No. 977348

IN THE SUPREME COURT
OF THE STATE OF WASHINGTON

ROGER LEISHMAN,

Respondent,

v.

OGDEN MURPHY WALLACE PLLC and
PATRICK PEARCE,

Petitioners.

ANSWER TO PETITION FOR REVIEW

Appellant Roger A. Leishman
Pro Se, WSBA #19971

PO Box 2207
Bellingham, WA 98227
(206) 849-4015

TABLE OF CONTENTS

TABLE OF AUTHORITIES

Cases **Page(s)**

Constitutional Provisions

Statutes

Court Rules

Treatise

I. INTRODUCTION

This case concerns the proper construction of Washington's pioneering whistleblower immunity statute, RCW 4.24.500 *et seq.* ***But the case is also about what happens when lawyers start lying, and then won't stop***. Plaintiff Roger Leishman therefore ***joins*** Defendants in asking the Court to accept review.

The nation's first law protecting whistleblowers from "SLAPP" litigation – "Strategic Lawsuits Against Public Participation" – began in Olympia as the Brenda Hill Bill. SLAPP lawsuits are intended to silence critics by burdening them with such onerous legal expenses that they "intimidate citizens from exercising their First Amendment rights and rights under article I, section 5 of the Washington State Constitution." ***Segaline v. Dep't of Labor & Indus.***, 169 Wn.2d 467, 473, 238 P.3d 1107 (2010). During the 1980s, Brenda Hill and her husband bought a home from a real estate developer. When the Hills tried to refinance their mortgage, they discovered the developer had not paid the excise tax on hundreds of homes. Acting on information voluntarily provided by Mrs. Hill, the Washington Department of Revenue collected $477,000 in unpaid taxes owed by the developer. In retaliation, the developer filed a $1.8 million defamation suit that bankrupted the Hills. The Legislature

enacted the law now codified at RCW 4.24.500 *et seq.* in response to Brenda Hill's story. *See* Laws of 1989, ch. 234.

Three decades later, in March 2016, Leishman was employed by the Washington Attorney General's Office as chief legal advisor to Western Washington University. It was his dream job. Nevertheless, Leishman was struggling with both his recent PTSD diagnosis and a hostile work environment. When Leishman submitted a complaint regarding his supervisors' homophobic conduct, the AGO hired Defendants Ogden Murphy Wallace PLLC ("OMW") and Patrick Pearce to investigate Leishman's allegations. Both the AGO and Defendants explicitly represented to Leishman – and to the public as part of the State's rigorous contract procurement process – that Pearce's investigation was limited to Leishman's complaint of discrimination based on sexual orientation.

That was a lie. At the direction of senior employment lawyers at the AGO, Pearce focused his investigation on a separate, undisclosed complaint by Leishman's supervisor regarding conduct that was related to Leishman's disability. This secret complaint was one of the subjects of Leishman's representation by the experienced employment attorney Leishman finally had the good sense to hire. Six weeks later, Pearce

produced a substandard and biased report based on an improper *ex parte* interrogation and fabricated information provided solely by the AGO itself. Pearce's treatment of Leishman was part of a pattern of fraudulent conduct in the purportedly "independent" investigation business Defendants market to state and local government agencies.

After settling his wrongful termination claims against the State, Leishman filed this suit against Defendants asserting claims for fraud, negligent misrepresentation, and negligence, and for violations of the Washington Law Against Discrimination, RCW 49.60, and the Consumer Protection Act, RCW 19.86. The trial court entered judgment dismissing the case pursuant to CR 12(c). The court ruled as a matter of law that each of Leishman's causes of action was barred by RCW 4.24.510 – on the grounds that Pearce's taxpayer-funded assignment involved their communicating a "complaint or information" about Leishman to the AGO. On September 3, 2019, the Court of Appeals reversed the lower court's erroneous ruling.

As Defendants argue in their Petition for Review, this case presents important issues of substantial public interest that should be determined by this Court. Leishman respectfully requests that this Court ***grant review***, and affirm the Court of Appeals' decision.

II. ISSUES PRESENTED FOR REVIEW

1. When it enacted the "Brenda Hill Bill," RCW 4.24.500 *et seq*., did the Legislature intend to grant absolute immunity from civil liability for injuries caused by government vendors who are paid to communicate with their agency customers as part of their contractual engagements?

