No. 47149-3-II

COURT OF APPEALS
DIVISION II
OF THE STATE OF WASHINGTON

Pamela O'Neill, Appellant

v.

The City of Port Orchard, Respondent

REPLY BRIEF OF APPELLANT

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I. INITIAL FACTUAL REBUTTAL.

Defendant mischaracterizes a number of facts in its response brief, which need correction.

A. Plaintiff's eyeglasses

First, the City complains because Ms. O'Neill was not wearing her glasses at the time of the fall, implying her negligence. Response brief, page 5. However, she makes clear that she has reading glasses, which would impair her vision if worn while riding. At CP 98, starting at page 43 of her deposition, line 20:

Q. Were you wearing glasses or contacts on the day of the incident?
A. No.
Q. Does that affect your ability to see?
A. It affects my ability to see wearing them.
Q. So you put on your glasses and your vision gets worse?
A. When I'm riding my bike, due to the bifocal, yes, it's worse.

B. Plaintiff's Consistency of Statements

Second, defendant claims that plaintiff was inconsistent in her identification of the conditions which made her fall. She was not inconsistent, though she was asked at least four times in different ways what made her fall. In each answer, it was the rough surface of the roadway, which was different than the smooth area leading up to it, and which turned her tire, causing the crash. Defendant also omitted the following answer at page 25, line 10, CP 95:

Q. Please explain the significance of X 2 [a deposition exhibit] as it relates to the cause of your fall on the incident.
A. At the point of X 2, drawn on the picture on Kitsap Boulevard and Sidney Avenue, the road had been repaired along the space heading

> downhill. Parts of the repair were missing. The road was uneven and poorly patched causing unsafe for bicycle tires.
>
> At the beginning where I've marked on Exhibit 4 is the start of the repair of the asphalt to raise the level of the space.

While she describes what the roadway did to her tire, changing its direction, she was always consistent as to what road conditions caused her fall and where those conditions are.

C. Conclusions of Plaintiff's Expert Witness

Third, the City mischaracterizes the testimony of Plaintiff's proposed expert James Couch. At page 9 of defendant's brief they state: " Here, Mr. Couch makes the factual conclusion that Plaintiff's bicycle engaged the defect between two concrete slabs that ran parallel to Plaintiff's direction of travel." This implies he concludes her tire was trapped. They repeat and reinforce that mis-characterization on the same page: "She never states in her deposition that her tire became caught in a void, gap, or separation between any concrete slabs." A careful reading of Couch's declaration, CP 124C - 124D, shows that Couch never concluded or stated that her tire became entrapped. He instead focuses on the height differential where the slabs have separated, running the length of the slab, and the orientation of the defect being parallel to travel. His conclusion is that the height differential of the slabs prevented Pamela O'Neill from steering her bicycle, causing loss of control and a crash. The defense attempts to create a straw-man argument, which they can then easily discredit.

D. Lack of Complaints of Other Accidents at this Site

Fourth, defendant claims it never received a complaint about this roadway from any other bicyclist, so the City cannot be on notice of any need for corrective action, and had no duty to repair its streets. It is hard to understand how the lack of a complaint would be known, as the City kept such poor records that the City Engineer did not even have any documents showing when the prior road patch repairs were performed, Dorsey deposition, p. 54, line 17, CP 109, which they acknowledge were done by the City. This City Engineer had only been on the job since June, 2008, so the City's institutional memory was only as deep as his tenure. CP 104. Again, this injury occurred on July 18, 2009, 13 months into his tenure with the City. CP 29. He acknowledged that before his tenure, records were poorly kept. Dorsey Deposition, Page 67, line 2-9, CP 111. Absence of a public record is only proof of non-existence of any matter, if such records are actually kept in the regular course of business. ER 803(a)(10). *Compare, State v. N.M.K.*, 129 Wn.App. 155, 118 P.3d 368 (2005)(relating to lack of a record of a driver's license.)

