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SUPREME COURT  
STATE OF WASHINGTON  
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NO. 97643-1

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**SUPREME COURT OF THE STATE OF WASHINGTON**

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MICHAEL WILLIAMS,

Appellant,

v.

WASHINGTON STATE DEPARTMENT OF CORRECTIONS,

Respondent.

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**ANSWER TO PETITION FOR REVIEW**

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## **I. INTRODUCTION**

Petitioner, Michael Williams, attempted to file multiple briefs in the Court of Appeals, but the court rejected those briefs because they contained no citations to the record. The court has the discretion to reject such non-conforming briefs, which place an additional and undue burden on the court.

The Court of Appeals eventually issued a Conditional Ruling of Dismissal, which provided Mr. Williams one more opportunity to file a conforming brief. Rather than filing a third brief containing citations to the record, however, Mr. Williams moved to modify the Conditional Ruling of Dismissal.

A three Judge panel denied Williams' motion to modify; review of that denial is the lone issue appropriately raised to this Court. This Court should decline to reverse the Court of Appeals' denial of Mr. Williams' motion to modify.

## **II. STATEMENT OF THE CASE**

Petitioner, Michael Williams, first attempted to file his "Opening Brief of Petitioner" under Court of Appeals Cause No. 52395-7-II on March 29, 2019. Appendix (App.) A. But the court did not file Mr. Williams' brief, and instead sent him a letter informing him that his brief did not conform to the requirements of the Rules of Appellate

Procedure. App. B. Among the deficiencies noted by the court was a statement that Mr. Williams' brief "[did] not cite to the record." *Id.* The court gave Mr. Williams until April 15, 2019 to submit and serve a corrected brief. *Id.*

Mr. Williams' next attempt, Opening Brief of Petitioner (Amended), was received by the Court of Appeals on April 15, 2019. App. A. But because Mr. Williams' amended brief was still without citation to the record, the court again refused to file Mr. Williams' brief, and sent him another letter pointing out the deficiencies within his brief, and informing him that he had until May 6, 2019 to submit and serve a corrected brief. App. C. The court later sent Mr. Williams another letter, extending this deadline to May 15, 2019. App. D.

Mr. Williams declined to submit and serve any corrected brief, and so on May 21, 2019 Court Clerk Derek Byrne sent Mr. Williams a letter warning him that sanctions and dismissal would result unless Mr. Williams filed an Opening Brief by June 5, 2019. App. E. Mr. Williams moved the Court of Appeals for more time to file his brief; that motion was rejected because Mr. Williams neglected to serve counsel for the Department of Corrections. App. F. On June 17, 2019, the court's Commissioner issued a conditional ruling of dismissal, noting that "it appears dismissal is

warranted, but that a brief grace period is also warranted,” and providing Mr. Williams until June 24, 2019, to file his Opening Brief. App. G.

Rather than attempting to file an Opening Brief, Mr. Williams moved to modify the Commissioner’s June 17, 2019 ruling; this motion was denied by a panel of three judges. App. H. Mr. Williams then moved to modify the denial of his prior motion to modify, which the Court of Appeals forwarded to this Court for consideration. App. I.

This Court provided Mr. Williams the opportunity to file a new brief in light of the transfer, which he did, and which this Court has indicated it will treat as a Petition for Review. App. J.

### **III. STANDARD OF REVIEW**

The Supreme Court will accept review of a Petition for Review only if the decision below conflicts with a decision of the Supreme Court or a published decision of the Court of Appeals, or if the case raises significant questions of constitutional law, or involves issues of substantial public interest. RAP 13.4(b).

### **IV. ARGUMENT**

#### **A. The Court of Appeals Acted Within Its Discretion When It Declined to Accept Mr. Williams’ Non-Conforming Briefs and Conditioned His Right to Participate Further In Review on the Terms of Its Rulings**

Rule of Appellate Procedure 10.3(a) sets forth the requisite “Content of Brief” for an appellant. Among these mandates is one that requires each

factual statement to be supported by reference to the record. RAP 10.3(a)(5). An appellate court may strike from the record briefs which fail to comply with these requirements. RAP 10.7; *Edwards v. Edwards*, 99 Wn.2d 913, 915 n.1, 665 P.2d 883 (1983). An appellate court may also levy sanctions upon an appellant who fails to comply with these rules, and may condition participation in review upon compliance with the terms of its rulings. RAP 18.9(a). Rule of Appellate Procedure 18.9(b) further authorizes dismissal of a case on a Commissioner's or Clerk's own motion. RAP 18.9(b).

Here, the briefs Mr. Williams submitted to the Court of Appeals were stricken on two occasions because they did not comply with the Rules of Appellate Procedure. App. B; App. D. In particular, and on each occasion, the Court Clerk took issue with the fact that Mr. Williams did not cite to the record, as required by RAP 10.3(a)(5). App. B; App. D. Mr. Williams does not argue that his briefs did contain citations to the record, but instead argues that he “substantially complied” with the court rules, and provided the court, via exhibits, with all the information “necessary for a panel of judges to come to a ruling on the merits.” Petitioner's Motion for Discretionary Review at 8–9 (¶¶ 4.21, 4.23).

But the requirement for such cites is not a mere formality - briefs which fail to cite to the record can “[waste] the time of opposing counsel

and [hamper] the work of the court.” *Hurlbert v. Gordon*, 64 Wn. App. 386, 401, 824 P.2d 1238, *review denied*, 119 Wn.2d 1015, 833 P.2d 1389 (1992); *See also Litho Color, Inc. v. Pacific Emp’rs Ins. Co.*, 98 Wn. App. 286, 306, 991 P.2d 638 (1999) (“failures to comply with the rules of appellate procedure exacts a heavy and unwarranted toll on the court's resources.”); *See also Lawson v. Boeing Co.*, 58 Wn. App. 261, 271, 792 P.2d 545 (1990) (“The failure to cite to the record is not a formality. It places an unacceptable burden on opposing counsel and on this court.”).<sup>1</sup>

It was within the Court of Appeal’s discretion to strike from the record Mr. Williams’ briefs, which did not cite to the record. RAP 10.3(a)(5); RAP 10.7; *Edwards*, 99 Wn.2d at 915 n.1. There is nothing here to suggest that the court exercised that discretion in a manner which was “manifestly unreasonable or based on untenable grounds.” *Gilmore v. Jefferson Cty. Pub. Transp. Benefit Area*, 190 Wn.2d 483, 494, 415 P.3d 212 (2018) (citations omitted) (reciting standard for abuse of discretion).