2. Did the trial court also err in entering judgment on the pleadings on the separate and independent ground that Leishman's Complaint includes claims that did ***not*** arise from Defendants' alleged communication to a government agency in April 2016?[1]

III. STATEMENT OF THE CASE

Courts resolving a motion for judgment on the pleadings under CR 12(c) must "presume the truth of the allegations and may consider hypothetical facts not included in the record." ***Wash. Trucking Ass'ns v. Emp't Sec. Dep't,*** 188 Wn.2nd 198, 393 P.3d 761 (2017) (emphasis added) (citing ***FutureSelect Portfolio Mgmt., Inc. v. Tremont Grp. Holdings, Inc.***, 180 Wn.2d 954, 962, 331 P.3d 29 (2014)). Dismissal is "appropriate only when it appears beyond doubt" that the plaintiff cannot prove any set of facts that "would justify recovery." ***P.E. Sys., LLC v. CPI Corp.***, 176 Wn.2d 198, 210, 289 P.3d 638 (2012)).

[1] The Court of Appeals did not reach Leishman's alternative argument for reversing the trial court's entry of judgment on the pleadings. *See* Appellant's Brief at 25-28; Reply Brief at 18-20. In the event the Court accepts review of this case and reverses the Court of Appeals' ruling regarding the status of government vendors, the Court may decide the second issue presented, or remand the case to the Court of Appeals instead. RAP 13.7(b).

A. The Washington Attorney General's Office discriminated against Leishman on the basis of his disability.

Within weeks of beginning work at the AGO in July 2015, Leishman began exhibiting strange new anxiety symptoms. ¶18.[2] Some of his AGO colleagues were bothered by Leishman's odd conduct, which was triggered by his as-yet-undiagnosed disability. Senior bureaucrats at the AGO quickly decided Leishman was a "bad fit," and resolved to get rid of him. Leishman's colleagues began keeping secret files documenting Leishman's purported misconduct.[3] *See, e.g.,* CP 188-89 (list of documents the AGO provided to Pearce, but not to Leishman or his lawyer).

In November 2015, Leishman's doctor diagnosed him with Post-Traumatic Stress Disorder. ¶21. His symptoms were triggered by recent workplace dynamics, but they were rooted in trauma that occurred thirty years ago.[4] The actions of Leishman's AGO colleagues, including their gaslighting campaign, significantly exacerbated his symptoms. ¶39.

On March 1, 2015, the AGO denied Leishman's initial request for a

---

[2] Citations to paragraph numbers refer to the Complaint, CP 1-13. Additional citations, including references to the Clerk's Papers, may be treated as presenting hypothetical facts. Leishman is not asking the Court to rule on the merits of any legal claim or bar grievance, but rather to determine whether the trial court misapplied CR 12(c).

[3] *See* https://www.rogerleishman.com/2018/12/ConfirmationBias.html.

[4] *See* https://www.rogerleishman.com/2019/07/UnrighteousDominion.html.

reasonable accommodation of his disability. ¶34. The AGO never responded to numerous subsequent communications about his disability from Leishman and his attorney before firing him ten weeks later. ¶52.

B. The Attorney General's Office also discriminated against Leishman on the basis of his sexual orientation.

In October 2015, the AGO took adverse employment action against Leishman – including giving a $3,000 raise to every single Assistant Attorney General except Leishman. ¶20. During his long-delayed performance evaluation in January 2016, Leishman discovered his employers had acted based on a litany of previously undisclosed supervisor complaints about his conduct. ¶25. As so often happens with perceived misfits, the AGO credited criticisms that reflected implicit or explicit bias. Some of the AGO's complaints related to Leishman's disability, and therefore involved conduct protected under the WLAD and the ADA.[5] Other AGO complaints reflected a pattern of homophobic conduct by certain of his supervisors and client contacts. For example, during the 2015-16 school year, WWU conducted a search for a new university president. During a public meeting of the Trustees, Leishman compared their task to Seattle Men's Chorus search to replace its

[5] *See, e.g.,* ***Riehl v. Foodmaker, Inc.,*** 152 Wn.2d 138, 93 P.3d 930 (2004); ***Gambini v. Total Renal Care, Inc.***,486 F.3d 1087 (9th Cir. 2007)

conductor for the first time in thirty-five years. CP 403. The Trustees were aware Leishman sang in the Chorus; several Trustees had attended concerts. Nevertheless, the State took adverse employment action against Leishman because one of its representatives was offended by this LGBT arts analogy. *Id*.

Following the Attorney General's internal procedure for handling allegations of discrimination, on March 2, 2016, Leishman submitted a written complaint regarding a specific homophobic encounter with his immediate supervisor that had occurred in September 2015. ¶33. This incident was among the AGO's bases for taking adverse employment action against Leishman in October 2015. *Id*.

