

FILED
SUPREME COURT
STATE OF WASHINGTON
7/9/2020 1:12 PM
BY SUSAN L. CARLSON
CLERK

98756-4

APPEAL FROM

DIVISION 1 CAUSE NO. 80581-9
for cases 10-2 03289-1 and 15-2-00660-2

TO
SUPREME COURT
STATE OF WASHINGTON STATE

JEAN AND MICHAEL REID
APPELLANT
V

PETITION FOR REVIEW
BY
APPELLANT

JULIE AND THOMAS MIKE CARNEY
RESPONDENT

PRO SE

Jean and Michael Reid
p o box 2178 Blaine wa 98231
jeansdominoeffect@gmail.com
360-223-5623

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CODES and Authorities

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RAP 9.6 – 9.2

RAP 12.2

CASES

state v Ashbaugh, 90 Wn.2d 432, 583 P.2d 1206, (1978)

Vasquez, 95 Wn.App. 12, 15, 972 P.2d 109 (1998). State v Young 198 Wn.App.

797, 396 P. 3d 386, (Div 2 2017)

The Reids have been the recipients of an ongoing miscarriage of justice by the trial court and the Court of Appeals; culminating in the Court of Appeal's dismissal of their timely filed Notice of Appeal on March 10, 2020.

The Court dismissed the Reids Appeal even though it they timely filed their appeal, statement of arrangements, clerks papers and report of proceedings.

This is not the first time the Court of Appeals has unfairly and unlawfully dismissed an appeal by the Reids. It previously dismissed the Reids' Appeal of an Order denying a motion to show cause as a precedent to a motion to vacate pursuant to CR 60. EXHIBIT (1)

At this time in America, it is especially important that justice occur, and, that findings and decisions be the result of a blind application of the facts to the law. This has not occurred in this case.

- Michael Reid bought and paid for blk 8 from 2001-2005.
- Michael Reid and Julie Carney entered into a partnership agreement with Julie Carney in 2006.
- The partnership was to develop two parcels commonly known as Ramstead and Block 8 (4620 Lincoln Rd. in Bellingham. The Reids had bought and paid for Blk 8 from March 2001 thru 2005. This was for the Reids retirement

income with agreement to cash Carney out at any time she wanted. Not to sell the property unless the Reids agreed.

- The Reids lived on the same property and/or used it between 2000 and 2011. Terms included the Reids always keeping blk 8

- Ms. Carney sought to take possession of the partnership property by filing a complaint for an Unlawful Detainer against the Reids in 2011. Carney illegally performed a self-help eviction prior to her perjury in court to back up her actions. CP 1

- Ms. Carney defrauded the trial court by perjuring herself when she falsely asserted and falsely declared that the subject property was owned solely by Ms. Carney and that the Reids had no interest in the property. CP 1-5; CP 28-29 and 87-95.

As a result of Ms. Carney's perjury:

(1) The trial court summarily issued writs of ejectment and restitution and had the Reids removed from their own partnership property in violation of RCW 59.16.030. CP 96-96 .

(2) **The trial court later continued this miscarriage of justice when it denied the Reids' Motion to Show Cause, which is a condition precedent, to and as part of the process required before filing a Motion to Vacate the Order of Ejectment and Writs of Restitution.¹ CR 60(e). CP 745-746. This motion was filed only after**

¹ **CR 60 requires a party file a Motion to Show Cause prior to the hearing on the Motion to Vacate** The volume and the strength of the briefing on the Show Cause Motion included the bases CR 60(b)(3), (4), (5) and (11). **The Motion to Show Cause was briefed as if it was a Motion to Vacate and yet the Court simply denied the Motion to Show Cause.**

discovering the above referenced perjury and fraud on the Court. The Reids' moved for an Order to Show Cause why the Writ(s) of Ejectment and Order(s) pertaining to the Unlawful Detainer should be Vacated. CP 346-369, 493-576, 370-371, 718-722, 177-232, 379-492 and 233-245.

