

COMES NOW Respondent Quality Loan Service Corp. of Washington (“Quality”) and objects to Appellants’ petition for review by the Supreme Court.

FACTS

Quality hereby incorporates the facts set forth in the opinion from Division I.

ARGUMENT

RAP 13.4 enumerates the grounds for accepting review. None the enumerated grounds exist in this case.

The Supreme Court’s subsequent decision in *Trujillo v. Nw Tr Servs*, ___ Wn2d ___, Slip Op No 90509-6 (August 20, 2015) has no impact on this case. The Supreme Court in *Trujillo* took issue with the form of the beneficiary declaration in question, which stated that Wells Fargo was the “actual holder” or “has requisite authority...to enforce [it]”. The Court held the trustee was not allowed to rely on the beneficiary declaration because of its ambiguous language.

The Supreme Court’s *Trujillo* reversal has no bearing on the present case. The beneficiary declaration given to Quality in the present case unequivocally states that Aurora is the “actual holder” of the promissory note. The statute expressly allows Quality to rely on the unequivocal beneficiary declaration in question, and nothing in the

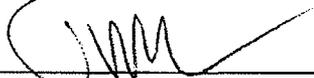
Trujillo decision changes that.

CONCLUSION

Trujillo is distinguishable, and Appellants have failed to demonstrate grounds for review, and the Court should deny review.

Dated: September 28, 2015

MCCARTHY & HOLTHUS, LLP



Joseph Ward McIntosh, WSBA #39470
Attorney for Quality Loan Service Corp. of Washington

CERTIFICATE OF MAILING

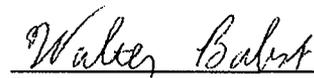
The undersigned declares under penalty of perjury under the laws of the state of Washington that the following is true and correct. On September 28, 2015, I arranged for service of the forgoing Answer to Petition for Review on the following parties via overnight mail:

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SIGNED this 28 day of September, 2015, at Seattle, Washington.



Walter Babst
Legal Assistant

OFFICE RECEPTIONIST, CLERK

To: Walter Babst
Cc: IDSMH; Joseph McIntosh
Subject: RE: Case No. 72506-8-I | WA-15-664618-APP

Received on 09-28-2015

Supreme Court Clerk's Office

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From: Walter Babst [mailto:wabast@McCarthyHolthus.com]
Sent: Monday, September 28, 2015 2:35 PM
To: OFFICE RECEPTIONIST, CLERK <SUPREME@COURTS.WA.GOV>
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Subject: Case No. 72506-8-I | WA-15-664618-APP

Good afternoon

Please find attached Answer to Petition for Review for Court of Appeals Case No. 72506-8-I. Please file Answer to Petition for Review. If you have any questions please contact me.

Thank you

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Should escalation be required, please contact the following individual
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