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NOV 28 2016

WASHINGTON STATE
SUPREME COURT

SUPREME COURT OF THE STATE OF WASHINGTON

Hatsuyo Harbord Petitioner/PLA

Supreme Court No: 93529-7

Appeals Court No:

✓
Safeway Inc. Respondent/DEF

Trial Court No: 13-2-21008-8 SEA

US District Court No: 13-CV-01127-JCC

Due 11/28/2016

Undelivered documents to Reply ordered
by Supreme Court of the State of Washington

Pro se/Immigrant/Petitioner, Hatsuyo Harbord files with Respondent/Safeway Inc./Daniel Hurley's undelivered documents to Reply ordered by Supreme Court of the State of Washington.

I. Issues at Supreme Court

(1) Petitioner filed motion to "change to Appeal" from "Discretionary Review." RAP 2.5(a)(c)

Respondent/Daniel Hurley and Supreme Court did Not respond this motion.

(2) Petitioner filed "Extension of Time" ^① for Three (3) months due to current medical problems, ^② for missing/tampering court documents from US District Court

case # 2:13-CV-01127-JCC, King County Superior Court Two separated Cases

case # 13-2-21008-8 SEA and case # 14-2-26220-5 SEA to investigate from

Supreme Court and Petitioner herself, and ② Extension of Time to ^{finish}

The Court ignored "what Petitioner was talking?" or "The Court does not understand my English as Immigrant?"

(3) Supreme Court Clerk (Ms. Fay) REFUSED to print event lists for two separated cases until November 22, 2016 from beginning of two separated cases.

On November 22, 2016, The Clerk printed only "event summary" due to "Public information."

Petitioner files with "hand files." Petitioner does not file with "E-file."

Supreme Court discriminated against Petitioner who files with "hand file"

Petitioner questioned the Clerk that "I am a petitioner who has two separated cases and why Petitioner can have an event lists for two separated cases?"

Supreme Court discriminated against Petitioner's rights to know what is going on Petitioner's cases.

* Petitioner's event lists was under secret from Petitioner until November 22, 2016. (Violation against Petitioner's Rights)

(4) Supreme Court Clerk REFUSED to give Petitioner for a copy of the cases which Petitioner asked in multiple times. Only printed portion of Petitioner asked.

Petitioner did NOT have a copy of Cases which Petitioner asked as of

November 28, 2016 (due date to submit Petitioner's Reply for this case.

(5) For these above reasons: Supreme Court REFUSED Petitioner to file Petitioner's document on Time, (discrimination/Violation against Petitioner's Rights)

II Issues at Appeals Court Div [I] in Seattle.

(1) Petitioner's spouse became "ill." Emergency room → stayed hospital → stayed skilled nursing home → home → Surgery → stayed hospital → home → Emergency room → stayed hospital → home → Surgery → stayed hospital → home → therapies.

During these incidents, Petitioner's spouse had many doctors' appointments.

(2) Petitioner and Petitioner's spouse had:

Automobil accident → Emergency room → many doctors' appointments and therapies → 2nd Automobil accident → doctors' office → therapies.

(3) During the Petitioner's spouse illness, Appeals Court Div [I] case # 72731-1-1

(Trial Court No. 13-2-21008-8 SEA) due for Appellant's Brief, Petitioner filed

Appellant's preliminary Brief on time. Then Petitioner filed the document "Refiled

for Appellant's Brief due to One of Statutes allows that Both parties should

have equal opportunity to argue at the Court" on August, 2015.

(4) Appeals Court did Not respond any decision for "Motion to refile Appellant's Brief."

(5) Appeals Court Case manager (Ms. Lori) told Petitioner that "Do not file appellant's Brief" until Three Judge panel's decision.

(6) Appeals Court Three judges panel on January 2016. ordered Respondent/Safeway Inc.

/Daniel Hurley to Respondent's Brief without filing Petitioner's Appellant's Brief.