C. The Attorney General's Office hired Pearce to investigate Leishman's sexual orientation discrimination grievance.

Defendant Ogden Murphy Wallace PLLC is a Washington professional limited liability corporation. ¶2. Defendant Patrick Pearce is a member of OMW. ¶3. OMW and Pearce are licensed private investigators. ¶4. Pearce is also an attorney. *Id.*

Defendants provide employment investigation services to state and local agencies under a rate-capped Master Contract with the State. CP 322. As required by their vendor contract, Defendants maintain an

insurance policy providing $10 million in coverage for liability arising from their investigation services. CP 480.

In March 2016, the State issued a Work Order authorizing Defendants to conduct an investigation into Leishman's discrimination complaint. Both the AGO and Pearce represented to Leishman that OMW's investigation was indeed limited to the sexual orientation discrimination issues raised by Leishman's complaint. ¶¶41-44. The AGO directed Leishman to meet with Pearce one-on-one and answer his questions. ¶51.

D. Leishman engaged an employment attorney to represent him.

Recognizing he was unable to communicate effectively with his supervisors about his disability or the AGO's purported performance concerns, Leishman hired Seattle attorney Sean Phelan on March 22, 2016. Ms. Phelan is an experienced Seattle employment lawyer with expertise in disability issues. Leishman engaged her to represent him in negotiating with the AGO about potential reasonable potential accommodations and any other disputes related to his employment, with a single narrow exception: as a veteran LGBT rights advocate himself, Leishman did ***not*** ask Ms. Phelan to represent him in connection with his pending sexual orientation discrimination grievance. ¶¶52-53.

E. At the direction of the Attorney General's Office, Pearce secretly changed the scope of their investigation assignment to include the subject matter of Leishman's representation by counsel.

Soon after assigning Leishman's sexual orientation discrimination complaint to OMW, the AGO decided it made sense to combine the investigation into his narrow discrimination complaint with a second assignment: having the same investigator evaluate secret complaints from the supervisors who had already decided to get rid of Leishman. In a damning March 16, 2016 email withheld by Defendants during discovery, Pearce referred to his initial meeting with Chief Deputy Attorney General Shane Esquibel and Assistant Attorney General Kari Hanson the week before. Pearce's email revealed the AGO's and Defendants' shared secret understanding regarding the ***actual*** scope of Pearce's investigation:

> Per our recent call, my understanding is I am looking at: 1) discrimination based on sexual orientation; and 2) **conduct violations regarding interactions with a coworker** on February 26 [sic].[6]

CP 339 (emphasis added); *see also* CP 197 (Final Ogden Murphy report states the investigation involved two separate issues).

In the same email, Pearce acknowledged that from the outset he

[6] During his regular weekly meeting with his supervisor on March 1, 2016, Leishman raised his voice when she accused him of faking his disability. ¶32. Leishman's response was typical for individuals living with PTSD. CP 322.

misled Leishman regarding the scope of his investigation:

> I had a brief phone call with the complainant this afternoon regarding the interview scheduled for tomorrow morning. **One of the topics that came up was scope of investigation. Per the complainant, he understood the scope was limited to discrimination based on sexual orientation.**

CP 339 (emphasis added). Neither the AGO nor Defendants ever told Leishman they'd expanded the original scope of the investigation to include the subject matter of Ms. Phelan's representation. ¶¶52-53.

After the AGO learned Leishman had engaged an attorney, the State's employment lawyers nevertheless improperly directed Pearce to again interrogate Leishman alone in OMW's offices for over an hour. When they realized their error, the lawyers representing the AGO stonewalled repeated inquiries from Leishman's employment attorney, deprived him of the benefit of counsel, and embarked on an unethical coverup.[7] ¶52.

The AGO and Defendants never gave Leishman or his attorney an opportunity to respond to his colleagues' criticisms. Instead, relying on admissions obtained from Leishman during Pearce's *ex parte*

[7] *See* https://www.rogerleishman.com/p/hanson-esquibel-rpc-42-violation.html. RPC 4.2 protects parties who are represented by counsel "against possible overreaching by other lawyers who are participating in the matter." ***In re Disciplinary Proceeding Against Haley***, 156 Wn.2d 324, 333–39, 126 P.3d 1262 (2006).

interrogation as well as on accusations from the AGO's secret files, Pearce issued his final investigation report on April 29, 2016.

