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NO. 94105-0

SUPREME COURT OF THE STATE OF WASHINGTON

LONNIE RAY TRAYLOR,

Appellant,

v.

MOST WORSHIPFUL PRINCE HALL GRAND LODGE F.&A.M. WASHINGTON AND JURISDICTION and MOST WORSHIPFUL GRAND MASTER, GREGORY D. WRAGGS, SR.,

Respondents.

RESPONDENTS' ANSWER TO
PETITION FOR REVIEW

James C. Fowler, WSBA #15560 Attorneys for Respondents

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This Petition for Review should be denied. The Petitioner has ignored RAP 13.4(b), and this case does not meet any of the four circumstances in RAP 13.4(b) under which review will be granted. The decision of the Court of Appeals in this case did not conflict with a decision of the Supreme Court or a published decision of the Court of Appeals. There is no Constitutionally significant question of law in this case. And there is no issue of substantial public interest. The Petitioner was suspended from his social membership in his Masonic Lodge. The Trial Court and the Court of Appeals followed well established case law limiting court interference in fraternal organizations, such as the decision in *Anderson v. Enterprise Lodge No. 2,* 80 Wn.App. 41, 46, 906 P.2d 962 (1995). There is nothing unique or of public interest in this dispute. Consequently, the petition should be denied.

It is impossible to make a well-organized, point-by-point refutation of the Petition because the Petition itself is so disorganized. The Petitioner is a serial pro se litigant and his Petition, like his pleadings to the Trial Court and the Court of Appeals, is a long rambling monologue that is difficult to follow in many places. We do refer the Court to our Amended Brief of Respondents in the Court of Appeals, which does contain an organized statement of facts and legal arguments to the extent the Court has any questions regarding what occurred in this case.

RESPECTFULLY SUBMITTED this 1st day of March, 2017.

VANDEBERG JOHNSON & GANDARA, LLP

Bv

James C. Fowler, WSBA #15560 jfowler@vjgseattle.com

Attorneys for Respondents

I hereby declare under penalty of perjury under the laws of the State of Washington, that the following is true and correct. On this day, I caused to be delivered a true and correct copy of the foregoing Response to Petition for Review, by email and by U.S. Mail, postage prepaid, on:

Lonnie Ray Traylor, Plaintiff Pro Se PO Box 5937 Lacey, WA 98509 traylor48@q.com

SIGNED this 2nd day of March, 2017, at Seattle, Washington.

Lorraine Lofton