Appeals Court Three judges panel did NOT explain why Petitioner could not file

Appellant's Brief which Petitioner asked at Appeals Court Div [I] on August 2015.

* Three judges panel violated to answer why Petitioner could not file Appellant's

Brief. Three judges only allowed Appellant's preliminary Brief without ordering

to Petitioner or without answering Petitioner's motion to refile due to statute

allows Both parties to have equal opportunity to argue at the Court.

(7) Respondent/Safeway Inc./Daniel Hurley filed Respondent's Brief on due date

with 10 pages over limit. Appeals Court sent the letter that re-submit Respo-

ndent/Safeway Inc./Daniel Hurley to file within 10 days with Sanction.

* Appeals Court Div [I] and Appeals Court Administrator/clerk/Richard

Johnson respond Respondent/Daniel Hurley to Resubmit his respondents

Brief with Richard Johnson's letter. (The Court responded by Next day.)

* But When Petitioner filed the document "Motion to file for Appellant's Brief on August 2015" to Appeals Court, Respondent/Daniel Hurley and the Court did NOT respond for Petitioner's motion. The Court FAILED respond.

⑧ Respondent/Daniel Hurley FAILED to mail a copy of his Respondent's Brief to Petitioner. (Violation of Civil Court procedure against Petitioner)

* Appeals Court did Not Default Judgment against Respondent/Safeway Inc./Daniel Hurley due to FAILED to serve 2nd submission Respondent's Brief after original due date.

* Petitioner filed "Certificate Questioner" against Respondent/Daniel Hurley. Petitioner did not receive any explanation for "Proof of mailing" or any response. Mr. Daniel Hurley filed and claimed that many documents to ① US District Court case # 2:13-cv-001127-JCC, ② King County Superior Court (Case No. 13-2-21008-8 SEA, and ③ King County Superior Court (Case No. 14-2-26220-5 SEA) WITHOUT mailing many documents to Petitioner. Again, Petitioner asked the Courts and Respondent/Daniel Hurley to respond, to answer, but Respondent FAILED.

* Appeals Court Div [I] FAILED to answer from Respondent/Daniel Hurley.

(9) Appeals Court FAILED to strike Respondent/Daniel Hurley's Respondent's Brief. Commissioner Mary Neels and Court Administrator Richard Johnson

(10) Appeals Court Div [I] did Not change the case record when Petitioner filed "Clerical Mistakes" and "Neglect" for Respondent/Daniel Hurley's Respondent's Brief.

(11) Appeals Court Div [I] did Not strike Respondent/Daniel Hurley's Brief. Commissioner Mary Neels and Administrator clerk/Richard Johnson filed this case event list as "strike", yet Commissioner Mary Neels and Administrator/Richard Johnson ALLOWED Respondent/Daniel Hurley's Brief in this case.

(12) Petitioner Filed Appeals Court Div [I] that "Why Respondent/Daniel Hurley's Brief even did not mail to Petitioner?" and "Why Petitioner's Appellant's Brief was Not allowed to enter this case?"

Three Judges Panel did not order specific about "Appellant's Brief."

Later Appeals Court Div [I] claimed that Petitioner did not file "Appellant's Brief"

This is Not True. The Court case manager told me that "do not file Appellant's Brief until Three Judge panel's decision." on August 2015.

Petitioner believed what Appeals Court case manager said.

Later Petitioner found that Appeals Court case manager mislead Petitioner.

Appeals Court Div [I] did Not allow Petitioner to file Appellant's Brief.

Appeals Court Div [I] allowed Only "Petitioner's Appellant's preliminary Brief."

(13) Commissioner Mary Neels and Court Administrator/Clerk Richard Johnson order to file Appellant's Reply without 2nd submission Respondent's Brief which Respondent/Daniel Hurley did not mail his Brief to Petitioner.

Petitioner filed "Undelivery Respondent's Brief to Reply" to Appeals Court Div [I] on first due date, on time.

