tenant in common is not an action by a creditor of the estate. The court noted that these were not claims that the estate was indebted to the parties seeking relief and that the actions merely sought to establish the parties' interests in specific property and to exclude that interest from the estates' inventories. *Smith*, 58 *Wn.2d* at 909; *Olsen*, 42 *Wn.2d* at 865-66. *Witt* at 218.

In *Olsen* the State Supreme court overturned a trial courts order dismissing a partition action against an Estate by an ex-spouse of the decedent because the claimant did not timely file a claim in the probate

proceeding within 6 months of the notice to creditors. The Supreme Court cited 3 *Bancroft's Probate Practice* (2d ed.) 512, 526, §§ 772, 778 which states:

“To constitute a claim against the estate of a deceased person, an obligation must consist of a debt incurred by or for the decedent during his lifetime. Where, on the other hand, the recovery of specific property is sought on the ground that such property is impressed with a trust for the benefit of the person claiming it, and the particular property is properly identified or traced, the matter is not one of claimed indebtedness but of an assertion that the particular property is no part of the general assets of the estate. No claim, therefore, need be presented in such case as a condition to action to recover the property or impress it with the trust.”

The Olsen court also cited 21 *Am. Jur.* 579, § 348, confirming the rule that “... presentation of a claim or demand has been held unnecessary in actions ...for the recovery of specific property.” *Olsen* at 866. In concluding its decision the *Olsen* court stated that an action claiming an interest in real property is not a claim for a debt and the claimant is not a creditor of the estate. *Olsen* at 866. Similarly, the *Smith* court, citing *Olsen*, held that filing of a creditor's claim is not a condition precedent to an action by a former spouse to recover his or her share of community property from the deceased spouse’s estate. *Smith*, 58 Wn.2d at 909.

The *Witt* line of cases clearly establish that Mr. Porter is not a “creditor” of the Estate in this proceeding and is not subject to the filing

limitations under RCW 11.40.010 and RCW 11.40.100(1). If Porter is not a creditor under RCW 11.40 then he is not barred from maintaining an action on his claims against the title to the Pierce County property, regardless of whether his suit was commenced within the 30 day limitation period of RCW 11.40.100(1).

D. Commencement of Action in Pierce County Tolloed Statutory Limitation Period.

There is no dispute that Porter filed his suit against the Estate in Pierce County Superior Court on January 29, 2013, asserting his claims to right, title and interest in the Pierce County Properties. Following the filing and service of the Complaint, the Estate of Charles Boisso entered an appearance and filed a Motion to Dismiss the Complaint on the basis that the Complaint should have been filed in Kittitas County Superior Court. The Estate's Motion was denied by the Pierce County Superior Court, and the Court entered an Order staying the Pierce County action on April 12, 2013. Following entry of the Order Staying Proceedings, Porter brought a Motion to Transfer Venue of the case to Kittitas County Superior Court, which Motion was granted on May 3, 2013. Following the entry of the Order Transferring Venue the Pierce County clerk transferred the case to Kittitas County Superior Court.

Under the *Washington Constitution Article IV, § 6*, the superior

courts are courts of general jurisdiction with the authority to hear and decide cases in equity and all cases at law for which jurisdiction has not been vested exclusively in some other court. A superior court obtains jurisdiction upon service of summons and complaint on the defendant or earlier filing of the complaint with the court. CR 3 and RCW 4.28.020.

“From the time of commencement of the action by service of summons, or by the filing of the complaint, or as otherwise provided, the court is deemed to have acquired jurisdiction and do and have control of all subsequent proceedings.” RCW 4.28.020. See also *Seattle Seahawks, Inc. v. King County*, 128 Wn.2d 915, 917, 913 P.2d 375 (1976).

The Superior Court Civil Rules confirm the provisions of RCW 4.28.020 stating:

“:...a civil action is commenced by service of a copy of a summons together with a copy of the complaint,...,or by filing a complaint....” CR 3.

Porter’s filing of his Summons and Complaint in the Pierce County Superior Court and service of that Summons and Complaint on the estate were all accomplished within 30 days after rejection of his claim by the estate. Therefore, any limitation period established for filing claims against the Estate, including RCW 11.40.100, were tolled under RCW 4.16.170 by Porter’s proper filing of his Summons and Complaint in the Pierce County Superior Court on January 29, 2013. Washington’s tolling statute, RCW 4.16.170, states:

“...for the purpose of tolling any statute of limitations, actions shall be deemed commenced when the complaint is filed or the summons is served, whichever occurs first...”

This tolling statute specifically states it applies to “any statute of limitations” and therefore includes RCW 11.40.100. Porter’s commencement of his suit in Pierce County Superior Court tolled any statute of limitations applicable to his creditor claim. Therefore, to the extent RCW 11.40.100(1) applies to any of Porter’s claims, the limitation period was tolled upon his filing in Pierce County Superior Court. Judge Chmelewski’s ruling that Porter’s claims are time barred under RCW 11.40.100(1) is contrary to Washington law and must be reversed.

An action properly commenced by filing and service establishes the subject matter and personal jurisdiction of the court. “A properly commenced action endows the superior court with subject matter jurisdiction.” *Russell v. Marenakos Logging Co.*, 61 Wn.2d 761, 766, 380 P2d 744 (1963).). Porter’s filing of his suit against the Estate was in a proper court and timely commenced and it was error of the Kittitas County Court to dismiss his claims because he did not first file in Kittitas County within the 30 day limitation period.