(3) The Reids' timely appealed the denial their motion to show cause. This was filed during the underlying case because the denial of a Motion to Show Cause is a matter for Direct Review. See RAP 2.2(a)(10). EX. Notice of Appeal 2018. Unfortunately, the Commissioner for the Court of Appeal and later three judges on the Court of Appeals; dismissed the Reids' appeal without ruling or resolving the legal or substantive issue, holding that the appeal was discretionary. Exhibit 1 The Commissioner and later the Court of Appeals oddly held that an order denying a Motion to Show Cause, as a condition precedent to filing a Motion to Vacate, was not an order denying a Motion to Vacate. EX See Briefing as an Exhibit 2²

This ruling is ridiculous! If this rationale is extended to other cases it could have the effect of denying all parties the right to pursue a Motion to Vacate on direct review.. A trial court could simply deny a Motion to Show Cause, as occurred in this case, or insist that a Motion to Show cause be filed, only to deny such a motion. Accordingly, the denial of the Reids motion to show cause are clearly erroneous. CP679-680,715-717,803-805.

² The Reids maintain that this is evidence of bias by both the trial court and the Court of Appeals.

(4) During trial, Ms. Carney admitted before the Court that she knowingly committed perjury and defrauded the trial court resulting in the Reids eviction.

Q. All right. Now, help me understand this, if the partnership of Michael Reid and Julie Carney owned the Ramstead and Block 8 properties in 2006, **why did you evict the Reids from Block 8 in 2009?** A. **Because the debt was severe** and I needed to rent the house to be able to pay the mortgages and they were told that numerous times. Q. **But you claim during that process that the property was yours personally and not both Michael Reid's and yourself, did you not?** A. I was carrying the debt. I bought the house originally, yes. Q. My question is, you've testified today that Lincoln Park project, Michael Reid and you, owned the Block 8 and Ramstead equally 50-50, owned Ramstead and Block 8 50-50 in 2006, correct? A. Lincoln Park? Q. The partnership. A. Okay. The partnership, yes. Q. Okay. So my question then is if the partnership owned the property 50-50, is the only reason for evicting them is that you needed more money in 2011? A. They were not paying since 2005. They had not paid one penny for anything. I was going deeply in debt and I needed money to be able to pay the mortgages. That house had a mortgage, it had two, and so they were told they could not live in the house because I needed to rent it out to help pay the mortgage. It was very simple. Q. **All right. But to do that you represented to the Court before Judge Snyder that you personally and separate from Michael Reid owned Block 8, did you not?** A. I probably did because I was confused about partnership. I'm the one paying the debt, okay? Q. **Which is what you agreed to, to cover the costs.** A. Yes, but I had to pay the mortgages and I need to have income to do that. Q. **Uh-huh. So would that be a misrepresentation that you made to Judge Snyder's court?** A. No. Q. Why not? A. Because I told them they cannot live in the house, okay? Q. Okay. If it was owned 50-50, if it was a partnership property, wouldn't you need a majority of the partners to make that decision? A. No. Q. Why not? A. Because they were told they could not live in the house. Q. You told them that? A. Yes, because I'm the one paying the debt. Q. Okay. When did you tell them that? A. Numerous times between 2005 and 2010. Q. **Well, okay. I won't beat this to a dead horse, but it's your assumption that since you told them that they couldn't stay in the property, that it was okay to represent the property in 2011 before Judge Snyder as yours?** A. I guess I was confused, okay? I'm sorry. I was trying to pay my mortgage. That was more important than anything. Q. Oh, I get that. I mean especially with the Great Recession I understand the needs of finances and property values were stuck and I know that everybody needed money back then. I understand

that. A. Yes. Q. Okay. A. None was coming in except my own. Q. So just to be clear, you had Mr. Reid and Ms. Reid evicted from Block 8, which was owned by the partnership, because you needed money in 2008, 2009, and beyond? A. To pay the mortgage, correct. **Q. All right. And at that time, do you think it's right that just because you needed money it was okay to kick them off the property? A. Yes, I do.** RP 471- L 13 to RP. 474 L-25.