(14) Commissioner Mary Neels and Court Administrator/Clerk Richard Johnson changed due date to file Appellant's Reply without Respondent/Safeway Inc./Daniel Hurley's "Respondent's Brief" again.

(15) Petitioner filed "2nd undelivery Respondent's Brief to Reply" to Appeals Court Div [I] on Second due date on time.

(16) Petitioner filed the document "Why Respondent's Second (2nd) submission

Respondent's Brief (after original due date without mailing a copy of his Brief to Petitioner) allowed by the Court?"

And "Why Petitioner's Appellant's Brief was Not allowed by the Court?"

And "Why Three Judges Panel allowed Only Appellant's preliminary Brief without attaching evidence?"

* Appeals Court did Not respond any of answers to Petitioner.

* Appeals Court intentionally avoid Appellant to file Appellant's Brief with evidence.

* Appeals Court allowed Respondent/Safeway Inc./Daniel Hurley's

"Respondent's Brief" without mailing a copy of his Brief to Petitioner

* Petitioner filed the Court to see Original Proof of mailing to Respondent

/Daniel Hurley. The Court and Respondent did Not show Original

Proof of mailing. Respondent/Daniel Hurley filed and claimed many

documents to U S District Court case No. 2-13-CV-01127-JCC,

King County Superior Court case No. 13-2-21008-8 SEA and King

County Superior Court case No. 14-2-26220-5 SEA, except

Respondent/Daniel Hurley did Not mail a copy of his documents to Petitioner. Petitioner filed these three cases to see original Proof of mailings from Respondent/Daniel Hurley. He Refused to show any of his mailing to Petitioner.

* Why Respondent/Daniel Hurley have Superior position?

* Why the attorney has priviledge to Not show the proof of mailing?

* Some of attorneys are abusing the Court Proceeding to Not show the proof of mailing, The Court allowed abusive attorneys' behavior.

* The Courts did Not respond to show original proof of mailing?

* Petitioner files by handed file, Petitioner did not file by E-file,

(17) Petitioner does Not have Rule 26(C)(2) (stipulated Protective Orders) in case No. 13-2-2/008-8 SEA.

(18) Petitioner filed "Motion to Strike" to Appeals Court Div [I].

Respondent/Daniel Hurley did not file "Opposition to Motion to Strike."

Appeals Court did not Strike Respondent/Daniel Hurley's Respondent's Brief.

Commissioner Mary Neels put on the record for "strik", but Commissione allowed Respondent/Daniel Hurley's Respondent's Brief even Respondent/

Daniel Hurley did not mail a copy of his Brief to Petitioner. ^{RAP/8.94/8.96}
^{RAP 2.5(a)(3)}

(19) Petitioner filed "Notice of filing Amicus Brief" and filed "Amicus Brief" to bring Petitioner's side of Facts to Appeals Court Div [I] due to denied Appellant's Brief. Appeals Court allowed only Appellant's preliminary Brief without attaching evidence. Appeals Court favored Safeway Inc. and Not allowed Petitioner to file Appellant's Brief RAP 2.5(a)(3)/RAP/8.9

* Appeals Court Div [I] DENIED Petitioner's Amicus Brief. Then allowed in this Petitioner's case, except Appeals Court Div [I] accept as Appellant's Reply. But Amicus Brief is useless without oral argument hearing. Appeals Court DENIED Petitioner's Amicus Brief without hearing. (Discriminated against Petitioner) Petitioner was DENIED to bring Petitioner's evidence to file Appellant's Brief, and ⁽²⁾ Petitioner was DENIED to bring Petitioner's evidence to file as Appellant's side of evidence and Facts (Amicus Brief) by the Court.

Appeals Court Div [I] allowed only Respondent's Brief in this case.

(20) Then Appeals Court ordered as frivolous claim against Petitioner.

* Appeals Court allowed only Appellant's preliminary Brief without

attaching evidence

* Appeals Court Div [I] DENIED Petitioner to file Appellant's Brief.