In fact, even this injury event, which undisputedly involved a bicycle injury on a city street, known by the city police, was not brought to the attention of the City Engineer until the RCW 4.96.020 claim form was filed and reviewed almost three years later. From the deposition of Mr. Dorsey, starting at page 81, line 23, CP 115:

Q. So you never saw the police report that was generated until the tort claim attached it and sent it in?

A. No, I saw this as part of the tort claim.
Q. So in 2009, you didn't see it, '10, '11, not until 2012?
A. No, the first time I saw it it was attached to the tort claim.
Q. So the police didn't sent it to you after they generated the report in this case?
A. Right, and I would be making assumptions as to why that didn't occur.

This shows that the City had no regular, reliable method to review accidents in the city so that they could base maintenance decisions. The absence of known prior complaints is not compelling proof that there have not been any complaints. It just shows that they did not always log such events for remedial review and action, and could not find them later. To the extent that they claim no duty as there was no notice, their argument must fail.

E. Lack of Bicycle Complaints at other Sites

Fifth, the unqualified statement of the City on page 6 that the city has never received a complaint from a bicyclist concerning its street conditions is untrue. When confronted, Mr. Dorsey had to admit another incident from 2003 in which the city paid a claim to a bicyclist. Dorsey Deposition page 39, starting at page 9, CP 107:

Q. And just for the record, it appears that this fellow went up the ramp on one side and found stairs on the other and fell down it. I think I'm probably paraphrasing it. You haven't looked this through so I don't want to surprise you by documents in here but there's some photographs of the old stairs, and I think the City paid $300 to fix his bike.
A. Again, that happened in 2003; that was five years before I came[1], so that's telling me that the City's had two bicycle claims in the last ten

[1] Showing again that the institutional memory of the city is only as long as the tenure of its employees.

years. This has been rectified. Those stairs are now gone. And if you've been down to waterfront, you'll see that the improvements there are significantly more bike friendly.

F. Quantitative Analysis

Sixth, the city at page 9 of its briefing complains that plaintiff's proposed expert, Mr. Couch, performed no "quantitative analysis" as to what may have caused plaintiff's fall. Assuming "quantitative analysis" means "the collection, organization, analysis, interpretation and presentation of data" as Wikipedia defines it at https://en.wikipedia.org/wiki/Quantitative_analysis, then they are most certainly wrong. Mr. Couch's declaration expressly describes a number of measurements taken at the site during his site visit, and his analysis of what those measurements mean. CP 124A-E. Otto Declaration, CP 87, line 28, and photographs exhibits, CP 122, show Mr. Couch actually inspecting and photographing the site. In contrast, the City has done no empirical study of the site at all, with the defendant's 30(b)(6) witness taking no measurements or photographs. Dorsey Deposition, page 34, starting at line 12, CP 106:

Q. All right. Now, you said you viewed the site after receiving the deposition notice. Did you go by there today?
A. We drove through the intersection because that was the most direct route here.
Q. When you went to the site as you referenced after receiving the subpoena, did you do a more thorough inspection or examination of that intersection?
A. Yes.
Q. And what did that entail?
A. Just looking at the intersection and the surfacing conditions of the intersection.
Q. Did you take any photographs or measurements?
A. No.
Q. So it was just a visual view of the site?

A. Yes.
Q. To your knowledge, after this lawsuit has been filed, has the City created or documented the scene through an investigator or a police officer or anybody else that would have taken photographs and measurements?
A. No.
Q. And after the complaint was filed with the City but before the lawsuit was actually initiated, do you know if there were any measurements, photographs or inspection, other than you described that you think someone may have gone out there?
A. There's been none.

If this is the standard by which Mr. Dorsey bases his opinions, then Mr. Couch in comparison was eminently more thoroughly prepared and more qualified to express opinions.

G. Factual Support for Expert's Conclusions

Seventh, the city complains at page 9 of its brief that Mr. Couch makes statements which are unsupported by the evidence in the record that "the slabs in question are separated from each other by a distance that varies, from 2 to 6 inches, and one as wide as 11 inches." This ignores the fact that Mr. Couch's statements were sworn under oath, and are testimony, which is evidence. RCW 9.72.085. The City's complaint seems to be that Mr. Couch did not document all of his measurements with photographs, as if his sworn testimony is somehow not enough. The statements are competent evidence and need no verification to be considered as evidence in a summary judgment proceeding. Further, Mr. Couch has testified about the condition of a public street, a site which readily available to the defendant for measuring, photographs, and rebuttal, if any inaccuracies were submitted by Couch. No rebuttal was offered.

