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No 730321-1-I

COURT OF APPEALS DIVISION 1
OF THE STATE OF WASHINGTON

ELSADIG AHMED,

Appellant

V

GLACIER FISH COMPANY, LLC

Respondent

On Appeal from the Superior Court of the State of Washington

For King County

No 13-2-23510-2 SEA

Reply Brief OF Appellant

ELSADIG AHMED

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DIVISION ONE

DEC 30 2015

My is Elsadig Ahmed I am United State Citizen I have 2 small Kids. I started work with **GLACIER FISH Company from 2-2010 to 10-2012** .I Got two Injury first frostbites on my hands and my feet second is carpal tunnel pain and numbness I did surgery in my right hand but still I still have frostbite problem and carpal tunnel pain and numbness. But after surgery I came back for my job on June 17-2013 but the company (**Renee Sage**) Refused to gave me my job.she said gave me 20,000 ,and she said the reason is my medical (Doctors).

Report said my Injury in June 22 by 2:00 PM and that time shift for **Joe** (Forman) and **Jeff** they starting from 8:00 AM to 8: PM and that time **Jeff** written my injury .Now he change the Report said June 23 ,2010 at 03:45 AM was not True because that time was sleeping and he said to(**Joe**). Elsadig not go back to freezer already that time Joe sleeping too .And that time end of my shift .4:AM I said Jeff **did not told the truth** .Looking for this paper everything is changed and my report is changed too I need the original papers for all reports .looking for exhibit 14 page 8 all the Date written by order from July 14 to end the paper 7-21-2010 do you see my name (Elsadig Ahmed)where is my report for 7-16-2010 why not written with those people?

I said He changed my reports .I said this is company looking for me different than all employee. I do not understand why?

For those reasons I need my original papers for all my report papers for June 22-2010 the report written Jeff the report 7-16-2010 before I go to the clinic and after I came from the clinic.

Allays I am talking about my witnesses .looking all those people had chosen to be my witnesses and this signature for my lawyer Report Anderson

1-Diallo Abdul

2-Dioumassy Yatte

3-Kabba Musa

4-Sow Mamadou

5-ALI Nizar

6-Medec Tom(freezer foreman)and that time I got my injury inside the freezer in June 22-2010 at 2:00 PM and I knew he is working from 8:AM to 8: PM .always I talking about my lawyer not doing good about my problems all those people my right witnesses and not brought them in the court. and I ask him why not brought them the court only he told me those people your own people (African) and same religion and all are immigrant,and

those still working with company the judge cannot accept them be witnesses .if say like that how about **Medec Tom(freezer foreman)** is not immigrant and not working with company this time .and I know U-S-A not do that ways.

My lawyer Report Anderson by himself told me had same cause with another person from Sudan the name is (Peter) and what happen is gave him the cause back. Because that person complain about he did for him .just like my cause .those all problem with same company GLACIER Fish Company .why all this is same lawyer **Report Anderson** I think I chose wrong lawyer working with GLACIER Fish Company this is **my lawyer Report Anderson** and help GLACIER Fish Company what he did wrong for the employees to winner the case what he did wrong and ask for me to pay him 19,000 dollars . listen to the **CD** records I did with **my lawyer Report Anderson** .**what** I said is True . He not brought my witnesses, my jury, what he said GLACIER Fish Company is good company why ...

I talking about translator 2-26-2014 in Tacoma my lawyer not brought translator to me I used translator for the GLACIER Fish Company lawyer that time I do not understand her is good and I had problem with translator and I get problem with the Doctor who did the

examinations for me and the Doctor in the trial told that too , about the translator problem and my lawyer sent with me nurse to recording the examinations and she did that and I ask my lawyer for the records examination I can listen to it if the Doctor or the nurse did something is not right because I do not understand them good. But my lawyer said no (did not gave me that record why?)

I saw many thing about my hand and my feet is not true and the Doctor never looking for my feet and never exams them why?

Looking for my reports injury I said fingertips and feet why not exam them?

Those my feet part of my body. Those never ask me how I get carpal tunnel. Why I did surgery in my right hand and did not do in my left hand? Now cause me a lot of pain in my left hand and right too.

Since I got frostbites the company never send me to the specialist Doctor for frostbites. Looking Deposition for Doctor Willem Berg said I am not Doctor for frostbites. How talking about frostbites. Doctor for Seattle hand Surgeon said lam Doing only Surgery not for frostbites Doctor ,U.S health work she not for frostbites. lam not believe Doctor did for me examination.

Why the company sent me to Especially Doctors for problem?

Just the Judge said the Company did for my frostbites good without Right Doctors (I talking About especially for frostbites I am having)the examination in Tacoma not specialist for frostbites How the judge said get Treatment for my frostbites Why the Judge not Listed (Renee Sage)as Witnesses for the Company in the list Witnesses for Trail ?

Renee Sage who said your all Doctors said no more to work in the boat by the Witnesses interpreter his name(Kamal) on June 17-2013 and that time said gave to me 20,000 and no more Job for you ?

I Said to her I come looking for my job she said to me this is job no more to do it Recoding to your Doctors but I said to her I can do Landry or fish mil or working in the kitchen but she said no jest take 20,000 and go home and I think Renee Sege or the company not gave me job .not for my medical bout for my racism because I can do some job in the company and many people get injury and still working in the company why looking for me like those people ?

Why I said for my racism?