Appeals Court case manager (Ms. Lori) told Petitioner to Not file Appellant's Brief until Three Judges Panel. She misled Petitioner. Petitioner believed her what she said. It was intentional. RAP 18.9 / RAP 2.5(a)(3)

* Appeals Court Div [I] DENIED oral argument hearing.

Then, Amicus Brief is useless without oral argument hearing.

* Appeals Court Div [I] DENIED "Amicus Brief as Appellant's Brief"

Appeals Court Div [I] allowed "Amicus Brief as Appellant's Reply" which

Petitioner did Not have any chance to bring any Petitioner's side at all.

(21) Appeals Court DENIED all of Appellant's Rights to bring Appellant's side of this case at all. (discriminated against Pro se/Immigrant.
RAP 18.9 / RAP 2.5(a)(3)

(22) Appeals Court Div [I] only kept Respondent's Brief without any evidence from Petitioner. Respondent did Not mail a copy of his Brief to Petitioner.

This is absolutely irregular procedure.

This Appeals Court Div [I] judged only Respondent's document which

Respondent did Not mail a copy of his Brief.

(23) Then Appeals Court Div [I] ordered Petitioner to PAY for \$35,000

to Respondent/Safeway Inc./Daniel Hurley, who did Not mail a copy

of Respondent's Brief to Petitioner on time, RAP 18.9/RAP 18.9(a)

* Respondent's Brief should be DEFAULT JUDGMENT due to undelivery to Petitioner.

* Respondent's Brief should be strike, RAP 2.5(a)(3), 18.9, 18.9(a)

(24) Petitioner requested a certified Japanese Translator due to Language Barrier.

Appeals Court Div [I] DENIED a certified Japanese Translator during this

case. Petitioner is an immigrant and Proise.

(25) Petitioner filed "Motion to go back to King Co. Superior Court" to U S District

Court. U S District Court granted Petitioner to go back to King Co.

Superior Court due to misled U S District Judge by Respondent/Daniel

Hurley. Petitioner was granted under Rule 26(c)(2) (Stipulated

Protective Order).

(26) Frivolous Appeal (For purposes of statute authorizing award of attorney fees for bringing of Frivolous action, nothing respondent could say in her response on appeal could constitute a "Frivolous appeal.")

• Appeals Court Div [I] DENIED Petition to file Appellant's Brief.

• Only allowed Appellant's preliminary Brief without attaching the evidence.

• Appeals Court Div [I] DENIED Appellant's Amicus Brief as Petitioner's Brief.

- Appeals Court Div [I] DENIED oral argument hearing, so Petitioner could not bring the Petitioner's additional Facts as Amicus Brief at the hearing
- Appeals Court only allowed Appellant's reply against Respondent's Brief, so Amicus Brief is useless by the Court [No weight for Amicus Brief]
- Appeals Court Div [I] allowed Respondent's Brief without making a copy of Respondent's Brief to Petitioner. This is Frivolous Appeal and Fraud.
- Appeals Court Div [I] did not give sanction against "irregularly obtaining an order to file Respondent's Brief. RAP 18.9; RAP 2.5(a)(3), RAP 18.9(a)
- Petitioner filed "Bill of cost" at US District Court. Someone removed from the case event.
- Respondent/Daniel Hurley filed and claimed his documents which he did not mail a copy of documents.
- Appeals Court Div [I] awarded \$35,000 to Respondent's Brief was frivolous submission by the Court.
- Appeals Court Div [I] DENIED all of Appellant's Rights to file.
- Fundamental Rights.
- Fundamental Default by Appeals Court.
- Fundamental DEFECT by Appeals Court.

III Issues at King County Superior Court

(1) Judge Ken Shubert:

Judge Ken Shubert ordered to change for Trial date.

(2) Petitioner examined the case No. 13-2-2/008-8 SEA. Facts are someone rearranged this case lists (tampered & missing many documents)

Petitioner will show the evidence.