II. LEGAL AUTHORITIES & ARGUMENT

A. Defendant's Duty of Care

Defendant acknowledges that it has a duty to maintain roads safe for ordinary travel. *Keller v. City of Spokane*, 146 Wn.2d 237, 44 P.3d 845 (2002). Plaintiff's initial briefing explained in detail why bicycles are part of ordinary travel for which the city must maintain roads. Defendants acknowledges that bicycles are given rights to use the roadways under RCW 46.61.755, yet makes a statement at page 17 that "This statute should not be interpreted to create an additional duty for municipalities to maintain roadways in reasonably safe condition specifically for a bicyclist." There is a complete lack of authority offered for this position. More than that, there is no authority to be found for this position. That position is contrary to the Washington State Supreme Court's conclusion in discussing a bicycle injury that application of the recreational immunity statute to a transportation corridor would "unjustly relieve the government of its common-law duty to maintain roadways in a condition reasonably safe for ordinary travel" imposed by *Keller*, *supra*. *Camicia v. Howard S. Wright Construction Co.*, 179 Wash.2d 684 at 699, 317 P.3d 987 (2014).

The City's position misses the point that if bicycles have the right to use the roads, and are known by city officials to use the roads regularly, as they concede, then the city must have roadways which are reasonably safe for bicyclists. Simply put, bicyclists are ordinary travel, in a *Keller* analysis.

Bicycles by definition have only two wheels, and they are small, and easily trapped, and easily redirected by smaller surface defects and hazards than would be a problem to an automobile, and they provide no protection from impact. Bicycles present other challenges not presented by this case, including: they are hard to see for motorists, motorists do not anticipate presence of bicycles on the roads, and their ability to brake is impaired by small contact area with the pavement. In meeting its *Keller* duty to maintain safe roads, hazards to bicycles need to be identified and remedied. The city failed to do this here, allowing to exist, for a very long time, the hazard which injured Pamela O'Neill.

Defendant acknowledges the law that the City can be on notice of a defect by either actual notice, or by constructive notice if the defect was old enough. Defendant's Brief, page 19. Please also see *Ingersoll v. DeBartolo*, 123 Wash.2d 649; 869 P.2d 1014 (1994). However, the City offers little to no analysis of the established fact that its roadway slabs have not been maintained since approximately 1945, except for the evidence of prior patches on the slabs which patches "could have been ten to thirty years old" and were applied by the City to "reduce the differential for vehicles so that it wasn't so abrupt." Dorsey deposition, p. 67 line 20 to p. 68 line 2. CP 111. If they were placed to reduce the height differential that long ago, how is the hazard less when the patches have been worn for ten to thirty years?

The City also does not recognize or offer analysis that this issue arises in a summary judgment context, where evidence is to be viewed in a light

most favorable to the non-moving party, and where issues of fact are for juries to decide, except in the most straightforward issues, where reasonable minds could not disagree. *Ranger Ins. Co. v. Pierce County*, 164 Wash.2d 545; 192 P.3d 886 (2008). With all the presumptions surrounding Summary Judgment, the trial court simply erred by dismissing this claim.

B. Assumption of Risk

Plaintiff stands on her initial analysis of the trial court's plain error in concluding that Ms. O'Neill was engaging in the sport of bicycling, assuming any risk, and will not repeat it here. Nothing in defendant's briefing addresses the fact that there was no evidence that she was engaged in sport at the time of the injury, and that there was unrebutted testimony that she was commuting to and from work, using the road for transportation.

