No. 93594-7

SUPREME COURT OF THE STATE OF WASHINGTON

CITY OF SEATTLE, Petitioner, v. DANIEL SCHULTE, et al., Respondents.	**PETITIONER CITY OF SEATTLE'S NOTICE OF SUPPLEMENTAL AUTHORITY**

Petitioner City of Seattle submits as supplemental authority (1) a copy of Judge Bruce E. Heller's August 31, 2016 Memorandum Opinion dismissing plaintiffs' claims for negligent supervision and negligent release in *Harper v. State of Wash. Dep't of Corr.*, King County Superior Court Cause No. 14-2-32600-9 KNT, and (2) a copy of Judge Heller's October 12, 2016 Order Granting State's Motion for Reconsideration dismissing plaintiffs' claim for negligent infliction of emotional distress in the same action.

RESPECTFULLY SUBMITTED this 27th day of October, 2016.

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IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON
IN AND FOR THE COUNTY OF KING

CATHY HARPER, individually, as a Personal Representative of the ESTATE OF TRICIA PATRICELLI, as Guardian Ad Litem for KHALANI MICHAEL, a minor child, and as Guardian Ad Litem for NIYERRAH MICHAEL, a minor child, v. STATE OF WASHINGTON, DEPARTMENT OF CORRECTIONS, a governmental entity, Defendants.	**No. 14-2-32600-9 KNT** MEMORANDUM OPINION

I. INTRODUCTION

On October 30, 2012, 15 days after his release from prison, Scottye Miller murdered Tricia Patricelli. In this lawsuit, Patricelli's mother, Cathy Harper, has brought this suit individually and on behalf of Patricelli's two minor children, Khalani and Niyerrah Michael, against the State Department of Corrections ("DOC") alleging (1) negligent supervision of Miller, (2) negligent infliction of emotional distress, and (3) negligent early release of Miller from prison.

Judge Bruce E. Heller
King County Superior Court
513 Third Avenue, E-955
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The court grants the motion to dismiss claims 1 and 3 and denies the motion to dismiss claim 2.

II. FACTS

Miller has a long criminal history, much of it involving domestic violence towards Patricelli. Freeland Decl., ¶4. On May 18, 2012, Miller pled guilty to Felony Harassment and Assault 4 – Domestic Violence and was sentenced to a Drug Offender Sentencing Alternative ("DOSA"). The felony sentence imposed three to six months in treatment, followed by 24 months of community custody. On the misdemeanor, the court imposed 24 months of supervision and a no contact order ("NCO") that allowed Miller telephone contact with Patricelli and personal contact while he was incarcerated or in treatment. *Id.*, ¶9. As a result of Miller fighting during two separate DOSA placements, the court revoked the DOSA sentence and incarcerated Miller until his October 15, 2012 release date. *Id.*

On August 21, 2012, Angela Coker of the Department of Corrections was assigned as Patricelli's Community Victim Liaison ("CVL"). On September 12, 2012, Coker telephoned Patricelli to let her know she was available to assist her and also sent her a letter informing her of Miller's October 15, 2012 release date. Coker Decl., ¶13. On September 21, 2012, she again called Patricelli. During that conversation, Patricelli informed her that she did not intend to resume her relationship with Miller because she did not think he had changed. *Id.* ¶14. Patricelli also told Coker that "talking to her was a waste of time because [Miller] is not going to be supervised." Freeman Decl., Ex. 2, at 2. On September 25, 2012, Patricelli asked Coker to help her break her lease so that she could move from Kent to Auburn. Patricelli told her that Miller would not know the new address. Patricelli did not provide Coker with the new address. According to Coker, she did not question Patricelli about the move because Patricelli

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wanted to keep her new address confidential, and Coker did not want to create a record of the address. *Id.*, ¶17.