(3) Judge Kimberly Prochnau: At CR 16 conference, (Pre trial conference)

① Bailiff/Terry called Petitioner to be at Court room, without "Notice"

② Judge Prochnau handed signal to "Do not talk" to Petitioner during the conference so many times.

③ When Petitioner raised her hand to speak at the Court, Judge Prochnau totally ignored. Judge Prochnau and DEF/Safeway Inc./Daniel Hurley discussed without Petitioner.

④ This case No. 13-2-2/008-8 SEA was removed to U.S. District Court case No. 2:13-cv-01127-JCC by Respondent/Daniel Hurley.

⑤ When this case was remanded to King County Superior Court by Petitioner, she was Not under Rule 26(c)(2) (Stipulated Protective Order).

② Judge Prochnou and Respondent/Daniel Hurley were proceeding without

- Petitioner due to Judges handed signal to "Do not talk."

(1) Rule 26(j) Access to discovery Material under RCW 4.24

• Rule 26(j)(2) stated that "The person seeking access shall serve a copy of the motion on every party to the action." Rule 26(j)(1) admission pursuant to CR 26-37.

Petitioner did not make this motion. Petitioner did not agree any

rule 26(j) or rule 26(j)(1).

• Rule 26 (d) (Signing of discovery requests, Responses, and objections) stated that "a party shall not be obligated to take any action with respect to it until it is signed."

Judge ordered Petitioner to take a box without understanding what is going on without a certified Japanese translator. And Judge Prochnou

forced Petitioner to sign two papers without reading. Then Bailiff

/Terry and the court clerk/Susan (?) told Petitioner to sign two papers

at same time from Petitioner's both shoulder. Bailiff/Terry said "

"Just Put Refused." Later Petitioner found what ^① Judge Prochnou,

^② Respondent/DEF/Daniel Hurley, ^③ Bailiff/Terry, and ^④ Court clerk/Susan

were proceeding during the CR 16 conference.

Petitioner returned to DEF/Daniel Hurley and Joely Ruvall for ALL

of boxes and envelope which DEF/Daniel Hurley and Jodi Durall /K&L GATE PLL sent to Petitioner Just before CR/6 conference.

"Petitioner shall not be obligated to take any action with respect to it until it is signed the documents;" Petitioner did not sign Two documents for rule 26(g). RAP 2.5(a)(3), RAP 18.9

⊕ Judge Prochnou was manipulated Petitioner who did not understand what is going on. Judge Prochnou shout Petitioner from SPEAK. RAP 2.5(a)(3) RAP 18.9

⊕ Petitioner did not have under Rule 26(c)(2) (Stipulated Protective Order" at US District Court.

Former Plaintiff attorney/Matthew Bean and Respondent/Safeway Inc. /Daniel Hurley filed FRAUDULENT Rule 26(c)(2) (Stipulated Protective Order) without knowledge of Petitioner at US District Court Case: 2:13-cv-01127-JCC) (and FRAUDULENT Court order from US District Court.

Fraudulent rule 26(c)(2) is under Appeals Court case No. 73895-0-1 / Trial Court No. 14-2-26220-5 SEA.

(5) Petitioner did not have under Rule 26(c)(2).

(6) Petitioner did not have under Rule 26(j), Rule 26(j)(2), Rule 26(9), or Rule 26(f).

(7) Respondent/Daniel Hurley and Jodi Duvall claimed that they sent "Notice of Deposition," Petitioner did not receive it. Petitioner demanded to see original proof of mailing.

(8) Petitioner did not hear about "Alternative Dispute Resolution" conference, contacted Respondent/Daniel Hurley. Daniel Hurley did not know about "Alternative Dispute Resolution" conference date?, time?, or where?.

He knew only Judge Chung. Petitioner contacted Judge Samuel Chung's office to find "when?", "what's time?", and "where?" from the Court Clerk.

Petitioner told Respondent/Daniel Hurley that she would be there on time.

