

No. 66352-6-I

COURT OF APPEALS, DIVISION I
OF THE STATE OF WASHINGTON

MARLA KRESS and JERRY KRESS, husband and wife, and the marital
community composed thereof,

Appellants,

vs.

THE STATE OF WASHINGTON; TRI-STATE CONSTRUCTION,
INC., a Washington corporation, and RICHARD MOBLEY and JANE
DOE MOBLEY, husband and wife and the marital community composed
thereof,

Respondents.

FILED
COURT OF APPEALS DIV. #1
STATE OF WASHINGTON
2011 JUN 15 PM 1:35

OPENING BRIEF OF RESPONDENT RICHARD MOBLEY

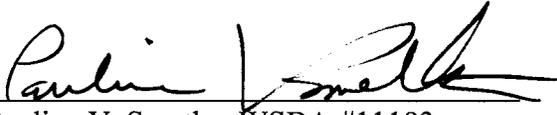
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Respondent Richard Mobley submits this response to the appeals filed by Appellants Marla Kress and Jerry Kress, Respondent/Cross Appellant State of Washington, and Respondent/Cross Appellant Tri-State Construction, Inc.

Respondent Mobley does not oppose Appellants Kress' appeal, and supports their appeal for all of the reasons, argument and authority set forth in the Opening Brief of Appellants Kress dated April 28, 2011.

Respectfully submitted this 15th day of June, 2011.

HELSELL FETTERMAN LLP

By 
Pauline V. Smetka, WSBA #11183
Attorneys for Respondent Mobley

PROOF OF SERVICE

The undersigned, declares as follows:

I am now, and at all times herein mentioned was, a citizen of the United States, a resident of the State of Washington, and over the age of eighteen years. I arranged to have the foregoing **OPENING BRIEF OF RESPONDENT RICHARD MOBLEY** served in the manner indicated on June 15, 2011 addressed to the following:

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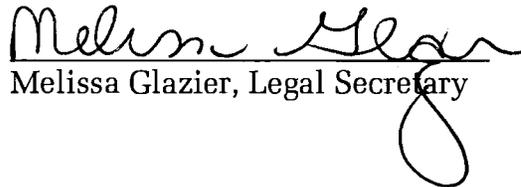
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I declare under penalty of perjury under the laws of the
State of Washington that the foregoing is true and correct.

Dated this 15th day of June, 2011, at Seattle, WA


Melissa Glazier, Legal Secretary

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