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<sup>1</sup> These cases did all involve counsel, and Mr. Williams is litigating pro se. But Mr. Williams’ pro se status and asserted “substantial compliance” with the rules should not entitle him to exception because pro se litigants in Washington State are bound by the same rules of procedure and substantive law as attorneys. *Patterson v. Superintendent of Pub. Instruction*, 76 Wn. App. 666, 671, 887 P.2d 411 (1994) (citing *In re Marriage of Olson*, 69 Wn. App. 621, 626, 850 P.2d 527 (1993)), *review denied*, 126 Wn.2d 1018, 894 P.2d 564 (1995); *see also Edwards v. Le Duc*, 157 Wn. App. 455, 460, 238 P.3d 1187 (2010) (citation omitted) (Trial court “must hold pro se parties to the same standards to which it holds attorneys.”).



This Court should therefore decline to reverse the Court of Appeals' denial of Mr. Williams' motion to modify.

**V. CONCLUSION**

The Department respectfully requests that the Court deny Mr. Williams' Petition for Review.

RESPECTFULLY SUBMITTED this 1st day of November 2019.

ROBERT W. FERGUSON  
Attorney General

s/ Marko L. Pavela  
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**CERTIFICATE OF SERVICE**

I certify that on the date below I caused to be electronically filed the ANSWER TO PETITION FOR REVIEW with the Clerk of the Court using the electronic filing system and that I have mailed by United States Postal Service the document to the following non electronic filing participant:

MICHAEL WILLIAMS, DOC #882945  
COYOTE RIDGE CORRECTIONS CENTER  
PO BOX 769  
CONNELL, WA 99326-0769

I certify under penalty of perjury under the laws of the state of Washington that the foregoing is true and correct.

EXECUTED this 1st day of November 2019, at Olympia, WA.

s/ Beverly Cox  
BEVERLY COX  
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VI. APPENDIX

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## Appellate Court Case Summary

## About Dockets

**Case Number:** 523957  
**Filing Date:** 08-07-2018  
**Coa, Division II**

Event Date	Event Description	Action
08-07-18	Affidavit of Service	Filed
08-07-18	Notice of Appeal	Filed
08-09-18	Case Received and Pending	Status Changed
08-13-18	Other filing	Filed
09-24-18	Statement of Arrangements	Filed
09-24-18	Designation of Clerks Papers	Filed
09-28-18	Letter	Received by Court
10-01-18	Clerk's Papers	Received by Court
11-29-18	Motion to Dismiss (fail to Pay Filg fee)	Filed
11-29-18	Order on Motions	Filed
11-29-18	Letter	Filed
12-10-18	Filing fee	Filed
12-10-18	Letter	Received by Court
12-11-18	Perfection Letter	Filed
01-15-19	Court's Mot for Sanct for Fail to file	Filed
01-15-19	Letter of Sanctions	Filed
01-25-19	Letter	Filed
01-28-19	Letter	Filed
02-01-19	Letter	Sent by Court
02-07-19	Letter	Sent by Court
02-12-19	E-mail	Filed
02-13-19	Report of Proceedings	Filed
02-14-19	Report of Proceedings	Received by Court
02-14-19	Letter	Received by Court
03-29-19	Appellants brief	Information - not filed
04-03-19	Letter	Filed
04-15-19	Appellants brief	Information - not filed
04-19-19	Letter	Filed
04-29-19	Letter	Filed
05-21-19	Court's Mot for Sanct for Fail to file	Filed
05-21-19	Letter of Sanctions	Filed
05-31-19	Motion to Extend Time to File	Filed
06-04-19	Letter	Sent by Court
06-05-19	Appellants brief	Not filed

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 253-593-2806[Fax]  
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06-14-19	Court's Mot for Sanct for Fail to file	Filed
06-14-19	Ruling on Motions	Filed
06-17-19	Ruling on Motions	Filed
07-18-19	Letter	Sent by Court
07-18-19	Motion to Modify Ruling	Filed
07-24-19	Response to motion	Filed
07-31-19	Reply to Response	Information - not filed
08-09-19	Letter	Sent by Court
08-20-19	Order on Motions	Filed
09-10-19	Motion to Modify Ruling	Filed
10-21-19	Petition for Review	Received by Court
12-09-19	Check case Information	Due

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**Can I find the outcome of a case on this website?**  
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**How do I verify the information contained in the search results?**  
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S2

# APPENDIX B





# Washington State Court of Appeals Division Two

950 Broadway, Suite 300, Tacoma, Washington 98402-4454

Derek Byrne, Clerk/Administrator (253) 593-2970 (253) 593-2806 (Fax)

General Orders, Calendar Dates, and General Information at <http://www.courts.wa.gov/courts> **OFFICE HOURS:** 9-12, 1-4.

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April 3, 2019

Michael W. Williams  
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PO Box 769  
Connell, WA 99326-0769

Marko L. Pavela  
Office of the Attorney General  
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**CASE #: 52395-7-II: Michael W. Williams v. WA State Dept. of Corrections**  
**Case Manager: Jodie**

Dear Mr. Williams

The brief you submitted to this court in this matter does not conform to the content and form requirements set out in the Rules of Appellate Procedure for one or more of the following reasons:

- Title Page is not formatted correctly. See sample brief.
- Table of Contents and Table of Authorities is missing. See RAP 10.3 (2).
- Headings are out of order. See RAP 10.3 (3)(4)(5)(6)(7).
- Brief does not cite to the record. RAP 10.3(a)(5).

The Court will not file the brief as part of the official record but will stamp it and place it in the pouch without filing. Therefore, you must submit and re-serve a corrected brief by **April 15, 2019**.

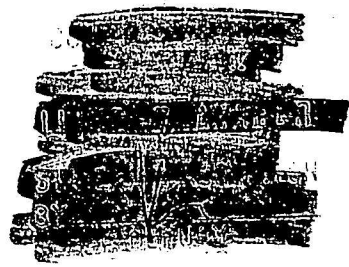
If you have any questions, please contact this office.

Very truly yours,

Derek M. Byrne  
Court Clerk

DMB:jlt

No. [REDACTED]



COURT OF APPEALS,  
DIVISION II  
OF THE STATE OF WASHINGTON

---

[REDACTED], Appellant Petitioner,

v.

[REDACTED] Respondent

---

BRIEF OF [REDACTED]

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**A. Assignments of error**

**Assignments of Error**

1. The trial court erred in denying the relocation of the child with the mother when it did not apply the presumption that the relocation would be allowed under RCW 26.09.520
2. The trial court erred in denying relocation when any harm done by the relocation would be nothing more than mere normal distress suffered due to the logistics of a move.

**Issues Pertaining to Assignments of Error**

Whether the trial court abused its discretion in not applying the presumption that relocation will be granted under RCW 26.09.520 when the court finds that the factor weighs neither for nor against relocation?

Whether the trial court abused its discretion in denying relocation when it did not find that any harm done by the relocation would be more than normal distress suffered due to travel, infrequent contact of a parent, or other hardships which predictably result from dissolution of marriage?