Petitioner double checked with Judge's office Three (3) days before the

conference day. Suddenly Respondent/Daniel Hurley and Jody Duvall

cancelled the conference day without telling Petitioner. RAP/8.9, 18.9(a)

(9) Respondent/Daniel Hurley filed and claimed "DEF's motion for Summary Judgment" without mailing a copy of his document.

Petitioner went to Respondent/Daniel Hurley's office to get a copy of "DEF's motion to Summary Judgment" Three (3) days before the hearing. Petitioner did not have time to file "Opposing Summary Judgment."

(10) On Summary Judgment day, Judge Prochnow started from Respondent/Daniel Hurley and Jodi Duvall. Petitioner had a Japanese translator but she was not a certified Japanese translator. She was not translated English → Japanese, Japanese → English too well. She told Petitioner to tell myself. She did not do her job as a translator.

Authorities

RAP 18.9 violate of rules

RAP 18.9(a) sanction

RAP 2.5 (a)(3) manifest error affecting a constitutional right.

CR 60 - Not Fully adjudicated

Fundamental Default

6) Threat by Safeway Inc, Port Angeles manager / Mike LaGrange.

• On April 05, 2011

Safeway Inc. accused Petitioner for stalking some one(s),

Petitioner was shopping and talking to Safeway Inc, management for short in pay check, reframe

• On April 06, 2011 Mike LaGrange / Ken Burnes / Union representative

Safeway Inc. accused Petitioner for stalking some one(s) ?

Safeway Inc. accused Petitioner for stealing Safeway's information ?

Safeway Inc. accused Petitioner for suspicious transaction ?

Mike LaGrange and Ken Burnes watched Security video camera, without

Petitioner, They COERCED Petitioner to write three accusations address

to Ken Burnes (Security Dept.). Then Ken Burnes would transfer my letters

to Sue Bonnett (Labor Relation manager), Union representative (witness) was

witness at first refused to represent, then after being subjected to maltreatment

and being held Petitioner as a prisoner in the defendant room, and yielded

to their demand and threat by "terminating Petitioner." for TWO HOURS.

Mike LaGrange and Ken Burnes Refused Petitioner to bring her lawyer

to look Security video camera which accused by Safeway Inc.

Petitioner was threaten for termination. This incident was the Wrongful accusation and defendants were guilty of Coercing to wright the statements by means of a "threat" to make a wrongful accusation of crime.

[State v. Barr, 120 P. 509, 67 Wash 87]

• Safeway Inc. accused former employee (Ms. F) for chasing out the Customer from the Store by Security video camera.

This person worked more than 10 years - loose benefit for 10 years.
This person is closed to retirement. - loose retirement.

• Safeway Inc. accused former employee (Mr. F) for using Bad Language to employees by management.

Safeway Inc. COERCED this person to wright the statement. After that this person got suspended about one month. Loose Health Insurance, Loose benefit for more than 5⁺ years.

• Safeway Inc. accused former employee (Ms. C) this person who forgot to get customer's signature by management.

Many employees forget to get customer's signature for WIC (Women and child program check). Part of Bookkeeper's job to check the customer's signature before sending the checks to the bank.

Why only one paticuler employee who is over 40⁺ years and worked for ever 15⁺ years. Management are targeting specific employee who works for longtime. Even management forgot to get the signature from the Customer.

This person got suspension for about one month → No income, Loose Health insurance, Loose retirement.

This person signed the document which this person would not suit Safeway Inc. then return to work, then Fired this person. (Illegal business Practice)

(C) Threat by Safeway Inc. Port Angeles manager / Mike LaGrange

- Prima Fisher

Petitioner worked "Full time" at Retail store for more than 15⁺ years.

- September 2004 - November 2004 2nd Bookkeeper + give break for Video emp. manual bookkeeping.
- November 2004 - December 2008 Head Bookkeeper with manual bookkeeping.
- December 2008 - May 07, 2011 Demoted from Head Bookkeeper without title as 2nd Bookkeeper, but same Two jobs (Bookkeeping + Video Counter)

Safeway Inc. has illegal practice to fire employees or to demote during

November to December every year because busy season, so not many

employees notice. Most of time, ① couple employees from Management

level, ② close to retirement age employees, ③ close to 5⁺ years, 10⁺ years

15⁺ years and 20⁺ years-employees, and ④ welfare benefit employees

hired as business credit from welfare system.