See also RP 608 and 611 (Carney admits to filing Complaint for Unlawful Detainer stating the property was Ms. Carney's and not the Reids. CP 1-27 P 1-2 of the Complaint)

And, after Ms. Carney had the court evict the Reids, based upon her misrepresentations to the court, she then denied the existence of a partnership, even though she pled dissolution of a partnership in Ms. Carney's first complaint. **CP 163-172 (In subsequent lawsuit, Ms. Carney denies that the subject property was owned in partnership.) and, Declaration of Carney. CP 175-176**

And yet, despite overwhelming evidence that Ms. Carney committed fraud and perjury and otherwise admitted to lying, the trial court adopted most, if not all, of her Findings of Fact and Conclusions of Law.

(6) Finally, after all of this, the Commissioner once again dismissed the Reids' timely filed appeal and the Court of Appeals denied the Motion to Modify it. EXHIBIT. The problem was that one of two Court Reporters may have failed to timely file Verbatim Reports of Proceedings with the Court of Appeals as requested and paid for by the Reids. The Order said in pertinent part: **If all verbatim reports are not filed by 2-28-20, the case will be dismissed without further notice.** EX. That court reporter followed the instructions sent by Hillary Lubin, case

v Handler allowing March 6th as the final deadline to file the VRs Exb.and Rhonda Jensen took until the last minute to get hers filed. Exb. Further She filed Wendy Raymond's at 4:53pm on the 28th of Feb. so she knew Full well the time discussed by she and Wendy as to the deadline.

The above are simply a small sampling of the blatant errors.

A. IDENTITY OR PETITIONER

Petitioners Michael and Jean Reid

B. COURT OF APPEALS DECISION

Petitioners seeks review of the Court of Appeals decision filed on March 10, 2020 dismissing the Reids' Appeal and denied the Reids' Motion to Modify the Clerks dismissal. This of course includes the underlying Notation Order of Dismissal by the Commissioner.

C. ISSUES PRESENTED ON REVIEW

Whether the Court of Appeals' denial of the Reids' Motion to Modify the Commissioners Dismissal of the Appeal was error.

D. STATEMENT OF THE CASE

Following a bench trial, the Reids timely filed their Notice of Appeal to the Court of Appeals and timely filed their Statement of Arrangements, paid for and had the Clerk transmit and file 794 exhibits as Clerks Papers. See List of Clerks Papers. The Reids asked for a continuance to file their Verbatim Report of Proceedings The Commissioner, on January 24, 2020, granted the Reids an extension

until February 28, 2020 to file their Verbatim Report of Proceedings. EX. The Reids paid for the Verbatim Report of Proceedings to be transcribed and filed no later than December of 2019. DECLARATION OF REID IN SUPPORT OF Their MOTION TO MODIFY. On February 28, 2020, after 5:00 pm Rhonda Johnson, on behalf of Wendy Raymond, filed Wendy's Report of Proceedings. Thereafter, on March 5, 2020, Hillary from the Court of Appeals granted a continuance of the February 28 deadline until March 6, 2020. EX. Rhonda Jensen finally filed the remaining verbatim reports of proceedings than seven including the entire trial transcript.. verbatim report of proceedings on March 6, 2020 (7);. At this same time, on March 6, Hillary informed the Reids that some of the RP's and CP's were identified but unnecessary. Accordingly, on March 6, 2020, they filed a Motion to Amend their Statement of Arrangements to bring everything into harmony. EXHIBIT. Four days later, the Commissioner Dismissed the Reids' Appeal stating the Reids had not complied with the prior Order, when in fact; they had. The Order simply required them to file their Verbatim Report of Proceedings.