Coker last spoke with Patricelli on October 17, 2012, two days after Miller's release from prison. Patricelli informed her that she was in the process of moving, that she had no problems and that she was prepared to call the police if needed. *Id.* at ¶19. Coker believed that Patricelli was not in contact with Miller and had no intentions of resuming contact with him. Coker informed her that she could contact DOC at any time if she had any questions or concerns. *Id.* Tragically, Coker's assumptions were incorrect. As soon as Miller was released, he began staying with Patricelli and moved with her to Auburn where he murdered her on October 30, 2012. Decl. of Khalani Michael.

During his incarceration, Miller was classified as "risk level high violent." Carney Decl., Ex. 9. Prior to Miller's release from prison on October 15, 2012, DOC counselor John Walner expressed concerns to Coker about the danger Miller posed to Patricelli. In an August 28, 2012 email, he wrote:

> "I am trying to complete a 10-day early release date on this guy and I notice OMNI says there are no community concerns. It seems like the police reports in Liberty would suggest otherwise. It seemed like the victim was scared of the guy and that he may have made statements that he would kill her."

Carney Decl., Ex. 65. Coker responded, suggesting that Walner prepare a Threatening Behavior referral form, a suggestion Walner followed. *Id.* In the form, Walner provided the following information:

> "Inmate Miller 846813 threatened to kill his victim Tricia Patricelli, who was his girlfriend at the time of the crime, if she called the police after a domestic altercation where the victim received blows that resulted in her face becoming swollen. . . While conducting his classification interview, Inmate Miller described how he would continue the relationship with the victim and his children. . . Inmate Miller continued to make statements of getting back together with the victim, who has current NCO . . .

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Carney Decl., Ex. 58. On September 12, 2012, Michael Buchanan, a Community Corrections Officer ("CCO") who at the time was assigned to supervise Miller, wrote to Coker:

> "Mr. Miller has submitted the same address (2406 N. Street NE) on previous releases and, upon release, just goes to his girlfriend's house – the NCO victim. As past behavior is the best indicator of future behavior, I would argue this address should not be approved, as it clearly does not present enough of a protective factor for Mr. Miller or his victim/s."

Carney Decl. Ex. 65. Coker responded that because Miller was being supervised on a misdemeanor sentence, he was not required to have an approved address. *Id.* Walner, who was copied on these emails, commented: "I agree that Mr. Miller will eventually try to make contact with the victim." *Id.*

Later in September 2012, Angela Freeland was assigned to be Miller's CCO. On October 16, 2012, one day after his release from prison, Miller reported to Freeland's office. Miller told her he was homeless and was "couch surfing" with relatives. Freeland Decl., ¶15. Because he was under supervision as a misdemeanor domestic violence offender, he was not required to establish an approved address upon release from prison. *Id.*, ¶24. Assuming Miller was homeless, Freeland instructed him on October 16 to report to her weekly. She also gave him a housing/shelter log to keep track of where he was staying. *Id.*, ¶17. Around that time, Freeland called Patricelli and left a message requesting a call back, but Patricelli never returned the call. *Id.* at ¶28. On October 17, 2012, Freeland contacted Coker who informed her that Patricelli had moved to a new residence and knew she should call law enforcement if she saw Miller. *Id.* at ¶18.

On October 23, 2012, Miller reported to Freeland's office as directed. He provided her with a housing/shelter log falsely indicating he was staying with his mother, Leona

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Benson, in Burien. Freeland Decl., ¶17. The form did not list an address but did provide a telephone number. Carney Decl., Ex. 16. Freeland did not call the number to verify that Miller was staying there. Benson has alleged that while she cannot remember if her son stayed with her during this time period, she would have told the truth had she received a call. Supp. Decl. of Benson. On October 29, 2012, Freeland spoke with Benson, who stated that Miller could stay with her. *Id.* at ¶21.