Petitioner's former 2nd Bookkeeper left on October 2004, then Head

Bookkeeper called in the manager's room. Suddenly Head bookkeeper left.

Petitioner became a head bookkeeper on November 2004. When 2nd bookkeeper

left for medical leave due to her terminal cancer father for two months.

Erika Wilson (management) who took care of employees personal Depart-

ment. When 2nd bookkeeper came back to work after her father passed away, she lost seniority, all benefits. Erika Wilson (management) intentionally did not take care of 2nd Bookkeeper's paperwork. 2nd Bookkeeper left early 2008.

Then, Mike LaGrange and Erika Wilson started to reduce Petitioner's work hours from 8 hours to 7 hours, then 7 hours to 6 hours to finish bookkeeping job while she was working at Video Counter. Petitioner had to finish two jobs at same time. Plus Mike LaGrange and Erika Wilson added more extra jobs. For example: They told Petitioner to refill coin changer when \$90 or less. According to Accounting Dept., it should refill coin changer under \$50 or less. Twelve (12) coin changer to refill plus twelve (12) coin changer. At least 24 coin changer. Then Mike LaGrange and Erika Wilson added Bookkeeping job to refill before leaving her shift. (Added Counter productive jobs). Petitioner asked other Safeway Inc bookkeepers to find that only Port Angeles store doing procedure. (Harassment/intimidation/forced to quit)

(2) Mike LaGrange and Erika Wilson

Most important equipment in Bookkeeping is 10-key adding machine.

Petitioner asked to have a 10-key adding machine which all function work. Petitioner did Not ask for New one. LaGrange and Wilson did not provide any 10-key all function work machine.

Most of Bookkeeper would quit. Company policy said No personal electric machine. So, Petitioner brought Japanese abacus which does not require. Petitioner used Abacus for Eight (8) months which management did Not provide (despised treatment.)

(1) On January 2011,

Mike LaGrange called Petitioner to come 1 PM to work. Few hours later, Mike LaGrange suspended Petitioner. And two management celebrated High Five and laughing.

(2) On July 07, 2010. Safeway Inc. should pay for damages.

Petitioner needed to go to bathroom, management did not give

Petitioner to go to the bathroom. Petitioner contacted Mike LaGrange.

He told me to wait until Petitioner's lunch break or Petitioner's

break. When Petitioner went to the bathroom. It was filthy and No toilet papers, No toilet seat covers. It was not clean from that morning

Petitioner got accident in the bathroom. Petitioner tried to file the accident report, Mike LaGrange threatened Petitioner to Not to file.

Mike LaGrange told Petitioner that he needed pay \$10,000 for penalty.

Petitioner could not file accident report for more than 4 hours.

After that Petitioner went to Emergency room. Safeway needs to pay 15 minutes which Company did not give break.

Petitioner had work related accidents. Every time, Mike LaGrange threatened to Not to file the accident report.

Mike LaGrange claimed Petitioner did not file immediately and gave a Corrective action Notice, He threatened Petitioner to sign,

() Safeway Inc. accused Petitioner for stalking someone (s)?

Petitioner was shopping.

() Safeway Inc. accused Petitioner for stealing Safeway's information.

Petitioner told Mike LaGrange and Ken Burnes to show the video tape,

so she could explained what they were talking about. They did Not show her

Mike LaGrange and Ken Burnes Refused to show to Petitioner's attorney

() Petitioner went to Vacation for 3 weeks, 20 hours + 20 hours + 20 hours. Safeway Inc. management did not pay 20 hours in 2nd week, Company paid only 16 hours which cause loss for Petitioner's spouse medical/dental/optical coverage. Petitioner complained to this manager. he did not change.