It is interesting to note, however, that defendant acknowledges that its street was so dangerous that anyone bicycling down it would assume a risk. At page 23 of the defense brief, the City states: "plaintiff affirmatively chose to accept the risk of traveling this route and because of this, the trial court did not err in finding she is barred from claiming negligence of the City." If there is any degree of negligence by the plaintiff for willingly encountering a hill on defendant's public street, which we deny, then it should be considered on the comparative fault analysis which *Keller v. City of Spokane*, 146 Wn.2d 237, 44 P.3d 845 (2002) requires. The City conceded that this road is dangerous.

C. Proximate Cause

Defendant raises now at page 24 of its brief the issue of proximate cause. Defendant raised no issues relating to proximate cause below. Their motion at the trial court was based on a challenge only 1) that defendant did not breach its duty of care, and 2) Assumption of risk arguments. Please see their motion, at CP 16.

This failure to raise issues as to proximate cause at the trial court is fatal to any claim for summary judgment on this basis, and they cannot raise it on appeal.

> In a summary judgment motion, the moving party bears the initial burden of showing the absence of an issue of material fact. *See LaPlante v. State,* 85 Wash.2d 154, 158, 531 P.2d 299 (1975). If the moving party is a defendant and meets this initial showing, then the inquiry shifts to the party with the burden of proof at trial, the plaintiff. If, at this point, the plaintiff "fails to make a showing sufficient to establish the existence of an element essential to that party's case, and on which that party will bear the burden of proof at trial," then the trial court should grant the motion. *Celotex Corp. v. Catrett,* 477 U.S. 317, 322, 106 S.Ct. 2548, 2552, 91 L.Ed.2d 265 (1986) [emphasis added].

Young v. Key Pharm., Inc., 112 Wash. 2d 216, 225, 770 P.2d 182, 187 (1989). As the defendants never raised the issue, nor met their initial burden as to the absence of proximate cause as a material fact, plaintiff was never put to the proof and did not respond to such an absent argument.

Generally, failure to raise an issue before the trial court precludes a party from raising it on appeal. *Smith v. Shannon*, 100 Wash.2d 26, 37, 666 P.2d 351 (1983); RAP 2.5. Indeed, it would be fundamentally unfair to raise an issue now for which no record has been made. Had they challenged

proximate cause at the trial court level, the briefing and evidentiary support would have been significantly different to address the challenge, and the appeals court could then review sufficiency. Without the initial showing required by case law, plaintiff never was put to the test of proving facts sufficient to overcome a challenge to proximate cause.

D. Defendants Ignore Summary Judgment Fundamental Principals

Consistent throughout defendants brief are references to facts and allegations which impugn the established evidence and invite the court to speculate about non-proven facts, and to invite the court to ignore the presumptions in summary judgment considerations and weigh the evidence, and to draw presumptions against plaintiff. Some examples are:

1. Claims that plaintiff was inconsistent in her answers as to what made her fall, when she marked on an exhibit the exact location of what made her fall, which exhibit they did not provide to the trial court, and is not in the record. Defendant's brief pages 3-5.
2. Claims that she assumed the risks of riding a bicycle. Defendant's brief page 3, 19-25.
3. Claims that it is inherently dangerous to ride bicycles. Defendant's brief page 3, 19-25.
4. Claims that vehicular traffic caused her to fall. Defendant's brief page 3, 25.

5. Claims in Defendant's brief page 25 that she was negligent, riding too fast, contrary to the evidence. O'Neill deposition, p. 62, lines 2-11, CP 101.

6. Claims that she was distracted by parked cars, without evidence and contrary to the evidence. Defendant's brief page 3, 25.

7. Ignoring the established fact that Ms. O'Neill was commuting by bicycle, and using the road for transportation, and reducing it to a mere allegation. Defendant's brief page 22, 23.

On this De Novo review, we ask the court to resist defendant's invitation to ignore the constitutionally required strong presumptions that all reasonable inferences are to be drawn in favor of the non-moving party, and that juries, not judges, are to resolve disputed facts. If the roadway is inherently dangerous or misleading, then the trier of fact must determine the adequacy of the corrective actions under all of the circumstances. *Owen v. Burlington N. & Santa Fe R.R. Co.*, 153 Wash. 2d 780, 789 90, 108 P.3d 1220, 1224 (2005); *Goodner v. Chicago, Milwaukee, St. Paul & Pac. R.R. Co.*, 61 Wash.2d 12, 17–18, 377 P.2d 231 (1962).