The following day, Miller murdered Patricelli by stabbing her more than twenty times. Cathy Harper, Patricelli's mother, responded to a frantic call from a friend of her daughter's and arrived at Patricelli's apartment within a few minutes and before the police arrived. She was the first to discover Patricelli's bloody, lifeless body. Police found Harper crying hysterically in the apartment, screaming, "she's dead, she's dead, my daughter's dead." Carney Decl. Ex. 12 at 16. Following a CR 35 examination, Harper was diagnosed with "Major Depression, Single Episode, Severe without Psychotic features" by a defense expert. Carney Decl., Ex. 21. Harper told the defense psychiatrist that "[d]aily living with the fact that I found my daughter stabbed to death is an everyday hell. Every time I close my eyes, all I see is my daughter's dead body. I have difficulty sleeping because of seeing her dead body when I close my eyes." *Id.* at 3.

III. DISCUSSION

A. Negligent Supervision

"Parole officers have a duty to protect others from reasonably forseeable dangers engendered by parolees' dangerous propensities." *Taggart v. State*, 118 Wn.2d 195, 217 (1992). However, the DOC does not violate this duty unless its acts or omissions constitute gross negligence. RCW 72.09.320. In *Kelley v. State*, 104 Wn.App. 328 (2000), the issue

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was whether a CCO's failure to discover an offender's violations of conditions of supervision constituted gross negligence, defined as follows:

> Gross negligence is the failure to exercise slight care. But this means not the total absence of care but substantially or appreciably less than the quantum of care inhering in ordinary negligence. It is negligence substantially and appreciably greater than ordinary negligence. Ordinary negligence is the act or omission which a person of ordinary prudence would do or fail to do under like circumstances. There is no issue of gross negligence without evidence of serious negligence.

Id. at 333 (citations and internal quotation marks omitted). If there is substantial evidence of seriously negligent acts or omissions, then the issue of gross negligence should be resolved by the jury. *Nist v. Tudor*, 67 Wn.App. 322, 332 (1965).

The high bar posed by the gross negligence standard is exemplified by the facts in *Kelley*. There, the offender – Inghalls – was on community custody, having been convicted of attempted rape. The CCO's supervision of Ingalls was slipshod. During the eight months of supervision, the CCO made only 14 out of 27 field contacts required by DOC policy. The CCO was on notice that Ingalls may have violated his curfew when he was detained by police outside a junior high school. The CCO also failed to discover that Ingalls violated his curfew when had was arrested for entering an occupied motel room. Eventually, Ingalls assaulted a woman who refused his sexual advances. The court held that the CCO's conduct, while arguably negligent, did not rise to the level of gross negligence and affirmed summary judgment in favor of the State. *Kelley*, 104 Wn.App. at 338.

Like Ingalls, Miller's dangerous propensities were obvious, and he ultimately acted on those dangerous propensities when he killed Patricelli. However, there are some significant differences in the two cases, both in terms of the diligence shown by Freeland in supervising Miller and the fact that Miller's violations of the terms of his sentence were not apparent.

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Unlike the CCO in *Kelley*, Freeland only supervised Miller for 15 days. Under DOC policy, she was required to make three contacts with Miller each month, two of them in the field, and one collateral contact. During the 15 day period, Freeland met with Miller twice at the DOC field office, subjected him to UA's, made numerous collateral contacts, including attempting to reach Patricelli, and monitored his progress toward obtaining a mental health evaluation.

Unlike Ingalls, whose violations of his curfew should have been obvious to his CCO, Miller appeared to be in compliance with the terms of his sentence: he appeared at Freeland's office as directed, his UAs were negative, he was in the process of scheduling a mental health evaluation. Most importantly, there was no indication that he was violating the NCO and living with Patricelli. Between Coker and Freeland, DOC reached out to Patricelli four times in the September/October period to offer their assistance and urging her to call if there were any problems. The last of these calls occurred while Miller was staying with Patricelli. Yet, Patricelli did not ask for help or report Miller's violation of the NCO. Whatever the reasons for Patricelli's reticence, including a loss of faith in DOC's ability to protect her or fear of Miller, the result was the same: Miller's violation of the NCO was not apparent.