E. TEDRA is not a jurisdictional statute.

There is no provision in the TEDRA or in Chapter 40 of Title 11 that states a person making a claim against the Estate must bring the suit in the

court where the probate is pending. If the only court with jurisdiction was the probate court the statute would direct the claimant to file in the court where the probate is pending. Instead RCW 11.40.100(1) requires the Estate to notify claimant's whose claims are rejected by the Estate that they must bring their suit in the "proper court". Instead of specifying a rejected claimant must file his action in the superior court of the county where the probate is pending, RCW 11.96A.040, which is titled "Original jurisdiction in probate and trust matters -- Powers of court", states in part that the "...superior court of every county has original subject matter jurisdiction over the probate of wills and the administration of estates of incapacitated, missing, and deceased individuals in all instances...". This confirms that Pierce County had subject matter jurisdiction over Porter's claims and his filing in that county was a proper commencement of his suit against the Estate which tolled any statutory limitation periods as prescribed in RCW 4.16.170 and CR 3.

The title to RCW 11.96A.050 states specifically that it is a venue statute: "Venue in proceedings involving probate or trust matters." Subsection (7) of this statute states that: "(7) If venue is moved, an action taken before venue is changed is not invalid because of the venue." RCW 11.96A.050(7). This subsection confirms that the Order of the Pierce County Superior Court changing the venue of the Porter's Pierce County

Case to Kittitas County is valid and enforceable and therefore Judge Chmelewski should not have dismissed Porter's claims based on a failure to file his action in Kittitas County within the 30 days statutory limitation period.

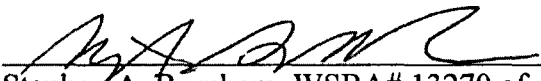
In this context the "proper court" is a court with jurisdiction over the persons and subject matter of the suit, which can include courts other than the superior court in the county where the probate is pending. If this was intended to create exclusive jurisdiction in one superior court over another, the statute would have specified the claimant had to file in the county where the probate is pending. The Estate's attorney has not cited one case that states TEDRA creates exclusive subject matter jurisdiction of all claims against the Estate. Clearly TEDRA does not restrict the general subject matter jurisdiction of the superior courts established under Article IV, Section 6 of the Washington State Constitution. *Ralph* at 254 citing *Shoop v. Kittitas County*, 149 Wn.2d 29, 65 P.3d 1194 (2003); *Young v. Clark*, 149 Wn.2d 130, 65 P.3d 1192 (2003).

III. CONCLUSION

The Appellant, Kevin Porter respectfully requests that this Court deny review because the Estate of Boisso has not shown a basis for review under RAP13.4(b)(4) which allows review only if the case involves "issues of substantial public interest that should be determined by the

Supreme Court.” As a result of this Court’s decision in Ralph v. State Dept of Natural Resources, 182 Wn.2d 242, 343 P.3d 342 (2014) (Wiggins, J., dissenting) (citing cases) there are no legal issues meeting the required substantial public interest requirement.

DATED this 28th day of September, 2015.



Stephen A. Burnham, WSBA# 13270 of
Campbell, Dille, Barnett & Smith, P.L.L.C.
Attorneys for Kevin Porter

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SUPREME COURT OF THE STATE OF WASHINGTON

NATHANIEL (NATE) BOISSO,)	
PERSONAL REPRESENTATIVE)	Case No. 91959-3
OF THE ESTATE OF CHARLES)	
BOISSO,)	
Petitioner,)	PROOF OF SERVICE
v.)	
)	
KEVIN PORTER)	
)	
Respondent.)	

Under penalty of perjury under the laws of the State of Washington, it is hereby certified that the undersigned on September 28, 2015, delivered electronically a true copy of Respondent's Motion to Extend with Respondent's Answer to Petition attached thereto to the following parties:

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604 North Main Street
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DATED this 28th day of September, 2015, at Puyallup, Washington.


Printed Name: Vicki Henke

OFFICE RECEPTIONIST, CLERK

From: OFFICE RECEPTIONIST, CLERK
Sent: Monday, September 28, 2015 3:47 PM
To: 'Steve Burnham'
Cc: Vicki Henke
Subject: RE: Answer to Petition with Motion to Extend time to File Answer - Case No. 91959-3

Rec'd 9/28/2015

Supreme Court Clerk's Office

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.

From: Steve Burnham [mailto:steveb@cdb-law.com]
Sent: Monday, September 28, 2015 3:32 PM
To: OFFICE RECEPTIONIST, CLERK <SUPREME@COURTS.WA.GOV>
Cc: Vicki Henke <VHenke@cdb-law.com>
Subject: Answer to Petition with Motion to Extend time to File Answer - Case No. 91959-3

Attention Clerk of the Court:

Re: CASE NO. 91959-3
PETITIONER: NATHANIEL (NATE) BOISSO, PERSONAL REPRESENTATIVE OF THE ESTATE OF CHARLES BOISSO v.
RESPONDENT: KEVIN PORTER

Attached to this email is the motion to extend time for filing the Answer with Answer of the Respondent to Petition for Review attached thereto. If you have questions please contact me.

Also attached is a certificate of Service.

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