**B. Statement of the Case**

On May 25, 2009, the Petitioner served the Respondent with her Notice of Intended Relocation. CP 2. The Petitioner made her decision to relocate herself and her child based on the several factors. RP 54 – 59. One, her current husband, [REDACTED] was having a difficult time finding employment in Washington due to the economy and ability to transfer his Paramedic license from Kentucky to Washington. RP 55. [REDACTED] did everything he could to obtain the necessary credentials in

Washington; however, the requirements are difficult to fulfill for an individual not trained in Washington. RP 55. Due to the financial difficulties that occurring as a result of [REDACTED]'s inability to find adequate and lasting employment in Washington, moving to Kentucky was the better financially sustainable option. RP 55. [REDACTED] had employment opportunities available to him in Kentucky, not in Washington. RP 55. In addition, the Petitioner had employment opportunities available to her in Kentucky, which would have put them in a financially secure situation that they could not obtain in Washington. RP 55.

In addition, [REDACTED] has parent's who are in poor health and need to assistance taking care of themselves and their 250 acre farm land. RP 57. Even though [REDACTED] has other family members that are available in Kentucky, [REDACTED] has always been the primary care taker. RP 58.

These two factors were the driving force in the Petitioner's decision to relocate her child and current husband to Kentucky. RP 54 – 59. The Petitioner has always been the primary caretaker for her daughter, who suffers from ADHD. RP 36.

On June 26, 2009, the Respondent filed his objection. CP 1. On November 19 and 20, 2009, the trial was held, which resulted in the court denying the relocation. CP 292 – 299. The court found that four factors weighed in favor of the Respondent and the remaining six factors weighed neither for nor against the relocation. RP 176 – 182.

### C. Argument

In most cases, a trial court's rulings on the provisions of a parenting plan are reviewed for abuse of discretion. *In re the marriage of Horner*, 151 Wash.2d 884,893, 93

P.3d 124 (2004). "Abuse of discretion occurs 'when the trial court's decision is manifestly unreasonable or based upon untenable grounds or reasons.'" *Id.*

RCW 26.09.520 allows the residential parent a rebuttable presumption that a relocation will be allow. The non-relocating parent has the burden to 1) timely object to the relocation and 2) rebut the presumption by demonstrating that the detrimental effect of the relocation outweighs the benefit of the change to the child and the relocating parent". *Id.* The statue provides eleven factors for the court to determine at trial whether a relocation would have a detrimental effect on the child. In this case only the first ten factors are relevant because the eleventh factor only applies to temporary orders. *Id.* The legislature did not weight the relocation factors, but this does not preclude a court from focusing on factors that are more relevant in a given case." *Marriage of Pennamen*, 135 Wn. App. 790, 804, 146 P.3rd 466 (2006). The court is required to enter findings on each factor or, in absences of written findings, orally articulate the determinations of each factor.

THE TRIAL COURT ERRED IN DENYING THE RELOCATION OF THE CHILD WITH THE MOTHER WHEN IT DID NOT APPLY THE PRESUMPTION THAT RELOCATION WOULD BE ALLOWE UNDER RCW 26.09.520

The trial court did not apply the presumption granted to the relocating parent under RCW 26.09.520 to factors that weighed neither for nor against the relocation.

The court is not precluded from focusing on factors that are more relevant in a given case. *Marriage of Pennamenn*, at 804. The legislative intent of the factors was to give each fact equal weight and to require the court to make the determinations of each factors weight in ruling for or against a relocation. *See* RCW 26.09.520. However, the lack of weight initially given to the factors does not remove the presumption that allows

relocation. The statute specifically states that the detrimental effect must outweigh the benefits of the relocation based on factors provided by the statute. *Id.* The court's decision about whether the detrimental effects of relocation outweigh the benefits to the children and the relocating parent is inherently subjective. *Marriage of Pennamenn*, at 802.

In this case, the court concluded that four of the ten factors weighed against the relocation. RP 176 - 182. One of the four factors was found to be only slightly in favor of denying the relocation. RP 177. The remaining six factors were found to be neither for nor against the relocation. RP 177 - 182. The Petitioner argues that since all the factors standing without weight generally determine that the presumption should be applied, the factors that are found to be neutral should be determined with the same effect. Therefore, in this case, the court found that six of the factors were neutral, which should be interpreted as favoring the presumption. With the presumption applied to the six factors the court would have no other choice but to allow relocation as there would be more factors in favor of relocation as opposed to against relocation. Simply stating that a factor does not weigh neither for nor against relocation does not negate nor remove that factor from the analysis of whether relocation should be granted.

THE TRIAL COURT ERRED IN DENYING RELOCATION WHEN ANY HARM DONE BY THE RELOCATION WOULD BE NOTHING MORE THAN MERE NORMAL DISTRESS SUFFERED DUE TO THE LOGISTICS OF A MOVE.

Any harm done by allowing the relocation of the child would only be the normal harm cause by any move.

The court may not prohibit a parent from relocating a child unless the relocation would cause harm to the child. *In re the marriage of Littlefield*, 133 Wash.2d 39, 55, 940



P.2d 1362 (1997). The statute requires “more than the normal distress suffered by a child because of travel, infrequent contact of a parent, or other hardships which predictably result from a dissolution of marriage.” *Id.*

In *Littlefield*, the mother moved from Washington to California. She was the primary residential parent of the child. After moving to California, the mother was ordered to return to Washington upon recommendation of an appointed psychologist/parenting evaluator. It appears that this was to help maintain the relationship between the child and her father. *Id at 45.*

In the present case, the Court deny relocation stating that the ruling was made from the child’s perspective. RP 175. The Court also states that disrupting contact between the child and her mother would be more detrimental than disrupting contact between the child and her father. RP 177 – 178. In addition, the Court states “ I find [REDACTED] of an age and developmental stage where relocation would negatively affect her emotional and psychological development because it would result in significantly reduced contact with [REDACTED] would reduce contact with [REDACTED]’s extended family, and ...would remove her to a locale where she has no other connections other than her mother and her step-father.” RP 179. The Court does not state anywhere in its ruling that this would be beyond the normal distress of any relocation for the child.

“The trial court does not have the responsibility or the authority or the ability to create ideal circumstances for the family. Instead, it must make parenting plan decision which are based on the actual circumstances of the parents and of the children as they exist at the time of the trial.” *In re the marriage of Littlefield*, 133 Wash.2d 39,57, 940 P.2d 1362 (1997). In the present case the Court attempted to craft a parenting situation,

in opposition of the best interests of the child. The court had testimony that the now-husband of the child's mother was unemployed and had been for some time. RP 54. The court had testimony that the mother had been unemployed and had employment waiting for her in Kentucky. RP 55. The Court also had knowledge that the mother had leased out her home with the intention of relocating. RP 181. Contrary to looking at the actual situation of the parents, the Court made an attempt to create an "ideal situation" for the child by denying the relocation. This decision, in turn created a situation, which, in fact, created more distress for the child and relocating parent, by putting the family in financial crisis. The Court failed to look at the reality of the situation.