E. Disqualification of Expert Witness Couch

Initially, we apologize for citing an unpublished case, *Kill v. City of Seattle*, 183 Wn. App. 1008 (2014), at page 32-33, as defendant correctly identifies. Please disregard that case. However, we also quoted from a cited case the same principle that the "de novo standard of review is used by an appellate court when reviewing all trial court rulings made in conjunction

with a summary judgment motion." *Folsom v. Burger King,* 135 Wn .2d 658, 663, 958 P.2d 301 (1998). This permits the appellate court to consider that which the trial court considered in weighing the summary judgment motion.

We submit that the trial court erred by denying expert status to Mr. Couch. He has extensive experience knowing the needs of bicycles and the hazards presented by even a one inch lip, running parallel to the direction of travel. We submit that it was an abuse of discretion to deny the jury his insights and expertise, particularly as to understanding why a one inch ledge would crash a bicycle. As pointed out by the defense in addressing plaintiff's testimony on this very point, although plaintiff knew exactly where she crashed, she did not know why she lost control and why her tire turned when she encountered this damaged roadway. As she stated at her deposition, page 21, line 21-25, CP 94:

Q. .....Can you describe to me again what happened to the wheel of your bicycle prior to the fall?
A. All of a sudden the bike changed directions with the front tire. That's all I know.

And further, at page 28, line 25, CP 95, to Page 29, line 1, CP 37[2]:

Q. You said your tire changed direction. How did this uneven condition cause your tire to change direction?
A. I don't know.

Mr. Couch has the expertise and training to understand why her tire turned at this spot, and answers that very question. It is undisputed and

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[2] When these materials were compiled for the motion, both parties provided only part of this quote, ascribing little import to it, to keep the materials brief instead of including the entire deposition. Now the entire quote is provided, but piece-meal.

undisputable that Ms. O'Neill, after commuting on her bicycle for a year with no problem, lost control when her bicycle tire turned and she crashed as she encountered these road defects. Mr. Couch's technical expertise and insights will "assist the trier of fact to understand the evidence or determine a fact in issue."

A person can be qualified as an expert to express opinions under ER 702 if they possess "scientific, technical, or other specialized knowledge." Not every expert need be a scientist, and many are qualified by experience alone. Not every expert will be required to perform complex calculations as a predicate to express opinions about their field of knowledge. Mr. Couch has a life long career working with bicycles and the needs of bicyclists.

In the case cited by Defendants, *Miller v Likens*, 109 Wn.App. 140, 34 P.3d 835 (2001), the expert's conclusions were excluded because he had no factual basis to draw conclusions about point of impact, other than a witness's testimony, which was in conflict with other witnesses. The physical evidence was as consistent with the injured pedestrian being struck in the center of the roadway as it was with being struck on the shoulder. The expert was basing his opinion on credibility determinations. The lack of quantitative analysis was one factor considered to exclude the expert, but it was not the only factor. There was no factual basis for the opinion at all, so it was excluded. Compare *Miller v. Likens, supra* with *Gerberg v. Crosby*, 52 Wash.2d 792, 329 P.2d 184 (1958) in which expert opinions about the point of impact were permitted when based on observations at the scene of

the accident, showing when a skid mark changed directions. That opinion required no calculations using formulas and physics laws, no quantitative analysis, as it was based on evidence at the scene and the experience and training of the officer allowed to express opinions.

In the present case, Couch's testimony was based on a site visit, measurements at the site, and review of plaintiff's and Dorsey's depositions, and interviewing plaintiff at the site. Unlike in *Miller v. Likens, supra,* there is no controverting eyewitness testimony. An expert can rely on hearsay if it is the type of evidence reasonably relied on by those in that field. ER 703; *Deep Water Brewing, LLC v. Fairway Resources, Ltd.*, 152 Wn.App. 229, 215 P.3d 990 (2009). *See also Owen v. Burlington N. Santa Fe R.R., Inc.*, 114 Wn. App. 227, 237, 56 P.3d 1006, 1012 (2002) aff'd sub nom. *Owen v. Burlington N. & Santa Fe R.R. Co.*, 153 Wash. 2d 780, 108 P.3d 1220 (2005), which allowed consideration of witness declarations and a site visit as a basis of expert testimony, and which required no complex calculations.