Plaintiffs offer a lengthy list of actions DOC could have taken that would have revealed that Miller was staying with Patricelli, including requiring daily instead of weekly reporting, electronic or GPS monitoring, administering polygraphs, reviewing social networking sites, monitoring Miller's phone, conducting home visits and interviewing additional collateral contacts. Stough Decl., ¶ 107. In addition, plaintiffs contend that Freeland was grossly negligent by failing to call Leona Benson on October 23 to verify that Miller was in fact staying with her.

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The court agrees that this more intensive level of supervision would certainly have been desirable, particularly in light of the horrendous outcome. But looking at the circumstances from the perspective of what was known to DOC at the time, including Miller's dangerous propensities, and considering all the steps Freeland and Coker did take, the court concludes that no reasonable jury could find the absence of slight care. This conclusion is compelled by *Kelley*, a case in which the supervision by DOC was less diligent than here, Ingall's violations were far more obvious than Miller's, and yet the court found the absence of gross negligence as a matter of law.

B. Negligent Infliction of Emotional Distress

In Washington, a cause of action for negligent infliction of emotional distress ("NIED") is recognized "where a plaintiff witnesses the victim's injuries at the scene of an accident shortly after it occurs and before there is a material change in the attendant circumstances." *Hegel v. McMahon,* 136 Wn.2d 122, 132 (1998). "In these circumstances, the plaintiff's emotional distress results from the shock caused by the personal experience in the immediate aftermath of an especially horrendous event of seeing the victim, surrounding circumstances, and effects of the accident as it actually occurred." *Colbert v. Moomba Sports, Inc.*, 163 Wn.2d 43, 55 (2008). "A plaintiff cannot recover if he or she did not witness the accident and did not arrive shortly thereafter, meaning he or she did not see the accident or the horrendous attendant circumstances such as bleeding, the victim's cries of pain, and, in some cases, the victim's dying words all of which would constitute a continuation of the event." *Id.*

Here, as plaintiffs points out, "Harper experienced her daughter's injuries at the scene of the attack as vividly as could be imagined without viewing the actual attack." Plaintiffs' Response at 21. She arrived within 7 minutes of the fatal attack. The body had not been

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removed from the scene or disturbed in any way. Patricelli's body was still bleeding when Harper arrived, the shower water was still turned on in the bathroom where Patricelli was stabbed. Photographs of Harper at the scene show her daughter's blood on Harper's hands. *Id.*

The State argues that because Harper did not witness Patricelli's murder or suffering, there is no cause of action for NIED. In *Colbert*, the court held that a father who witnessed his daughter being recovered from a lake three hours after she drowned could not bring an NIED claim:

> When Mr. Colbert arrived, the accident had already occurred – he did not observe his daughter's suffering or her condition while she was drowning. Although he may have arrived within a chronologically short time of her death, at no time did he personally experience conditions that can be said to be a continuation of an especially horrendous event involving conditions analogous to seeing a crushed body or bleeding or hearing cries of pain or dying words.

163 Wn.2d at 55. Here, as in *Colbert*, Harper did not witness her daughter's suffering before she died. However, unlike *Colbert* where the father observed his daughter's body being pulled from the water from a dock approximately 100 yards away several hours after the event, Harper arrived within minutes and beheld and touched her daughter's mutilated and still bleeding body. There can be no question that Harper experienced conditions "that can be said to be a continuation of an especially horrendous event." *Colbert*, 163 Wn.2d at 55.

An additional element of NIED is that the plaintiff must demonstrate objective symptoms of emotional injury. *Gain v. Carroll Mill Co.*, 114 Wn.2d 254, 260 (1990). Harper's diagnosis of "Major Depression, Single Episode, Severe without Psychotic features" readily satisfies this element.

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Negligence, of course, is also an element. While the court has granted summary judgment on the issue of gross negligence, a jury could conclude that DOC's supervision of Miller was negligent and that this negligence proximately caused Harper's emotional distress. The State appears to concede this point. ("A deficient investigation to discover violations, while perhaps negligent, is not gross negligence.") Defendant's Motion at 11.