E. ARGUMENT WHY REVIEW SHOULD BE ACCEPTED

RAP 13.4(b) maintains a threshold for the Supreme Court to accept review. It states:

A petition for review will be accepted by the Supreme Court only: (1) **If the decision of the Court of Appeals is in conflict with a decision of the Supreme Court;** or (2) If the decision

of the Court of Appeals is in conflict with a published decision of the Court of Appeals; or (3) **If a significant question of law under the Constitution of the State of Washington or of the United States is involved; or (4) If the petition involves an issue of substantial public interest that should be determined by the Supreme Court.**

In this case, factors (1), (3) and (4) are applicable as The right to appeal is a constitutional right. *State v. Ashbaugh*, 90 Wn.2d 432, 583 P.2d 1206, (1978)

The Appellate Court should not have dismissed the Motion to Modify for the following reasons: (1) There were no Report of Proceedings that had not been filed. Regrettably, the Reids listed RP's for June 9, 2011, and Nov. 17, 2011. However, as can be seen by the email from Rhonda Jensen there were no hearings on these dates.

----- Forwarded message -----
From: **Rhonda Jensen** <RJensen@co.whatcom.wa.us>
Date: Fri, Mar 6, 2020 at 11:49 AM
Subject: transcript filed this morning
To: jean reid <jeansdominoeffect@gmail.com>

Good Morning, Ms. Reid:

Hopefully, you've received the email this morning from the court of appeals that I filed a transcript this morning **containing several hearing dates.**

The one file I filed this morning contains:

Jan. 14, 2011
Feb. 11, 2011
Mar. 18, 2011
Apr. 1, 2011

Apr. 22, 2011 and
May 20, 2011

The statement of arrangements you emailed to Wendy Raymond on Dec. 13, 2019, also listed dates of June 9, 2011, and Nov. 17, 2011. I do not have records that there were court hearings held in front of Judge Snyder that day in your case. The court file for cause number 10-2-03289-1 shows that documents in that file go from June 8, 2011 to Aug. 31, 2011, with nothing indicated in between, and Nov. 8, 2011, to Nov. 29, 2011.

I have had almost non-existent internet service in my office all week, but I am working outside the office today, so please email me if you need to contact me.

Rhonda Jensen

STANDARD OF REVIEW:

We review a motion to modify a commissioner's ruling de novo. *State v. Vasquez*, 95 Wn.App. 12, 15, 972 P.2d 109 (1998). *State v. Young*, 198 Wn.App. 797, 396 P.3d 386, (Div. 2 2017).

The applicable Rules of Appellate Procedure Apply;

RAP 12.2 DISPOSITION ON REVIEW The appellate court may reverse, affirm, or modify the decision being reviewed and take any other action as the merits of the case and the interest of justice may require.

In this case, justice required the Court of Appeals to modify the Reids Report of Proceedings to strike the dates for which no hearing existed. The Court of Appeals should not have simply dismissed the appeal after so much time and expense and after substantial compliance. RAP 1.2(a) states in part **“These rules will be liberally interpreted to promote justice and facilitate the decision of cases on the merits.”**

RAP 9.10 CORRECTING OR SUPPLEMENTING RECORD If a party has made a good faith effort to provide those portions of the record required by rule 9.2(b), the appellate court will not ordinarily dismiss a review proceeding or affirm, reverse, or modify a trial court decision or administrative adjudicative order certified for direct review by the superior court because of the failure of the party to provide the appellate court with a complete record of the proceedings below. If the record is not sufficiently complete to permit a decision on the merits of the issues presented for review, the appellate court may, on its own initiative or on the motion of a party (1) direct the transmittal of additional clerk's papers and exhibits or administrative records and exhibits certified by the administrative agency, or (2) correct, or direct the supplementation or correction of, the report of proceedings. The appellate court or trial court may impose sanctions as provided in rule 18.9(a) as a condition to correcting or supplementing the record on review. The party directed or permitted to supplement the record on review must file either a designation of clerk's papers as provided in rule 9.6 or a statement of arrangements as provided in rule 9.2 within the time set by the appellate court.

Based upon an application of the facts to the law, dismissal was not appropriate and the Petition for Review to this Court should be granted.

