

92863-1  
No. 922985

THE SUPREME COURT OF WASHINGTON  
Court of Appeals, Division III, Case Number: 32597-1-III

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DEBRA CLAWSON,

Respondent

v.

WILLIAM MARX,

Appellant

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APPELLANT'S ANSWER TO PETITION FOR REVIEW

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JULIE C. WATTS/WSBA #43729  
Attorney for Appellant  
THE LAW OFFICE OF JULIE C. WATTS, PLLC  
505 W. Riverside Ave., Suite 200  
Spokane, WA 99201  
(509) 703-4725

 ORIGINAL

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## I. ARGUMENT

The Rules of Appellate Procedure state that a petition for review will be accepted by the Supreme Court *only* if it complies with one of the four subsections of RAP 13.4(b). Ms. Clawson does not reference RAP 13.4 or cite any authority to support her request for review by this Court, nor does her argument substantively meet any of the four criteria set forth in RAP 13.4.

**a. Pursuant to RAP 13.4(b), there is no basis to review the Court of Appeals' decision reversing the trial court's ruling.**

The appellate court's decision does not conflict with a decision of the Supreme Court pursuant to RAP 13.4(b)(1), nor does Ms. Clawson argue that it does.

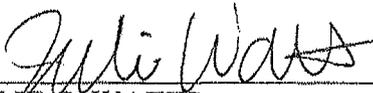
The appellate court's decision does not conflict with another decision of the Court of Appeal pursuant to RAP 13.4(b)(2), nor does Ms. Clawson argue that it does.

The appellate court's decision does not raise any significant question of law under the Constitution of the State of Washington or of the United States pursuant to RAP 13.4(b)(3), nor does Ms. Clawson argue that it does. The issues involved are well-settled under both state and federal law.

The appellate court's decision does not involve an issue of substantial public interest that should be determined by the Supreme Court, and further, review of a decision of the Court of Appeals is rarely accepted on the basis of public interest unless it has "sweeping implications" that affect members of the public beyond the litigants involved in the case. See, e.g., State v. Watson, 155 Wn.2d 574, 122 P.3d 903 (2005). It is worth noting that the decision of the Court of Appeals for which Ms. Clawson seeks review is unpublished and has no precedential value that would affect judicial decisions that may follow;

**CERTIFICATE OF ATTORNEY**

I certify that I arranged for hand-delivery of a copy of the foregoing APPELLANT'S ANSWER TO PETITION FOR REVIEW to MATTHEW DUDLEY, at 104 S. Freya, Suite 120A, White Flag Building, Spokane, WA 99202, on March 10, 2016.

  
\_\_\_\_\_  
JULIE C. WATTS  
Attorney for Appellant

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Re: Clawson v. Marx, Court of Appeals, Division III, Case # 32597-1-III

Filed by: Attorney Julie C. Watts, 509-703-4725, WSBA No. 43729, [julie@watts-at-law.com](mailto:julie@watts-at-law.com)

Attached please find the **APPELLANT'S ANSWER TO PETITION FOR REVIEW** in the above named case.

Gary Watts, Office Manager  
The Law Office of Julie C. Watts, PLLC  
505 W. Riverside Ave., Suite 400  
Spokane, WA 99201  
T: (509) 703-4725  
F: (509) 747-5692

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The Law Office of Julie C. Watts, PLLC  
505 W. Riverside Ave., Suite 200  
Spokane, WA 99201  
T: (509) 703-4725  
F: (509) 473-9421

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