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No. 93422-3

### SUPREME COURT OF THE STATE OF WASHINGTON

JACK GRANT,

Plaintiff-Appellant

٧.

#### FIRST HORIZON HOME LOANS, et al.,

Defendant-Respondent

ON APPEAL FROM DIVISION I OF THE COURT OF APPEALS (NO. 72905-5-I)
ON APPEAL FROM WHATCOM COUNTY SUPERIOR COURT (NO. 10-2-02676-9)

# RESPONDENT QUALITY LOAN SERVICE CORP. OF WASHINGTON'S ANSWER TO APPELLANT'S PETITION FOR REVIEW

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WA-15-664704-APP



#### **ANSWER**

COMES NOW Respondent Quality Loan Service Corp. of Washington ("Quality") joins the answer filed by co-respondent First Horizon Home Loans in opposing the petition. As argued by Quality on appeal, the un-rebutted record before the trial court demonstrated that the foreclosure was advanced pursuant to the law in all respects. Appellant's petition focuses on everything except the actual facts from the case, which are fatal to his "wrongful foreclosure" claims. The petition should be denied.

Dated: August 16, 2016

MCCARTHY & HOLTHUS, LLP

Joseph Ward McIntosh, WSBA # 39470

Attorney for Quality Loan Service Corporation 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 August 19, 2016, I arranged for service of the forgoing RESPONDENT QUALITY LOAN SERVICE CORP. OF WASHINGTON'S ANSWER TO APPELLANT'S PETITION FOR REVIEW on the following parties via U.S. 1<sup>st</sup> Class Mail and email:

Joshua Bruce Trumbull Emily Anne Harris JBT & Associates, P.S. 106 East Gilman Avenue Arlington, WA 98223 emily@jbtlegal.com josh@jbtlegal.com

Andrew G. Yates Lane Powell, PC 1420 Fifth Avenue, Suite 4200 P.O. Box 91302 Seattle, WA 98111 yatesa@lanepowell.com

**SIGNED** this  $\frac{14}{9}$  day of August, 2016, at Seattle, Washington.

12 Balow

Walter Babst Legal Assistant

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#### Good afternoon

Please find attached Answer to Petition for Review for Court of Appeals Case No. 93422-3. Please file Answer to Petition for Review. If you have any questions please contact me.

#### Thank you

Walter Babst | Assistant to Joseph McIntosh, Esq.

McCarthy ♦ Holthus LLP

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\*\*\*Should escalation be required, please contact the following individual\*\*\*
Joseph McIntosh at (206) 319-9049 or <a href="mailto:imminuosemble.carthyholthus.com">imminuosemble.carthyholthus.com</a>