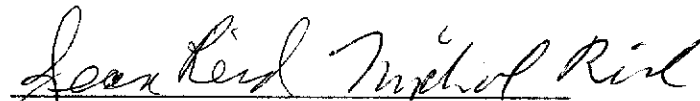
F. CONCLUSION

We respectfully ask the Court to reverse the Court of Appeals Dismissal and refusal to modify the Commissioner's Dismissal. Too much harm has befallen us and we seek justice. We filed the VR's according to the court order and the extension, case manager, Hillary Lubin granted. The court reporter Rhonda Jensen had control of filing those and was aware of the dates. The Reids also filed a motion to correct the dates which was not heard due to dismissal. We have the right to have our appeal ruled on its merits and the laws. And request we be treated with fairness and justice. We have been asking since 2011 to have our original ruling by Snyder reviewed and no one addresses the

law or the error made by that Judge. The purchase and payment of the home was years before any partnership was formed. The Carneys change their testimony to fit the need at the time. We ask for a chance to have our case looked at in context and from the beginning rather than the bits and pieces the Carneys and their lawyers have been allowed to get away with. They have 20 yrs of expenses for partnership bills and some prior to the Reids meeting them.

RESPECTFULLY SUBMITTED this 8th day of July, 2020.

By:


Jean & Michael Reid

Petition for review

Jean & Michael Reid
PO Box 2178, Blaine Wa98231
jeansdominoeffect@gmail.com
360 223 5623

*The Court of Appeals
of the
State of Washington*

RICHARD D. JOHNSON,
Court Administrator/Clerk

DIVISION I
One Union Square
600 University Street
Seattle, WA
98101-4170
(206) 464-7750
TDD: (206) 587-5505

March 10, 2020

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nathanmcallisteratty@gmail.com

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Blaine, WA 98231
jeansdominoeffect@gmail.com

CASE #: 80581-9-1

Michael Reid and Jean Reid, Appellants v. Julie Carney and Thomas Carney, Respondents

Counsel:

The following notation ruling by Richard D. Johnson, Court Administrator/Clerk of the Court was entered on March 10, 2020, regarding Appellant's Motion to Amend Statement of Arrangements and Extend Time to File Report of Proceedings:

As the conditions of the January 24, 2020 ruling have not been met, the appeal is accordingly dismissed.

Please be advised a ruling by a Clerk "is not subject to review by the Supreme Court." RAP 13.3(e)

Should counsel choose to object, RAP 17.7 provides for review of a ruling of the Clerk. Please note that a "motion to modify the ruling must be served... and filed in the appellate court not later than 30 days after the ruling is filed."

Sincerely,



Richard D. Johnson
Court Administrator/Clerk

HCL

EX 6 1

WHATCOM COUNTY SUPERIOR COURT

February 28, 2020 - 4:53 PM

Transmittal Information

Filed with Court: Court of Appeals Division I
Appellate Court Case Number: 80581-9
Appellate Court Case Title: Michael Reid and Jean Reid, Appellants v. Julie Carney and Thomas Carney, Respondents
Superior Court Case Number: 15-2-00660-2

The following documents have been uploaded:

- 805819_Report_of_Proceedings - Volume 3_20200228164608D1099040_2707.pdf
This File Contains:
Report of Proceedings - Volume 3, Pages 243 to 433, Hearing Date(s): 02/26/2019 *Report of Proceedings*
Total Number of Pages:
The Original File Name was REID V CARNEY 2-26-19.pdf
- 805819_Report_of_Proceedings - Volume 4_20200228164608D1099040_1697.pdf
This File Contains:
Report of Proceedings - Volume 4, Pages 434 to 449, Hearing Date(s): 04/19/2019 *Report of Proceedings*
Total Number of Pages:
The Original File Name was REID V CARNEY 4-19-19.pdf
- 805819_Report_of_Proceedings - Volume 5_20200228164608D1099040_3741.pdf
This File Contains:
Report of Proceedings - Volume 5, Pages 450 to 636, Hearing Date(s): 04/22/2019 *Report of Proceedings*
Total Number of Pages:
The Original File Name was REID V CARNEY 4-22-19.pdf
- 805819_Report_of_Proceedings - Volume 6_20200228164608D1099040_1212.pdf
This File Contains:
Report of Proceedings - Volume 6, Pages 637 to 856, Hearing Date(s): 04/23/2019 *Report of Proceedings*
Total Number of Pages:
The Original File Name was REID V CARNEY 4-23-19.pdf
- 805819_Report_of_Proceedings - Volume 7_20200228164608D1099040_4675.pdf
This File Contains:
Report of Proceedings - Volume 7, Pages 857 to 926, Hearing Date(s): 04/24/2019 *Report of Proceedings*
Total Number of Pages:
The Original File Name was REID V CARNEY 4-24-19.pdf

