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Supreme Court №.

SUPREME COURT

OF THE STATE OF WASHINGTON

S. Khakimov

Appellant,

v

N. Khakimova,

Respondent,

The appellant's response to the Respondent's Brief

1. The appellant received a Respondent's Brief without first title page on the seven pages. Respondent's Brief begins with the words: "COME NOW respondent and via her attorney of record submit her Respondent's Brief". This is the appellant shall notify the Supreme Court, because to the Supreme Court may have been sent a different version of Respondent's Brief (with a cover sheet, on large sheets).

The appellant's response to the Respondent's Brief	APPELLANT PRO SE

ORIGINAL

The appellant reading the Brief and officially emphasizes that the document suffers inaccuracies, contradictions and apparent fraud. The attorney cannot even Brief truly describe the situation.

2. At the very beginning of its Brief the attorney writes about Motion in Limine. The appellant points out that after the apparent opening of abuse and fraud by lawyer N. Litchev, she began to write (in his papers), that the all documents belong to the respondent. So in the brief the attorney wrote: "At the onset of the trial, the court granted Nigora's motion in limine, excluding appellant exhibits and witnesses for intentional failure to comply with KCLR 26, 4, and intentional failure to comply with the pre - trial scheduling order of May 21, 2012. CP No. 23A "(1:11-14). . However, the motion was not made up of the respondent, she has no idea about motion, and cannot know about legal intricacies of deception. Therefore, the statement "Nigora's motion in limine" is an attempt "throw a switch responsibility" from itself (from attorney) to the respondent. The respondent is not a lawyer, and she has no idea what the motion in limine, as it is made and that it is specified. In addition, all documents from the appellant's received directly the attorney, not the respondent. And the attorney committed an act of fraud in court officially declaring that received no exhibits from the appellant. All the exhibits were obtaining counsel at the time (according to the pre-trial order).

3. The attorney writes: "exhibits and witnesses for intentional failure to comply with KCLR 26, 4, and intentional failure to comply with the pre-trial scheduling order of May 21, 2012. CP No. 23A". Roughly similar interpretation she has used in motion in limine.

In fact, this is just a declaration, without providing any documents and evidence. The phrase "intentional failure to comply with KCLR 26, 4" does not carry nor any meaning, is a fraud. The attorney to date cannot lead any evidence. The appellant submitted to the court copies of correspondence with the lawyer (e-mails), where it is clear that the attorney received all exhibits in time. All activities of attorney are reduced to spreading common, but loud remarks and phrases. Behind this façade hides an ordinary deception. Many part of fraud the attorney had not even been thought out to the end (so it is easy and obvious to find its error).

4. Also is legally erroneous are the statements of counsel, that the "intentional failure to comply with the pre - trial scheduling order of May 21, 2012". In the first, "pre-trial scheduling order" was drafted another judge-Judge Suzanne Barnett. The trial is conducted totally different judge-Judge Joan E. DuBuque. Trial has been moved for a few days later. That is actually Judge Joan E. DuBuque hit the entire trial scheduling order. The Judge Joan E. DuBuque had no right to take a decision in accordance with the "pre-trial scheduling order", which was drawn up not by her (and made Judge Suzanne Barnett), and the timing of the trial was to change by the Judge Joan E. DuBuque

5. Given the helpfulness to the court of relevant records in dissolution proceedings, however appellant believes is not reasonable action the trial directed to exclude all of appellant's exhibits on the basis of the procedural violation (this thought-suggestion, since virtually all of the exhibits were filed at the time and the due date).

Even assuming that the appellant violated the terms of dissolution proceedings, then the act of a judge could give attorneys some additional time to review the proposed exhibits and perhaps a reprieve from the deadline for providing his own.

It should be emphasized that none of the exhibits offered by appellant were irregular. They were the type of financial records typically provided and needed in a dissolution trial.

Also, the attorney could have objected to the exhibits offered by appellant at the time of trial on the basis of "noncompliance with the rule". The trial court might have denied admission of some of the exhibits. This move would be more reasonable and would eliminate the fact of fraud from the attorney. The applicant points out that this is just the thought of reasoning, since all exhibits were filed by appellant in time (the court refused to adopt them only through fraudulent action of attorney).

6. CR 46 provides that "Journal exceptions to rulings or orders of the court are unnecessary; but for all purposes for which an exception has heretofore been necessary it is sufficient that a party, at the time the ruling or order of the court is made or sought, makes known to the court the action which he desires the court to take or his objection to the action of the court and his grounds therefor; and, if a party has no opportunity to." Appellant filed Objection on Motion in Limine and voiced objections. However, the judge did not make "the Journal exceptions" and did not even have neither a decision on the motion of the applicant (denied or granted)

7. Counsel argues in the Brief, that "the trial court does not abuse its discretion by excluding evidence as a sanction when there is a showing of intentional or tactical nondisclosure, willful violation of a court order, or other unconscionable condition". The assertion of the attorney that "there is a showing of intentional or tactical nondisclosure, willful violation of a court order" is a fiction and a fraud, not having a legal basis. Attorney cannot document their pretentious statement.