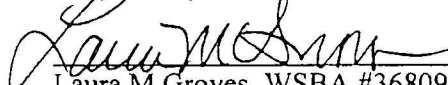
This is a situation where the distress caused by the move would have been less than the distress caused by staying in a financially critical situation. The denial of relocation is more detrimental than not allowing the relocation and [REDACTED] the father, did not meet his burden of rebutting the presumption that relocation would be allowed.

**D. Conclusion**

For the reasons set forth above the Appellant respectfully requests that the Court reverse the trial court's ruling and allow relocation.

March 4, 2011

Respectfully submitted,

  
\_\_\_\_\_  
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Attorney for Appellant Petitioner

9

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DIVISION II  
11 MAR 18 PM 10:30  
STATE OF WASHINGTON  
BY \_\_\_\_\_  
DEPUTY.

COURT OF APPEALS, DIVISION II  
OF THE STATE OF WASHINGTON

In re:

[Redacted]

Appellant

No. 41140-7 II  
Declaration of Mailing  
(DCLRM)

Vs

[Redacted]

Respondent

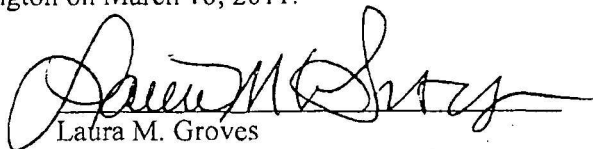
I, LAURA M. GROVES, declare that I am at least 18 years of age and not a party to this action and:

On March 18, 2011 I deposited into the U.S. Mail, first class, postage prepaid, a copy of the following documents:

- Appellant Brief
- Copy of Transcripts from Trial

I certify (or declare) under penalty of perjury under the laws of the state of Washington that the foregoing is true and correct.

Signed at Seattle, Washington on March 18, 2011.

  
Laura M. Groves

**Declaration of Mailing**

1

**Jones, Amy (ATG)**

---

**From:** Pavela, Marko L. (ATG)  
**Sent:** Wednesday, April 03, 2019 9:28 AM  
**To:** ATG MI COR Oly CE Reader; ATG MI COR OLY LA EF  
**Subject:** FW: D2 523957--MICHAEL W. WILLIAMS, APPELLANT V. WASHINGTON STATE DEPARTMENT OF CORRECTIONS, RESPONDENT--Letter  
**Attachments:** MICHAEL W. WILLIAMS, APPELLANT V. WASHINGTON STATE DEPARTMENT OF CORRECTIONS, RESPONDENT.pdf; Sample Civil App Brief (002).pdf  
**Importance:** High

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**From:** Thompson, Jodie  
**Sent:** Wednesday, April 3, 2019 9:27:52 AM (UTC-08:00) Pacific Time (US & Canada)  
**To:** Pavela, Marko L. (ATG); ATG MI COR Oly CE Reader  
**Subject:** D2 523957--MICHAEL W. WILLIAMS, APPELLANT V. WASHINGTON STATE DEPARTMENT OF CORRECTIONS, RESPONDENT--Letter

**Office Hours**

**9:00 am to 12:00 pm**

**1:00 pm to 4:00 pm**

**You may file documents electronically as provided below. Briefs are considered filed as of the postmark date. RAP 18.6(c). Briefs may only be filed electronically through the portal website. Close of business remains 5 pm .**

To Counsel and Interested Parties:

Attached is a Letter filed today, 4/3/2019.

This will be the only notice you will receive from the court.

The court requests that motions and other correspondence be sent via the Washington State Appellate Courts' Portal. In order to use the portal to file with the courts, you will first need to register and set up a free account at <https://ac.courts.wa.gov>. If you have difficulty accessing the new portal, please contact the Administrative Office for the Courts at 800-442-2169. When filing electronically, please do NOT follow up with a paper copy.

Please contact the court at (253) 593-2970 or [coa2@courts.wa.gov](mailto:coa2@courts.wa.gov) if you have any questions or comments.

Thank you.

Jodie L. Thompson  
Case Manager

# APPENDIX C



# Washington State Court of Appeals Division Two

950 Broadway, Suite 300, Tacoma, Washington 98402-4454

Derek Byrne, Clerk/Administrator (253) 593-2970 (253) 593-2806 (Fax)

General Orders, Calendar Dates, and General Information at <http://www.courts.wa.gov/courts> **OFFICE HOURS:** 9-12, 1-4.

---

April 19, 2019

Marko L. Pavela  
Office of the Attorney General  
1125 Washington St SE  
PO Box 40116  
Olympia, WA 98504-0116  
markop@atg.wa.gov

Michael W. Williams  
DOC#882945  
Coyote Ridge Corrections Center  
PO Box 769  
Connell, WA 99326-0769

**CASE #: 52395-7-II: Michael W. Williams v. Washington State Department of  
Corrections  
Case Manager: Jodie**

Dear Mr. Williams

The brief you submitted to this Court in this matter does not conform to the content and form requirements set out in the Rules of Appellate Procedure for one or more of the following reasons:

- Brief does not cite to the record. RAP 10.3(a)(5).
- Title of the brief should be Opening Brief of Appellant.
- No proof of service.

The Court will not file the brief as part of the official record but will stamp it and place it in the pouch without filing. Therefore, you must submit and re-serve a corrected brief by **May 6, 2019**.

If you have any questions, please contact this office.

Very truly yours,

Derek M. Byrne  
Court Clerk

DMB:jlt

## Jones, Amy (ATG)

---

**From:** Pavela, Marko L. (ATG)  
**Sent:** Friday, April 19, 2019 3:42 PM  
**To:** ATG MI COR Oly CE Reader; ATG MI COR OLY LA EF  
**Subject:** FW: D2 523957--MICHAEL W. WILLIAMS, APPELLANT V. WASHINGTON STATE DEPARTMENT OF CORRECTIONS, RESPONDENT--Letter  
**Attachments:** MICHAEL W. WILLIAMS, APPELLANT V. WASHINGTON STATE DEPARTMENT OF CORRECTIONS, RESPONDENT.pdf  
**Importance:** High

---

**From:** Thompson, Jodie  
**Sent:** Friday, April 19, 2019 3:12:18 PM (UTC-08:00) Pacific Time (US & Canada)  
**To:** Pavela, Marko L. (ATG); ATG MI COR Oly CE Reader  
**Subject:** D2 523957--MICHAEL W. WILLIAMS, APPELLANT V. WASHINGTON STATE DEPARTMENT OF CORRECTIONS, RESPONDENT--Letter

To Counsel and Interested Parties:

Attached is a Letter filed today, 4/19/2019.