A copy of the uploaded files will be sent to:

- bianchi@lasher.com
- jeansdominoeffect@gmail.com
- knudsen@lasher.com
- nathanmcallisteratty@gmail.com
- wraymond@co.whatcom.wa.us

Ex 6 J

Comments:

Wendy Raymond could not access the portal through her log-in. I am filing these verbatim reports of proceedings for her. Rhonda Jensen, Official Reporter, Whatcom County, WA

Sender Name: Rhonda Jensen - Email: rjensen@co.whatcom.wa.us

Address:

300 Grand Avenue

Bellingham, WA, 98225

Phone: (360) 778-5608

Note: The Filing Id is 20200228164608D1099040

Ex 6 2

WHATCOM COUNTY SUPERIOR COURT

March 06, 2020 - 10:16 AM

Transmittal Information

Filed with Court: Court of Appeals Division I
Appellate Court Case Number: 80581-9
Appellate Court Case Title: Michael Reid and Jean Reid, Appellants v. Julie Carney and Thomas Carney, Respondents
Superior Court Case Number: 15-2-00660-2

The following documents have been uploaded:

- 805819_Report_of_Proceedings - Volume 1_20200306100107D1054744_0650.pdf

This File Contains:

Report of Proceedings - Volume 1, Pages 1 to 70, Hearing Date(s):
01/14/2011;02/11/2011;03/18/2011;04/01/2011;04/22/2011;05/20/2011 *Report of Proceedings Total Number of Pages: 70*

The Original File Name was reid v carneyPDF.pdf

A copy of the uploaded files will be sent to:

- bianchi@laser.com
- jeansdominoeffect@gmail.com
- knudsen@laser.com
- nathanmcallisteratty@gmail.com

Comments:

Sender Name: Rhonda Jensen - Email: rjensen@co.whatcom.wa.us
Address:
300 Grand Avenue
Bellingham, WA, 98225
Phone: (360) 778-5608

Note: The Filing Id is 20200306100107D1054744

Exh. 2(a)

Lubin, Hillary <Hillary.Lubin@courts.wa.gov>

Thu, Mar 5, 2020 at 12:24
PM

To: jean reid <jeansdominoeffect@gmail.com>

Jean,

As I've mentioned, it is not court procedure to correspond via email. If all transcripts are not filed by end of business tomorrow, the case will be routed to the Clerk for dismissal in accordance with his previous ruling.

Thank you,

Hillary Lubin

Case Manager, Court of Appeals Division One

600 University Street

Seattle, WA 98101

206-464-5371

EX 3

Fwd: VR to appeal court

Inbox x



jean reid <jeansdominoeffect@gmail.com>

Fri, Mar 20, 2:11 PM (3 days ago)

to me

proof the court reporters knew 28th deadline

----- Forwarded message -----

From: jean reid <jeansdominoeffect@gmail.com>

Date: Thu, Mar 5, 2020 at 10:41 AM

Subject: VR to appeal court

To: Rhonda Jensen <RJensen@co.whatcom.wa.us>, Wendy Raymond
<wraymond116@gmail.com>

Hillary at appeal court phoned and said none of the VR have been received by them . Wendy filed by the 28th and the ones we ordered from you Rhonda have not been sent.

they are threatening to dismiss my case because they were not received by the 28th of Feb.

please tell me what is going on. Also she said 8 hearing dates VRs are missing from the statement of arrangements so if there is a conflict as to what we ordered and paid for vs what was on the SOA please let me know what is needed.