Defendants invite the Court to review the entire Ogden Murphy Report. Pet. 6 n.1 (citing CP 197-215). Please do. The shoddiness of Pearce's work product, his neglect of Leishman's actual sexual orientation discrimination complaint, and Pearce's *ultra vires* expansion of the investigation to include the subject matter of Ms. Phelan's representation all speak for themselves.

F. Defendants' conduct is part of a pattern of deceptive business practices.

In May 2014, the Office of Insurance Commissioner's Chief Hearing Officer Patricia Petersen filed a whistleblower complaint against a superior in the OIC after he improperly pressured her to rule for the OIC in matters pending before her. ¶84. The OIC engaged Pearce to conduct a taxpayer-funded "independent" outside investigation. Defendants issued another clumsy report that whitewashed the OIC's conduct and broadly attacked Judge Petersen's character and competence. ¶85. The State ultimately paid $450,000 to Judge Petersen to settle her claim. *Id.*

G. The trial court swiftly dismissed this *pro se* lawsuit under CR 12(c).

Leishman filed his Complaint on May 10, 2017. CP 1. During a

discovery conference on August 18, 2017, counsel for Defendants delighted the trial judge with the news that they would be filing a CR 12(c) motion, although the first available hearing date was not until November 3, 2017. The court forbade Leishman from conducting discovery related to Pearce's employer-whitewashing investigation into Judge Petersen's conduct. CP 289. At the State's request, the court also entered a broad order permanently sealing virtually all of OWM's file from the Leishman investigation, rather than considering Leishman's individual objections to the AGO's numerous overbroad privilege designations. CP 435.

In their sandbagging reply brief in support of the CR 12(c) motion, Defendants attached a recent order from another busy King County Superior Court judge who had applied RCW 4.24.510 to dismiss the vendor law firm co-defendants in an untidy case brought by a *pro se* couple. CP 368-69 (citing ***Jones v. Bellevue School District 405, et. al.,*** Case No. 16-2-22028-2 SEA). Defendants neglected to cite this case as authority in their CR 12(c) Motion – even though Defendants' log-rolling RCW 4.24.510 argument was ***plagiarized verbatim*** from the lawyer-

defendants' successful motion to dismiss.[8] Leishman's experience with RCW 4.24.510 as a *pro se* litigant in the Washington courts is not an isolated incident.

The trial court granted Defendants' CR 12(c) motion on November 3, 2017. When Defendants filed their motion for fees, they ostentatiously declined to seek "reimbursement for the majority of the work performed by its counsel, despite the fact much of this work could be considered to be related to 'establishing [OMW's] defense' pursuant to RCW 4.24.510." CP 442. On January 2, 2018, the trial awarded the $24,058.55 in attorney's fees requested by Defendants. CP 552. On September 3, 2019, the Court of Appeals issued a published decision reversing the judgment.

IV. ARGUMENT

A. The Court of Appeals correctly applied established principles of statutory construction to RCW 4.24.500 *et seq*.

"The fundamental purpose of statutory interpretation is to ascertain and carry out the intent of the legislature considering the statute as a whole." ***Dep't of Ecology v. Campbell & Gwinn, LLC***, 146

[8] *Compare* Yarmuth Defendants' Motion to Dismiss at 9-12 (3/27/17) in ***Jones*** with Defendants' CR 12(c) Motion, CP 310-14. In an ironic coincidence, the Petition for Review in a related case is currently before the Court. *See* ***Bellevue Athletes Alumni Group v. Bellevue SD 405, et al.***, No. 97733-0. However, both the RCW 4.24.510 issue and the lawyer co-defendants have disappeared without a trace from the Bellevue High football litigation.

Wn.2d 1, 9-10, 43 P.3d 4 (2002) (emphasis added). RCW 4.24.510 began as part of the "Brenda Hill Bill." ***Johnson v. Ryan***, 186 Wn. App. 562, ¶ 16, 346 P.3d 789 (2015). Section 1 of Washington's whistleblower immunity law, codified as RCW 4.24.500, ***identifies the purpose of statute***: to protect "citizens who wish to report information to federal, state, or local agencies" from the "threat of a civil action for damages." *See also* ***Henne v. City of Yakima***, 182 Wn.2d 447, ¶¶ 3, 11, 341 P.3d 284 (2015); Laws of 2002, ch. 232 § 1 (when it subsequently amended Washington's anti-SLAPP law to limit the role of a defendant's good or bad faith, the Legislature reiterated that "SLAPP suits are designed to intimidate the exercise of First Amendment rights and rights under Article I, section 5 of the Washington state Constitution").