This will be the only notice you will receive from the court.

The court requests that motions and other correspondence be sent via the Washington State Appellate Courts' Portal. In order to use the portal to file with the courts, you will first need to register and set up a free account at <https://ac.courts.wa.gov>. If you have difficulty accessing the new portal, please contact the Administrative Office for the Courts at 800-442-2169. When filing electronically, please do NOT follow up with a paper copy.

Please contact the court at (253) 593-2970 or [coa2@courts.wa.gov](mailto:coa2@courts.wa.gov) if you have any questions or comments.

Thank you.

Jodie L. Thompson  
Case Manager

# APPENDIX D





# Washington State Court of Appeals Division Two

950 Broadway, Suite 300, Tacoma, Washington 98402-4454

Derek Byrne, Clerk/Administrator (253) 593-2970 (253) 593-2806 (Fax)

General Orders, Calendar Dates, and General Information at <http://www.courts.wa.gov/courts> **OFFICE HOURS:** 9-12, 1-4.

---

April 30, 2019

Marko L. Pavela  
Office of the Attorney General  
1125 Washington St SE  
PO Box 40116  
Olympia, WA 98504-0116  
markop@atg.wa.gov

Michael W. Williams  
DOC#882945  
Coyote Ridge Corrections Center  
PO Box 769  
Connell, WA 99326-0769

**CASE #: 52395-7-II: Michael W. Williams v. Washington State Department of  
Corrections  
Case Manager: Jodie**

Mr. Williams

The brief you submitted to this Court in this matter does not conform to the content and form requirements set out in the Rules of Appellate Procedure for one or more of the following reasons:

- Brief does not cite to the record. RAP 10.3(a)(5).
- Title of the brief should be Opening Brief of Appellant.
- There is no proof of service to Washington State Department of Corrections.

The Court will not file the brief as part of the official record but will stamp it and place it in the pouch without filing. Therefore, you must submit and re-serve a corrected brief by **May 15, 2019**.

Please see the enclosed sample brief for reference.

If you have any questions, please contact this office.

Very truly yours,

Derek M. Byrne  
Court Clerk

DMB;jlt

## Jones, Amy (ATG)

---

**From:** Pavela, Marko L. (ATG)  
**Sent:** Tuesday, April 30, 2019 9:01 AM  
**To:** ATG MI COR Oly CE Reader; ATG MI COR OLY LA EF  
**Subject:** FW: D2 523957--MICHAEL W. WILLIAMS, APPELLANT V. WASHINGTON STATE DEPARTMENT OF CORRECTIONS, RESPONDENT--Letter  
**Attachments:** MICHAEL W. WILLIAMS, APPELLANT V. WASHINGTON STATE DEPARTMENT OF CORRECTIONS, RESPONDENT.pdf  
**Importance:** High

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**From:** Thompson, Jodie  
**Sent:** Tuesday, April 30, 2019 9:00:20 AM (UTC-08:00) Pacific Time (US & Canada)  
**To:** Pavela, Marko L. (ATG); ATG MI COR Oly CE Reader  
**Subject:** D2 523957--MICHAEL W. WILLIAMS, APPELLANT V. WASHINGTON STATE DEPARTMENT OF CORRECTIONS, RESPONDENT--Letter

To Counsel and Interested Parties:

Attached is a Letter filed today, 4/30/2019.

This will be the only notice you will receive from the court.

The court requests that motions and other correspondence be sent via the Washington State Appellate Courts' Portal. In order to use the portal to file with the courts, you will first need to register and set up a free account at <https://ac.courts.wa.gov>. If you have difficulty accessing the new portal, please contact the Administrative Office for the Courts at 800-442-2169. When filing electronically, please do NOT follow up with a paper copy.

Please contact the court at (253) 593-2970 or [coa2@courts.wa.gov](mailto:coa2@courts.wa.gov) if you have any questions or comments.

Thank you.

Jodie L. Thompson  
Case Manager

# APPENDIX E



# Washington State Court of Appeals Division Two

950 Broadway, Suite 300, Tacoma, Washington 98402-4454

Derek Byrne, Clerk/Administrator (253) 593-2970 (253) 593-2806 (Fax)

General Orders, Calendar Dates, and General Information at <http://www.courts.wa.gov/courts> **OFFICE HOURS:** 9-12, 1-4.

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May 21, 2019

Marko L. Pavela  
Office of the Attorney General  
1125 Washington St SE  
PO Box 40116  
Olympia, WA 98504-0116  
markop@atg.wa.gov

Michael W. Williams  
DOC#882945  
Coyote Ridge Corrections Center  
PO Box 769  
Connell, WA 99326-0769

**CASE #: 52395-7-II: Michael W. Williams v. WA State Dept of Corrections  
Case Manager: Jodie**

Mr. Williams:

Our records indicate you have failed to timely perfect the above-referenced appeal by not filing the Appellant's Opening Brief due May 15, 2019.

Accordingly, we will impose a sanction of \$200 against you unless you file the Appellant's Opening Brief with this Court on or before fifteen days from the date of this letter. If you do not, a check for the amount of the sanction, payable to the State of Washington, will be due. Once a sanction becomes due, we will accept no further filings from you until you pay that sanction in full.

Further, we have scheduled a Motion for Dismissal and/or Further Sanctions because of your failure to timely file the Appellant's Opening Brief. A Commissioner will consider this motion, without oral argument, if you do not file the Appellant's Opening Brief by June 5, 2019. We will strike the Clerk's motion if you cure the defect before that date. Please note, however, that even if we strike the Clerk's motion, you will not be released from paying the sanction imposed on June 5, 2019, unless you file your response before that date.

Very truly yours,

Derek M. Byrne  
Court Clerk

DMB:jlt

## Jones, Amy (ATG)

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**From:** Pavela, Marko L. (ATG)  
**Sent:** Tuesday, May 21, 2019 9:03 AM  
**To:** ATG MI COR Oly CE Reader; ATG MI COR OLY LA EF  
**Subject:** FW: D2 523957--MICHAEL W. WILLIAMS, APPELLANT V. WASHINGTON STATE DEPARTMENT OF CORRECTIONS, RESPONDENT--Letter  
**Attachments:** MICHAEL W. WILLIAMS, APPELLANT V. WASHINGTON STATE DEPARTMENT OF CORRECTIONS, RESPONDENT.pdf  
**Importance:** High

---

**From:** Thompson, Jodie  
**Sent:** Tuesday, May 21, 2019 9:02:47 AM (UTC-08:00) Pacific Time (US & Canada)  
**To:** Pavela, Marko L. (ATG); ATG MI COR Oly CE Reader  
**Subject:** D2 523957--MICHAEL W. WILLIAMS, APPELLANT V. WASHINGTON STATE DEPARTMENT OF CORRECTIONS, RESPONDENT--Letter

To Counsel and Interested Parties:

Attached is a Sanction Letter filed today, 5/21/2019.