() after Petitioner came back from Vacation, Mike LaGrange suspended Petitioner for about One month. Then Fired Petitioner without paying for One month. Safeway Inc. should pay for damages.

() Work related injuries

- ① ankle and Caf Kimberley Stewart did not give any
- ② both hands accident reports to Petitioner.
- ③ Face Petitioner has rights to have.
- ④ Finger

() Safeway Inc. has pattern of Bad business practice for firing

Conclusion
① Petitioner filed multiple work related injuries due to Harassments, intimidations, ② Harassments, ③ intimidations, ④ Wrongful termination ⑤ Cheating Petitioner's wages which Mike LaGrange did not pay, ⑥ losing employees benefit by management intentional, ⑦ DeFrame by Safeway Inc., ⑧ Work related injuries damages, ⑨ lost pension funds amount.

Safeway Inc. did Not answer all of above.

② DEF/Daniel Hurley did not mail Alternative Dispute Solution Notice

③ DEF/Daniel Hurley did not mail Deposition Notice to Petitioner

④ DEF/Daniel Hurley did not mail "Motion for DEF/Summary Judgment" documentation. Petitioner went to Daniel Hurley's office to pick Three (3) days before Summary Judgment Hearing.

Intentionally he did not mail to Petitioner.

⑤ many documents claimed at the Case by Daniel Hurley, many documents were not mail to Petitioner.

⑥ Petitioner did not have Rule 26.

① Appeals Court Div [I] DENIED Petitioner to file Appellant's Brief.

② Appeals Court Div [I] only allowed Petitioner's preliminary Brief by

Three Judges Panel without attaching evidence

(9) Appeals Court Div [I] DENIED Petitioner's Amicus Brief as Appellant's Brief.

(10) Appeals Court Div [I] allowed Petitioner's Amicus Brief as Appellant's

Reply which it is without oral argument hearing: useless.

Appeals Court did NOT consider any merit for Amicus Brief.

(11) Appeals Court Div [I] allowed Respondent 2nd Brief without sending to Petitioner, (irregular court proceeding).

Respondent's Brief should be Sanction by the Court.

Respondent's Brief should be DEFAULT Judgment by the Court

Respondent's Brief should be strike from this Case.

(12) Appeals Court Div [I] allowed Respondent's Brief Only.

Appeals Court Div [I] Denied all of Appellant's evidence.

(13) Then Appeals Court Div [I] claimed that Frivious claim by Petitioner.

Appeals Court Div [I] Denied all of Petitioner's evidence in the three cases documents. [discrimination by the Court against Petitioner.

(14) Petitioner will not pay because Appeals Court discriminate my evidence.

(15) Petitioner demands to have all of Petitioner's cost from DEF/Daniel Hurley

(16) Fundamental Default by DEF/Daniel Hurley.

(17) Petitioner did not have any rule 26 which it is Gag order.

(18) Petitioner demands to pay damages by DEF/Safeway Inc.

(19) Supreme Court did not give Petitioner's event lists until 11/22/2016.

(20) Supreme Court clerk Refused to give Petitioner's event lists

until 11/22/2016. She gave Petitioner for case summary which

Supreme Court clerk claimed as Public information. It does not

show any information

(21) Supreme Court Refused to print Petitioner's documents which

Petitioner asked. The clerk print part of Petitioner's request.

The Clerk DELAY Petition.

(22) Appeals Court DIVE and Supreme Court discriminated against

Petitioner. And The Courts REFUSED to take Petitioner's

documents/evidence.

(23) Petitioner's case documents are missing, tampering by the Court.

(24) Petitioner filed many evidences to three Court Cases.

Why Petitioner's evidences are missing from the Court cases?

H. Harborol 11/25/2016 P O Box 112 Sequim WA 98382
H. Harborol 11/28/2016

Certified of Service

I certify that 11/28/2016, I handed to Supreme Court in Olympia

Daniel Hurley 925 4th Ave Ste 2900 Seattle, WA 98104