Ex 3(a)

IN THE COURT OF APPEALS FOR THE STATE OF WASHINGTON
DIVISION I

3	= = = = =)	
4	MICHAEL REID and JEAN COLLINS)	
5	REID, individually and on behalf)	
6	Of their marital community,)	
7	Appellants,)	COA No. 80581-9
8	vs.)	
9	JULIE CARNEY and THOMAS CARNEY,)	Cs. Nos. 10-2-03289-1
10	individually and on behalf of)	15-2-00660-2
11	their marital community,)	
12	Respondents.)	Court Reporter Affidavit

- 13 1. I am a court reporter employed in the trial courts
- 14 of Whatcom County.
- 15 2. I certify that I reported proceedings in this matter.
- 16 3. Appellant Jean Reid filed with the superior court a
- 17 statement arrangements for this matter in November 2019.
- 18 In December 2019, I received a copy of the statement of
- 19 arrangements via email. Subsequent to its receipt, there
- 20 were communications about incorrect dates listed, as well
- 21 as Ms. Reid's desire to add additional dates. I was told
- 22 her attorney would be filing an amended statement of
- 23 arrangements.
- 24 In past experiences with the Court, an incorrect or
- 25 partial filing of verbatim report of proceedings dates was

EXH 3 (b)(1)

1 discouraged. So I waited for further contact from Ms. Reid
2 or counsel to provide an amended statement of arrangements
3 which I did not receive.

4 4. On February 28, 2020, Wendy Raymond, another reporter
5 listed on the statement of arrangements, contacted me to
6 request I file some verbatim reports of proceedings for her
7 as she was having difficulty with her internet connection.
8 As it was after 4:30 p.m, we quickly exchanged information,
9 and I filed them for her. We had no conversation or
10 discussion about the case, or that February 28, 2020, was a
11 deadline date previously given by the Court.

12 5. I do not know yet the reason, but there had been a
13 communication failure in that it was not communicated to me
14 that on January 24, 2020, the Court had issued a notation
15 ruling ordering that if all verbatim reports of proceedings
16 were not filed by February 28, 2020, the case would be
17 dismissed.

18 5. On March 5, 2020, I received an email from Appellant Jean
19 Reid inquiring why the verbatim reports of proceedings were
20 not filed, and forwarding to me an email from Hillary Lubin
21 at the court of appeals stating that they must be filed
22 before close of business on March 6, 2020, "or the case
23 would be routed to the clerk for dismissal." The verbatim
24 reports of proceedings were filed 10:16 a.m, March 6, 2020.
25 I, therefore, relied on the information in Ms. Lubin's

EXG 3 (6) (2)

1 email as the only communication of the filing due date.
 2 6. All verbatim reports of proceedings have now been filed and
 3 received by the Court.

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25

Dated: April 1, 2020

Therese A. Jensen

Court Reporter

(360) 778-5608

EXH 3 (6) (B)

DONNA JEAN REID - FILING PRO SE

July 09, 2020 - 1:12 PM

Filing Motion for Discretionary Review of Court of Appeals

Transmittal Information

Filed with Court: Supreme Court
Appellate Court Case Number: Case Initiation
Appellate Court Case Title: Michael Reid and Jean Reid, Appellants v. Julie Carney and Thomas Carney, Respondents (805819)

The following documents have been uploaded:

- DCA_Motion_Discretionary_Rvw_of_COA_20200709130643SC563783_1308.pdf
This File Contains:
Motion for Discretionary Review of Court of Appeals
The Original File Name was scanned appeal to supreme docs.pdf

A copy of the uploaded files will be sent to:

- bianchi@laser.com
- knudsen@laser.com
- nathanmcallisteratty@gmail.com

Comments:

i put the motion and exhibits all as 1 doc

Sender Name: donna jean reid - Email: jeansdominoeffect@gmail.com
Address:
p o box 2178
blaine, WA, 98231
Phone: (360) 223-5623

Note: The Filing Id is 20200709130643SC563783