This will be the only notice you will receive from the court.

The court requests that motions and other correspondence be sent via the Washington State Appellate Courts' Portal. In order to use the portal to file with the courts, you will first need to register and set up a free account at <https://ac.courts.wa.gov>. If you have difficulty accessing the new portal, please contact the Administrative Office for the Courts at 800-442-2169. When filing electronically, please do NOT follow up with a paper copy.

Please contact the court at (253) 593-2970 or [coa2@courts.wa.gov](mailto:coa2@courts.wa.gov) if you have any questions or comments.

Thank you.

Jodie L. Thompson  
Case Manager

# APPENDIX F



# Washington State Court of Appeals Division Two

950 Broadway, Suite 300, Tacoma, Washington 98402-4454

Derek Byrne, Clerk/Administrator (253) 593-2970 (253) 593-2806 (Fax)

General Orders, Calendar Dates, and General Information at <http://www.courts.wa.gov/courts> **OFFICE HOURS:** 9-12, 1-4.

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June 4, 2019

Marko L. Pavela  
Office of the Attorney General  
1125 Washington St SE  
PO Box 40116  
Olympia, WA 98504-0116  
markop@atg.wa.gov

Michael W. Williams  
DOC#882945  
Coyote Ridge Corrections Center  
PO Box 769  
Connell, WA 99326-0769

**CASE #: 52395-7-II: Michael W. Williams v. WA State Dept of Corrections**  
**Case Manager: Jodie**

Dear Mr. Williams

This Court is in receipt of your Motion to Extend Time to file your brief until June 20, 2019. Due to no proof of service on Marko L. Pavela, Attorney for Washington State Department of Corrections, this motion is being placed in the file with no action taken.

Very truly yours,

A handwritten signature in black ink, appearing to be "Derek M. Byrne", is written over a horizontal line.

Derek M. Byrne  
Court Clerk

DMB:jlt

## Jones, Amy (ATG)

---

**From:** Pavela, Marko L. (ATG)  
**Sent:** Tuesday, June 04, 2019 11:18 AM  
**To:** ATG MI COR Oly CE Reader; ATG MI COR OLY LA EF  
**Subject:** FW: D2 523957--MICHAEL W. WILLIAMS, APPELLANT V. WASHINGTON STATE DEPARTMENT OF CORRECTIONS, RESPONDENT--Letter  
**Attachments:** MICHAEL W. WILLIAMS, APPELLANT V. WASHINGTON STATE DEPARTMENT OF CORRECTIONS, RESPONDENT.pdf  
**Importance:** High

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**From:** Thompson, Jodie  
**Sent:** Tuesday, June 4, 2019 10:38:40 AM (UTC-08:00) Pacific Time (US & Canada)  
**To:** Pavela, Marko L. (ATG); ATG MI COR Oly CE Reader  
**Subject:** D2 523957--MICHAEL W. WILLIAMS, APPELLANT V. WASHINGTON STATE DEPARTMENT OF CORRECTIONS, RESPONDENT--Letter

To Counsel and Interested Parties:

Attached is a Letter filed today, 6/4/2019.

This will be the only notice you will receive from the court.

The court requests that motions and other correspondence be sent via the Washington State Appellate Courts' Portal. In order to use the portal to file with the courts, you will first need to register and set up a free account at <https://ac.courts.wa.gov>. If you have difficulty accessing the new portal, please contact the Administrative Office for the Courts at 800-442-2169. When filing electronically, please do NOT follow up with a paper copy.

Please contact the court at (253) 593-2970 or [coa2@courts.wa.gov](mailto:coa2@courts.wa.gov) if you have any questions or comments.

Thank you.

Jodie L. Thompson  
Case Manager



# APPENDIX G

FILED  
COURT OF APPEALS  
DIVISION II

2019 JUN 17 PM 3:00

STATE OF WASHINGTON

BY JH  
DEPUTY

# IN THE COURT OF APPEALS OF THE STATE OF WASHINGTON

## DIVISION II

MICHAEL W. WILLIAMS,  
Appellant,

v.

WASHINGTON STATE  
DEPARTMENT OF  
CORRECTIONS,

Respondent.

No. 52395-7-II

CONDITIONAL RULING OF DISMISSAL

**THIS MATTER** comes before the undersigned upon a motion by the Clerk of this Court to dismiss the above-entitled appeal for failure to file the Appellant's Opening Brief, due since June 5, 2019. It appears that dismissal is warranted, but that a brief grace period is also warranted. Accordingly, it is

**ORDERED** that the above-entitled Appeal will be dismissed without further notice unless the Appellant's Opening Brief and any previously imposed sanctions are on file with the Clerk before the close of business on June 24, 2019.

DATED this 17<sup>th</sup> day of June, 2019.

  
COURT COMMISSIONER

Marko L. Pavela  
Office of the Attorney General  
1125 Washington St SE  
PO Box 40116  
Olympia, WA 98504-0116  
markop@atg.wa.gov

Michael W. Williams  
DOC#882945  
Coyote Ridge Corrections Center  
PO Box 769  
Connell, WA 99326-0769

**Jones, Amy (ATG)**

---

**From:** Pavela, Marko L. (ATG)  
**Sent:** Monday, June 17, 2019 3:09 PM  
**To:** ATG MI COR Oly CE Reader; ATG MI COR OLY LA EF  
**Subject:** FW: D2 523957--MICHAEL W. WILLIAMS, APPELLANT V. WASHINGTON STATE DEPARTMENT OF CORRECTIONS, RESPONDENT--Ruling  
**Attachments:** - - 523957 - Public - Ruling - Motion - 6-17-2019 - - Conditional Ruling of Dismissal - Schmidt, Eric.PDF  
**Importance:** High

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**From:** Thompson, Jodie  
**Sent:** Monday, June 17, 2019 3:09:03 PM (UTC-08:00) Pacific Time (US & Canada)  
**To:** Pavela, Marko L. (ATG); ATG MI COR Oly CE Reader  
**Subject:** D2 523957--MICHAEL W. WILLIAMS, APPELLANT V. WASHINGTON STATE DEPARTMENT OF CORRECTIONS, RESPONDENT--Ruling

**Office Hours**

**9:00 am to 12:00 pm**

**1:00 pm to 4:00 pm**

**You may file documents electronically as provided below. Briefs are considered filed as of the postmark date. RAP 18.6(c). Briefs may only be filed electronically through the portal website. Close of business remains 5 pm .**

To Counsel and Interested Parties:

Attached is a Ruling filed today, 6/17/2019.