The State's motion to dismiss the NIED claim is denied.

C. Negligent Release

Plaintiffs claim that DOC released Miller four months early based on an improper calculation of time served on Case No. 511MH0045, a King County District Court case. Yet, according to the undisputed declaration of Arrell Dayton, the Records Supervisor/Manager for DOC, DOC had no sentencing information relating to this misdemeanor sentencing. More importantly, the sentence would not have been served in DOC custody. The only possible calculation error attributable to DOC relates to a violation of his previous supervision. Assuming an error occurred, Miller should have been released eight days later and would have been on community custody on October 30, 2012.

The negligent release claim is dismissed.

IV. CONCLUSION

Plaintiffs' claims for negligent supervision and negligent release are dismissed. The NIED claim may proceed to trial. The parties shall submit an order consistent with this opinion that meets the requirements of CR 56(h).

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SIGNED this 31 day of August 2016.

JUDGE BRUCE E. HELLER

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IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON
IN AND FOR THE COUNTY OF KING

HARPER,

Plaintiffs,

v.

WASHINGTON STATE DEPARTMENT OF CORRECTIONS, a governmental entity

Defendants.

No. 14-2-32600-9 KNT

ORDER GRANTING STATE'S MOTION FOR RECONSIDERATION

The State has moved the court to reconsider its denial of the State's motion for summary judgment with regard to plaintiffs' Negligent Infliction of Emotional Distress (NIED) claim. In its opinion, the court concluded that a jury could find that DOC's supervision of Miller was negligent and that this negligence caused Plaintiff Harper's emotional distress. Id. at 10. This conclusion was erroneous in that it overlooked RCW 72.09.320, which requires a plaintiff to prove gross negligence as a precondition for all civil damages. The statute applies to plaintiff's NIED claim, just as it applies to the negligent supervision claim. Since the court concluded that no reasonable jury could find gross negligence with respect to the negligent supervision claim, the same conclusion must be made for the NIED claim.

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The State's motion for reconsideration is therefore GRANTED and this case is DISMISSED. The current trial date of November 7, 2016 is stricken. The State shall present an Order consistent with this ruling.

Dated: October 12, 2016

JUDGE BRUCE E. HELLER

Judge Bruce E. Heller
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No. 93594-7

SUPREME COURT OF THE STATE OF WASHINGTON

CITY OF SEATTLE,

Petitioner,

v.

DANIEL SCHULTE, et al.,

Respondents.

CERTIFICATE OF SERVICE

I am and at all times hereinafter mentioned was a citizen of the United States, a resident of the State of Washington, over the age of 21 years, competent to be a witness in the above action, and not a party thereto; that on the 27th day of October, 2016 I caused to be served a true copy of the following documents:

1. Petitioner City of Seattle's Notice of Supplemental Authority; and
2. Proof of Service

per the parties' electronic service agreement, upon:

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Defendant (pro se)

I declare under penalty of perjury under the laws of the State of

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Washington that the foregoing is true and correct.

DATED this 27th day of October, 2016.

Katie Dillon

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Subject: RE: City of Seattle v. Schulte: City of Seattle's Notice of Supplemental Authority and Certificate of Service

Received 10-27-16.

Supreme Court Clerk's Office

Please note that any pleading filed as an attachment to e-mail will be treated as the original. Therefore, if a filing is by e-mail attachment, it is not necessary to mail to the court the original of the document.

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Subject: City of Seattle v. Schulte: City of Seattle's Notice of Supplemental Authority and Certificate of Service

On behalf of Paul Lawrence (WSBA No. 13557), attorney for the City of Seattle, attached please find the Petitioner City of Seattle's Notice of Supplemental Authority and Certificate of Service.

Please note that our reception, address suite number and zip code have changed.

Katie Dillon
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