Because it happened in 2010 looking Muslim employee different than another people in the boat and we did complain about that problems and we did meeting with captain and the factory manager about Racism and the office in Seattle know that and still continue .beside my problem I get the injury on June 22-2010 at 2:00 PM that time the clinic was open but Medic Refused me to see Doctor to get Treatment. For my frostbites .kept me working until July16, 2010 .for that Reason the company was keeping change the Reports and tried to say at that time the clinic is closed. for that change my Reports to June 23-2010 –at 3:45 AM looking for page 2 I said Jeff did not tell the Truth .because his shift started from 8:AM to 8:PM How to come did my Reports on June 23 at 3:45 AM

Joe –started his shift at 8:AM to 8:PM how to sent me to Jeff at June 23 at 3:45 AM and he was sleeping?

If reading my Deposition, Joe Deposition, Jeff Deposition, Yatte Deposition ,the report injury written by the **Keith C .pendleton Second mate (safety)**his report for my injury on June 22-2010 by 2:PM

Looking my first complain on June 22-2010 jest between Joe Forman and Jeff first thing I did I Told Joe I get hard in the freezer Joe said go to the Jeff(safety) I went to Jeff he gave me medicine and written my injury and he said

to me go back to work I went to Joe again and sent me to the duke .and all this happened by 2:00 PM on June 22-2010 . Joe and Jeff working between 8:AM TO 8:PM

For all those Deposition they can found my first report in June 22-2010 at 2:00 PM .Why Judge said June 23-2010 at 3:45 AM. I said the never read all those Depositions and the reports injury to fine the fact of what time the injury is happened?

He just was looking for fake papers and the conclusions of the company lawyer....

On (B)finding of fat number 10 about the foreman **Vercruysse** sent me back to the freezer .my witnesses **Yatte Dioumessey** said saw me inside the freezer after the injury the Judge said too general why? In the Deposition of **Yatte** I said all the lawyers did not ask him about those Questions IF ask him those Questions he can answered it all. Because he knew when started his shift and was end and when he saw me in the freezer.

But however he said saw me in the freezer and I had wrong gloves and had frostbites in my hands **Yatte** told the fact. And all my witnesses can told the fact. But my lawyer not brought them ...

The **Vercruysse** did not tell the fact.

Why always I talking about **my lawyer Robert Anderson** did not representing me will ?

Because He skip my Jury ,he did not brought my witnesses to the court such as Yatte He brought the interpreter for Yatte and did not show four days tail and he did not explain for me why not came ?

For all those reasons he likes **GLACIER FISH COMPANY, LLC**

To winner the case and he did that.

I said my lawyer was not Representing well in front of the court why? Because is in the trail **my lawyer Robert Anderson** shaking in front of **Judge** and He did not how to talked and the Judge said if do not talking a loud and clear I cannot give you any point. And that is happened clear in the Trail CD Records and if have video can see more clears. **Always another lawyer for GLACIER FISH COMPANY** helps him for instruction what he can say or what he looking for. Those happened in the Trail. but the translator in Trail I did not understand him well because He used different accent. Many words I did not understand well. And already I told my lawyer I Need Sudanese translator but I came to the Trail and I did not saw any Sudanese translator but my lawyer said ok.

See what happened in the Trail?

Looking for the Trail Records in front of the **Judge** with Translator and the lawyers. my lawyer push me to talk by myself and another lawyer Glair Company needed to talked by Translator . I became Victim for the Trail I did not understand English well and the Translator too.

If I ask How many hours for the Trail? The Trail is 16 hours that mean 4 days Trail .if ask me how many hours I get from 16 hours Trail.

My answer is only about one hour. The **Judge** and **lawyers** did not **translate** for me well .from 16 hours I got only about one Translation that is not Right for my Trail. I looking for the Justice for my Trail I can get my health, my jobs back, I looking for fair Justice.

I want the Judge listen all my Recorders CD **comfrsition** I did **with my lawyer Report Anderson** and the for Glair fish company Lawyer name **lousis A. shields** they did not need To Appeals my

Cause again. Because they know my facts.

The fact is not good for them because trying to threaten me if I make Appeals they will send bill for me. Jest like my lawyer **Robert Anderson** 19,000 and **Glacier Fish Company** about 5,000 and all that is truth looking for the CD Records I did.

I saying The United State have Justice they can doing for everybody.

Why I said like that? If looking for the Records I did with my lawyer **Robert Anderson** end the CD number (?) can listen what happened to the Immigrant (Robert Anderson said that) and the **Judge** listed for in Immigrant Refugee that sentence I do not like it since I got my Citizen no body said Refugee. People said Citizen in the findings of fact numbers 15 said Glair paid Ahmed 76, 267, 96 for his work in 2012 He has not work in the fishing industry since. His saying is general. I am working hard for my family and myself no any person in Glair company work in the factory reach that 76,000 a year the Reason only got injury with them Skip me for my job. And I said no Rule saying that for the conclusions of law number 6 is not truth looking for deposition for **Yatte**.

For all those fact I wrote it in My Reply Brief. because my lawyer hid everything for my case now is clear what He did .I still looking my Justice. Because my lawyer skip my Jury without Reason .I did not got Right Translator for my Trail because I did not understand him well. Looking for CD Record Trail can see that. My Trail is 16 hours but I got only one hour that is did not Right for my Trail. I did not quit from my job but the company did like gave me job the reason said only I got Injury. I did not got Right

Translator for my Exam in Tacoma the Doctor too said that .and did not exam my feet. I still have frostbite, carpal tunnel pain and numbness .

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A handwritten signature in black ink, appearing to be the initials 'NS' followed by a horizontal line.A handwritten signature in black ink, consisting of several overlapping loops and a final flourish.