This will be the only notice you will receive from the court.

The court requests that motions and other correspondence be sent via the Washington State Appellate Courts' Portal. In order to use the portal to file with the courts, you will first need to register and set up a free account at <https://ac.courts.wa.gov>. If you have difficulty accessing the new portal, please contact the Administrative Office for the Courts at 800-442-2169. When filing electronically, please do NOT follow up with a paper copy.

Please contact the court at (253) 593-2970 or [coa2@courts.wa.gov](mailto:coa2@courts.wa.gov) if you have any questions or comments.

Thank you.

Jodie L. Thompson  
Case Manager

# APPENDIX H

August 20, 2019

**IN THE COURT OF APPEALS OF THE STATE OF WASHINGTON**

**DIVISION II**

MICHAEL W. WILLIAMS,

Appellant,

v.

WASHINGTON STATE DEPARTMENT OF  
CORRECTIONS,

Respondent.

No. 52395-7-II

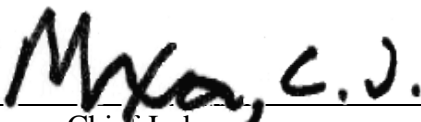
**ORDER DENYING MOTION TO  
MODIFY COMMISSIONER'S RULING**

Appellant, Michael W. Williams, moves the court to modify the commissioner's June 17, 2019 conditional ruling of dismissal. After consideration, we deny the motion.

IT IS SO ORDERED.

Panel: Jj. Maxa, Melnick, Crusier.

FOR THE COURT:

  
\_\_\_\_\_  
Chief Judge

## Jones, Amy (ATG)

---

**From:** Pavela, Marko L. (ATG)  
**Sent:** Tuesday, August 20, 2019 9:45 AM  
**To:** ATG MI COR Oly CE Reader; ATG MI COR OLY LA EF  
**Subject:** FW: D2 523957--MICHAEL W. WILLIAMS, APPELLANT V. WASHINGTON STATE DEPARTMENT OF CORRECTIONS, RESPONDENT--Order  
**Attachments:** MICHAEL W. WILLIAMS, APPELLANT V. WASHINGTON STATE DEPARTMENT OF CORRECTIONS, RESPONDENT.pdf  
**Importance:** High

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**From:** Thompson, Jodie  
**Sent:** Tuesday, August 20, 2019 9:44:29 AM (UTC-08:00) Pacific Time (US & Canada)  
**To:** Pavela, Marko L. (ATG); ATG MI COR Oly CE Reader  
**Subject:** D2 523957--MICHAEL W. WILLIAMS, APPELLANT V. WASHINGTON STATE DEPARTMENT OF CORRECTIONS, RESPONDENT--Order

To Counsel and Interested Parties:

Attached is an Order filed today, 8/20/2019.

This will be the only notice you will receive from the court.

The court requests that motions and other correspondence be sent via the Washington State Appellate Courts' Portal. In order to use the portal to file with the courts, you will first need to register and set up a free account at <https://ac.courts.wa.gov>. If you have difficulty accessing the new portal, please contact the Administrative Office for the Courts at 800-442-2169. When filing electronically, please do NOT follow up with a paper copy.

Please contact the court at (253) 593-2970 or [coa2@courts.wa.gov](mailto:coa2@courts.wa.gov) if you have any questions or comments.

Thank you.

Jodie L. Thompson  
Case Manager

# APPENDIX I



SUSAN L. CARLSON  
SUPREME COURT CLERK

ERIN L. LENNON  
DEPUTY CLERK/  
CHIEF STAFF ATTORNEY

THE SUPREME COURT  
STATE OF WASHINGTON



TEMPLE OF JUSTICE  
P.O. BOX 40929  
OLYMPIA, WA 98504-0929

(360) 357-2077  
e-mail: supreme@courts.wa.gov  
www.courts.wa.gov

September 12, 2019

LETTER SENT BY E-MAIL

Michael W. Williams (**sent by U.S. mail**)  
#882945  
Coyote Ridge Corrections Center  
PO Box 769  
Connell, WA 99326-0769

Hon. Derek Byrne, Clerk  
Division II, Court of Appeals  
950 Broadway, Suite 300  
MS-TB-06  
Tacoma, WA 98402

Marko L. Pavela  
Office of the Attorney General  
1125 Washington Street SE  
PO Box 40116  
Olympia, WA 98504-0116

Re: Supreme Court No. 97643-1 - Michael W. Williams v. Washington State Department of  
Corrections  
Court of Appeals No. 52395-7-II

Clerk, Counsel and Mr. Williams:

The Court of Appeals forwarded to this Court Mr. Williams' "MOTION TO MODIFY CLERK'S RULING PURSUANT TO RAP 17.7 AND RECONSIDERATION Under ARP 12.4". The case has been assigned the above referenced Supreme Court cause number.

Review of the Court of Appeals docket reflects that this case was dismissed by a Commissioner's ruling because the Appellant, Mr. Williams, did not file an opening brief by June 24, 2019. Mr. Williams moved to modify that decision and the Court of Appeals filed an order on August 20, 2019, denying the motion to modify. It appears that the motion referenced above seeks reconsideration of the Court of Appeals order. However, RAP 12.4 provides that a party may not file a motion for reconsideration of an order refusing to modify a ruling by the commissioner. Therefore, any further review of this case must be by the Supreme Court and it must be in the form of a petition for review.

Because the motion to modify was timely filed, Mr. Williams is granted permission to file a petition for review provided it is filed in this Court by no later than October 14, 2019. The contents and style of a petition for review should conform to the requirements of RAP 13.4(c). It is noted that RAP 13.4(f) provides that the petition for review "should not exceed 20 pages double spaced, excluding appendices." I have enclosed for the Petitioner a copy of RAP 13.4 and Forms 9, 5, and 6, and part F of Form 3 from the appendix to the Rules of Appellate



Page 2  
No. 97643-1  
September 12, 2019

Procedure. These provide the Petitioner with the basic required contents and the suggested form for a petition review.

In the alternative, Mr. Williams may request that the Supreme Court designate his motion to modify as a petition for review. If he wishes to do this, he must request that in writing to the Supreme Court by no later than October 14, 2019.

It is also noted that the \$200 filing fee has not been received. If the filing fee is not received by October 14, 2019, it is likely that this matter will be dismissed.

If a petition for review or a request to designate the motion to modify as a petition for review and the \$200 filing fee have not been received by October 14, 2019, it is likely that this case will be dismissed.