Defendants ask this Court to myopically view individual words in one section of the Brenda Hill Bill and give each word its broadest conceivable meaning. But courts have already rejected this mechanical approach to RCW 4.24.510. *See, e.g.,* ***Segaline***, 169 Wn.2d at 473 (Madsen, C.J., concurring) (emphasis added) (citing ***Kobrin v. Gastfriend***, 443 Mass 327, 332, 821 N.E.2d 60 (2005) (Massachusetts' similar anti-SLAPP statute did not apply to expert retained by agency to evaluate professional misconduct allegations); ***Reid v. Dalton***, 124 Wn. App. 113,

¶¶ 42-43, 100 P.3d 349 (2004) (despite its literal language, RCW 4.24.510 does not to every possible communication to a government agency); ***Eugster v. City of Spokane***, 139 Wn. App. 21, 156 P.3d 912 (2007); *see also* ***Cardno ChemRisk, LLC v. Foytlin***, 68 N.E.3d 1180, 1189 (Mass. 2017) (anti-SLAPP statute protects those who "petition their government as citizens," not merely as "vendors of services").

Like the Court of Appeals and the Massachusetts Supreme Judicial Court in ***Kobrin v. Gastfriend,*** this Court should hold that Washington's citizen whistleblower anti-SLAPP statute does ***not*** immunize communications by government vendors within the context of their paid engagement.

B. The Court of Appeals' decision is consistent with Washington public policy regarding both whistleblowers and government contractors.

Defendants correctly observe that RCW 4.24.510 immunizes the communications of private citizen whistleblowers when they report potential wrongdoing to the relevant governmental authorities, "regardless of content or motive." ***Bailey v. State***, 147 Wn. App. 251, 261, 191 P.3d 1285 (2008) (citing Laws of 2002, ch. 232, § 1). As with the defendants in ***Segaline*** and ***Kobrin***, what distinguishes Defendants from the individuals and other private entity whistleblowers who report

potential wrongdoing to the government is their ***status***, not their motivation. OMW is in the business of providing various personnel services for the benefit of its government agency clients. A commercial vendor ***cannot*** be engaged in "advocacy to government," Laws of 2002, ch. 232, § 1, because it is being ***paid by the government itself*** to communicate with its client as part of its services. *See, e.g.,* RCW 42.17A.635(3) (sharply limiting circumstances where agencies "may expend public funds for lobbying").

Defendants also argue courts should grant absolute immunity to businesses hired to provide information to government agencies "in order to avoid the chilling effect that would exist if those investigating matters of public concern to government entities were silenced, or tempted to modify or distort their opinions, out of fear of facing civil damage claims from those who disagree." Pet. 20. However, Washington has a well-established body of law deterring misconduct by businesses that are paid for supplying information to others, and governing their potential liability for the injuries they cause. *See, e.g.,* ***Specialty Asphalt & Constr., LLC v. Lincoln County***, 191 Wn.2d 182, ¶¶ 26-28, 421 P.3d 925 (2018) (citing RESTATEMENT (2D) OF TORTS § 552 (Am. Law Inst. 1965)); RCW 19.86 (Consumer Protection Act).

Moreover, under Washington law "professionals and their clients can allocate risks and ensure against 'expected liability exposure.'" ***Donatelli v. D.R. Strong Consulting Eng'rs, Inc.***, 179 Wn.2d 84, ¶ 25, 312 P.3d 620 (2013) (citing ***Berschauer/Phillips Constr. Co. v. Seattle Sch. Dist. No. 1***, 124 Wn.2d 816, 826-27, 881 P.2d 986 (1994)). Before hiring Defendants, the State required OMW to obtain a commercial liability policy with $10 million in coverage. CP 480.

The Legislature did not intend for the Brenda Hill Bill to apply to taxpayer-funded vendors like OMW. To the contrary, it is Leishman who is the victimized whistleblower, not Pearce. The trial court's backwards ruling added further insult to the injuries caused by Defendants and the AGO. Defendants' over-literal reading of RCW 4.24.510 is so broad ***it would immunize government contractors who submit fraudulent invoices to their agency clients***. There is no way to narrow Defendants' arguments sufficiently enough to justify dismissing Leishman's Complaint under CR 12(c)'s strict standard without also granting carte blanche to countless government contractors – regardless a vendor's dishonesty or incompetence, and regardless of who gets hurt. This Court should accept review and affirm the Court of Appeals.