F. Foreign Cases

In our initial brief, plaintiff has cited cases from other jurisdictions as to how other states address similar issues. Defendant summarily dismisses them as not binding. Of course they are not binding, but to the extent they are persuasive, they assist the court in resolving these issues. Courts often cite foreign law, as the rationale of the cases often illuminates the issues. *See, e.g, Dillon v. Seattle Deposition Reporters, LLC*, 179 Wash. App. 41, 87, 316 P.3d 1119 (2014), cited with approval in *Davis v. Cox*, 183 Wash. 2d 269,

351 P.3d 862, 870 (2015), as to contrasting California authorities and Minnesota authorities in interpreting similar statutes.

Even decisions of other Divisions of the Court of Appeals are not binding on this court, except to the extent it is persuasive authority. *State v. Brooks*, 157 Wn. App. 258, 236 P.3d 250 (2010), *State v. Simmons*, 117 Wn.App 682, 73 P.3d 380 (2003).

The trial court itself cited foreign law, *Spence v. U.S.*, 374 Fed.Appx. 717 (9th Cir., 2010), in finding that bicycling is a sport for the principle that plaintiff assumed the risk. That case, and those cases it cites, most from other jurisdictions, are not persuasive, as we have pointed out by reading them and their underlying authorities.

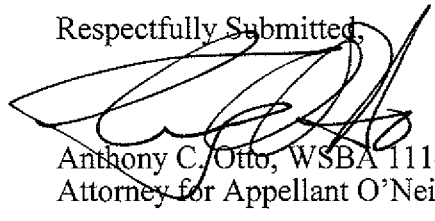
The defendant does no analysis of the cited foreign cases, other than dismissing them. The City gives no analysis of *Cotty v. Town of Southampton*, 64 A.D.3d 251, 257, 880 N.Y.S.2d 656, 661 (2009), which had a well reasoned rejection of assumption of risk arguments as to a bicyclist using a public roadway. Any analysis at all would conclude that application of assumption of risk principles to roadway traffic would eliminate all liability for negligence, which is contrary to any notions of a rule of law in an orderly society. It would invite, as defendant's attorney suggested to plaintiff in deposition, a "free-for-all." Plaintiff's deposition, page 14, line 7, CP 36.

III. CONCLUSION

The court should find that the City has a duty to maintain roadways reasonably safe for ordinary travel, and rule that ordinary travel includes

bicycles. The court should rule that plaintiff assumed no risk which relieves the City of such duty. The court should find that, in a light most favorable to Ms. O'Neill, there is evidence that the City was on notice of the defect which caused her injury, and that reasonable persons could at least differ as to whether the City of Port Orchard was negligent, and overturn the trial court decision dismissing the case. The court also should overturn the trial court in its disqualification of the injured party's expert witness as Mr. Couch has significant training and experience in knowing what conditions are hazardous to bicycles, and should be permitted to express opinions thereon under ER 702 . As reasonable minds might differ on the City's negligence, summary judgment should not have been granted, and the decision should be reversed, and the matter remanded for trial.

Respectfully Submitted,



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WASHINGTON STATE COURT OF APPEALS
DIVISION TWO

PAMELA O'NEILL, a single person,
Appellant,

vs.

THE CITY OF PORT ORCHARD, a municipal corporation,

Respondent.

CASE #47149-3-II

DECLARATION OF SERVICE

Plaintiff alleges:

I, Karen Alfano, declare under penalty of perjury under the laws of the State of Washington, that on this day I sent by electronic mail a copy of Reply Brief of Appellant addressed to:

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Signed on this 10th day of August, 2015, at Port Orchard, Kitsap County, Washington.

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