**Correspondence from this Court will be sent to the Petitioner via U.S. mail. Correspondence from this Court will be sent to counsel for the Respondent by e-mail attachment, not by regular mail. This office uses the e-mail address that appears on the Washington State Bar Association lawyer directory. Counsel are responsible for maintaining a current business-related e-mail address in that directory.**

Sincerely,



Susan L. Carlson  
Supreme Court Clerk

SLC:sk

Enclosures for Petitioner as stated

## Jones, Amy (ATG)

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**From:** Pavela, Marko L. (ATG)  
**Sent:** Thursday, September 12, 2019 1:00 PM  
**To:** ATG MI COR Oly CE Reader; ATG MI COR OLY LA EF  
**Subject:** FW: 97643-1 - Michael W. Williams v. Washington State Department of Corrections  
**Attachments:** - 976431 - Public - Letter Sent - Initiating Case - 9-12-2019.pdf  
  
**Importance:** High

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**From:** Kilgore, Shyann  
**Sent:** Thursday, September 12, 2019 12:58:54 PM (UTC-08:00) Pacific Time (US & Canada)  
**To:** Pavela, Marko L. (ATG)  
**Subject:** 97643-1 - Michael W. Williams v. Washington State Department of Corrections

*Attached is a copy of the letter issued by the Clerk or Deputy Clerk on this date in the above referenced case. A copy has been mailed to Mr. Williams. Please consider this as the original for your files, a copy will not be sent by regular mail. Any documents filed with this Court should be submitted via our web portal: <https://ac.courts.wa.gov/>*

*Shyann Kilgore*

*Administrative Assistant*

*360-357-2077*

 *Think Green! Please do not print this e-mail unless it is necessary.*

# APPENDIX J

SUSAN L. CARLSON  
SUPREME COURT CLERK

ERIN L. LENNON  
DEPUTY CLERK/  
CHIEF STAFF ATTORNEY

THE SUPREME COURT  
STATE OF WASHINGTON



TEMPLE OF JUSTICE  
P.O. BOX 40929  
OLYMPIA, WA 98504-0929

(360) 357-2077  
e-mail: [supreme@courts.wa.gov](mailto:supreme@courts.wa.gov)  
[www.courts.wa.gov](http://www.courts.wa.gov)

October 15, 2019

Michael W. Williams  
#882945  
Coyote Ridge Corrections Center  
PO Box 769  
Connell, WA 99326-0769

Marko L. Pavela (**sent by e-mail**)  
Office of the Attorney General  
1125 Washington Street SE  
PO Box 40116  
Olympia, WA 98504-0116

Re: Supreme Court No. 97643-1 - Michael W. Williams v. Washington State Department of  
Corrections  
Court of Appeals No. 52395-7-II

Counsel and Mr. Williams:

On October 14, 2019, this Court received and filed the "MOTION FOR DISCRETIONARY REVIEW" in the above referenced matter.

A review of the matter discloses that the request for review is improperly designated a motion for discretionary review. The pleading seeks review of the Court of Appeals order denying the motion to modify the Commissioner's dismissal of Mr. Williams's notice of appeal for failure to file an opening brief. Because that decision terminated review, a request for review of that decision must be in the form of a petition for review. See RAP 13.3 and 13.4. Therefore, the filing will be treated as a petition for review pursuant to RAP 13.3(d).

Any answer to the petition for review should be served and filed by November 14, 2019. The parties are directed to review the provisions set forth in RAP 13.4(d) regarding the filing of any answer to a petition for review and any reply to an answer.

Any answer to the motion for waiver of fees should be served and filed by November 14, 2019. Any reply to the answer to the motion for extension of time should be served and filed by December 5, 2019.



Page 2  
No. 97643-1  
October 15, 2019

Both the motion for waiver of fees and the petition for review have been set for consideration without oral argument by a Department of the Court. If the Court grants the motion for waiver of the filing fee, the Court will consider the petition for review on the merits. If the members of the Department do not unanimously agree on the manner of the disposition, consideration of the matter will be continued for determination by the En Banc Court.

Usually there is approximately three to four months between receipt of the petition for review in this Court and consideration of the petition. This amount of time is built into the process to allow an answer to the petition and for the Court's normal screening process. At this time it is not known on what date the matter will be determined by the Court. The parties will be advised when the Court makes a decision on the petition.

Any amicus curiae memorandum in support of or in opposition to a pending petition for review should be served and received by this Court and counsel of record for the parties and other amicus curiae by 60 days from the date the petition for review was filed; see RAP 13.4(h).

Sincerely,



Erin L. Lennon  
Supreme Court Deputy Clerk

ELL:sk

## Jones, Amy (ATG)

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**From:** Pavela, Marko L. (ATG)  
**Sent:** Tuesday, October 15, 2019 12:32 PM  
**To:** ATG MI COR Oly CE Reader; ATG MI COR OLY LA EF  
**Subject:** FW: 97643-1 - Michael W. Williams v. Washington State Department of Corrections  
**Attachments:** - 976431 - Public - Letter Sent - Other - 10-15-2019.pdf  
  
**Importance:** High

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**From:** OFFICE RECEPTIONIST, CLERK  
**Sent:** Tuesday, October 15, 2019 12:30:27 PM (UTC-08:00) Pacific Time (US & Canada)  
**To:** Pavela, Marko L. (ATG)  
**Subject:** 97643-1 - Michael W. Williams v. Washington State Department of Corrections

*Attached is a copy of the letter issued by the Clerk or Deputy Clerk on this date in the above referenced case. A copy has been mailed to Mr. Williams. Please consider this as the original for your files, a copy will not be sent by regular mail. Any documents filed with this Court should be submitted via our web portal: <https://ac.courts.wa.gov/>*

*Receptionist*

*Supreme Court Clerk's Office*

*360-357-2077*

**CORRECTIONS DIVISION ATTORNEY GENERAL'S OFFICE**

**November 01, 2019 - 2:43 PM**

**Transmittal Information**

**Filed with Court:** Supreme Court  
**Appellate Court Case Number:** 97643-1  
**Appellate Court Case Title:** Michael W. Williams v. Washington State Department of Corrections  
**Superior Court Case Number:** 16-2-02748-0

**The following documents have been uploaded:**

- 976431\_Answer\_Reply\_20191101143620SC162364\_0251.pdf  
This File Contains:  
Answer/Reply - Answer to Petition for Review  
*The Original File Name was AnswerPet4Rvw\_WithApp.pdf*

**A copy of the uploaded files will be sent to:**

- CORreader@atg.wa.gov
- beverly.cox@atg.wa.gov
- corolyaef@atg.wa.gov

**Comments:**

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Sender Name: Beverly Cox - Email: beverly.cox@atg.wa.gov

**Filing on Behalf of:** Marko L. Pavela - Email: markop@atg.wa.gov (Alternate Email: )

Address:  
Corrections Division  
PO Box 40116  
Olympia, WA, 98104-0116  
Phone: (360) 586-1445

**Note: The Filing Id is 20191101143620SC162364**