V. CONCLUSION

At this point I will abandon the third person mask, and speak directly to the justices of the Washington Supreme Court. Not because I appeared before you as an advocate before I was sidelined by my disability, nor because we previously collaborated in the work of the bench and bar – but because as an honest plaintiff and lawyer I want you to know exactly what kind of wormy case this is before you decide whether to open the can and accept review at the suspiciously enthusiastic request of ***both*** parties. To make the subtext explicit, I am joining Defendants' request for review because this case involves ***two vexing perennial issues***: the systemic challenges faced by under-resourced *pro se* litigants, and the decline in professionalism by members of the bar.

After I settled my employment claims against the State with the help of my attorney Ms. Phelan, I reached out to OMW's managing partner in an effort to clear my name. I naively believed this was all a horrible misunderstanding. In my defense, (1) I was still addled by PTSD; (2) while in private practice I never had the misfortune of encountering *faux* independent attorney-investigators who lied about their assignments; and (3) I had not yet obtained copies of the AGO's

incriminating documents via the Public Records Act. In any event, Defendants responded by lawyering up.

On the surface, this appears to be just another factually messy and time-consuming case involving too many lawyers and an impaired *pro se* plaintiff. Two years ago, distinguished Seventh Circuit Judge Richard Posner shocked the legal world by announcing his retirement from the federal bench because he "suddenly realized that people without lawyers are mistreated by the legal system, and he wanted to do something about it."[9] In this case it is sad but not surprising that a busy trial court judge grasped at the slimmest of reeds to get rid of us.

I filed this *pro se* lawsuit in May 2017. That means that if the Court denies review in the ordinary course of things, I will be starting over in Superior Court from scratch after waiting ***three years***. Fortunately I have a strong support system, much improved mental health, and appellate expertise. How many less privileged *pro se* litigants are mowed down each year by the weaponizing of RCW 4.24.510 and similar miscarriages of justice?

[9] "An Exit Interview with Richard Posner, Judicial Provocateur," https://www.nytimes.com/2017/09/11/us/politics/judge-richard-posner-retirement.html.

This case also demonstrates what happens when lawyers routinely lie and judges do not stop them. Together with his high-ranking collaborators at the AGO, Pearce lied to me about the scope of his investigation. Defendants lied to the Court of Appeals about the undisputed documentary record. *See* Reply Brief at 8-9. And Defendants are lying to this Court about the "gist" of my Complaint. Pet. 7.

Like Defendants and their cynical lawyers, I do not expect the Court to accept review of the Court of Appeals' straightforward and sound opinion. Nevertheless, despite the continuing harm to my family from Defendants' delay tactics, I hope that you ***do*** choose to shine the bright light of justice on this particular story. Since being diagnosed with PTSD, I've learned the struggle for full inclusion of disabled people hasn't progressed much further than where LGBT folks were when I began advocating for that community a quarter century ago. In particular, few plaintiffs living with mental illness have the capacity to engage in a coordinated campaign of public education and impact litigation. Someone has to do it. This Court should accept review, and affirm the decision of the Court of Appeals.

DATED October 21, 2019.

/s/ Roger A. Leishman, WSBA # 19971
Pro Se

CERTIFICATE OF SERVICE

I certify that on this day I caused the foregoing document to be served by email via the Court's electronic portal as follows:

Robert Sulkin: rsulkin@mcnaul.com, rlindsey@mcnaul.com

Claire Martirosian: cmartirosian@mcnaul.com, iwillis@mcnaul.com

DATED: October 21, 2019

/s/ Roger Leishman

October 21, 2019 - 11:46 AM

Transmittal Information

Filed with Court:	Supreme Court
Appellate Court Case Number:	97734-8
Appellate Court Case Title:	Roger Leishman v. Ogden, Murphy Wallace, et al.

The following documents have been uploaded:

- 977348_Answer_Reply_20191021114502SC652771_4134.pdf
  This File Contains:
  Answer/Reply - Answer to Petition for Review
  The Original File Name was Leishman Answer to Petition for Review.pdf

A copy of the uploaded files will be sent to:

- Noah.Purcell@atg.wa.gov
- RLindsey@mcnaul.com
- cmartirosian@mcnaul.com
- noahp@atg.wa.gov
- rsulkin@mcnaul.com
- tdo@mcnaul.com

Comments:

Sender Name: Roger Leishman - Email: rogerleishman@reachfar.net
Address:
PO BOX 2207
BELLINGHAM, WA, 98227-2207
Phone: 360-331-3077

Note: The Filing Id is 20191021114502SC652771