First, appellant was provided to the court and the respondent 'counsel all exhibit IN TIME, in accordance with the pre-trial order (despite his illness, lack of financial and other a capacity, to copy, scan, and so on). See Index, P 197, 198 et seq. The appellant has filed in trial nearly two and a half times more the evidence and exhibits than the respondent.

Second: What facts "tactical nondisclosure, willful violation" is talking attorney? Can she soberly give the Supreme Court an examples? Can she refute the fact that the all respondent's evidence she receives a pre-trial period (receipt through e-mail)? In Motion in Limine, in the Trial, and any subsequent documents (including the Respondent's Brief) counsel did not provide evidence. We can see just demagoguery, makes extensive, general statements. She has no public documents and evidence to back up his words.

Third, the facts show that directly apply the term "convicted of premeditated and tactical nondisclosure information" can be easily applied to the respondent - for premeditated and tactical nondisclosure income.

Fourth: The appellant (in trial, during the testimony) provided to the trial documents about illness in the pre-trial period (Index, P 173-174). If a person is sick, it is natural to perform any cases delayed because the patient is unable to work. However, these documents were not accepted by the judge, because attorney began shouting "OBJECTION". This is discrimination rights of the appellant (intentional and malicious). In essence, the lawyer in the trial for no reason repeatedly shouting the word "OBJECTION" (probably she cannot understand until the end of self-motifs and reason for this strange behavior).

8: The Attorney wrote that "The trial court held a hearing on the motion, wherein the court considered evidence and authority provided by both counsel and appellant, found that appellant's non-disclosure and non-compliance with the court order was willful and granted the motion on the record prior to the trial "(4: 4-8). This statement is not correct, since the very beginning of the Judge made a false statement that allegedly received only a document - Motion in Limine from attorney, but did not receive from appellant (please listen to the audio recording). The applicant then tried to explain the situation to the judge and said that he filed Objection to the Petitioner motion in Limine (Index, P 30-32). The judge interrupted the applicant after about a minute and said, "You know, I am granted Motion in Limine", because the appellant failed to disclose the information (please listen to the audio recording). This abuse of the judge, because in fact everything was different, and the applicant has submitted all the documents on time and in an amount more than double the defendant filed.

9. Motion in Limine the attorney filed only in the day of the trial (thus, it clearly violated the terms of pre-trial order). Perhaps that's why the document drawn up by the letter "A". This raised the question of possible assistance in the falsification of a third person (the person in charge of the court). If the attorney filed a document in time, she would be able to present a certificate wherever clearly specified - time, date, month, year of filed Motion. One of the absence of clear and simple of paper (certificate) from the attorney shows that the Motion in Limine was filed in court much later, and the date of receipt of the document has been falsified (with no observance of pre-trial order) .

Attorney N. Litchev in the Brief could not explain the reason for such a late filing Motion to the court, and was able to deny the fact of falsification by the letter "a" (which actually proves its existence).

10. The attorney wrote that the appellant "failed file a written response to the Motion in Limine and the e-mail correspondence was not before the court" (4:12-13). This statement is not correct. The appellant "Objection to the Petitioner motion in limine" was to file in April 23, 2012 (See Index 30-32). In addition the attorney also contradict her own statement in the Brief "The trial court held a hearing on the motion, wherein the court considered evidence and authority provided by both counsel and appellant, found that appellant's non-disclosure and non-compliance with the court order was willful and granted the motion on the record prior to the trial "(4: 4-8). If the applicant has not submitted Objection to the Petitioner motion in limine, then how could the court "considered evidence and authority provided by both counsel and appellant" (4: 4-8)? This is real contradiction in the statements of counsel.

11. Also, of the statement in Brief of the counsel that "The e-mail correspondence between counsel and appellant cited (with errors and omissions) in his Appellate brief has no bearing on whether the trial court abused its discretion in granting the motion" (4 :10-11) are absolutely not significant. The appellant believes that the statement "... with errors and omissions", there is another "empty chatter" of the attorney (without providing detailed evidence). According to the applicant if the lawyer has the appropriate license, she must clearly understand the distinction between acceptable and base statements and the provision of relevant evidence.

In April 23, 2012 the applicant was filed in the court the Motion in Linime about Exhibits of Petitioner (Index 28-29). This document also was sent to the attorney N. Litchev. However, the trial judge ignored the document, which showed that judge had from the first minute trial one-sided approach to the case (in favor of the attorney and respondent). Appellant's Motion in Linime about Exhibits of Petitioner (Index 28-29) also shows that respondent's counsel submitted to the court "fragmentary financial information" in the exhibits, which in fact is hiding the true financial status of the defendant.

12. Against the backdrop of the above, it seems hypocritical assertion that "Furthermore, the correspondence only confirms that counsel had no data from appellant of any kind regarding his financial status and claims as late as April 6, 2012, with less than three weeks remaining before the original trial date ". The attorney in his letters (e-mail) deliberately misrepresented existing facts. For example: mutated name of the respondent (petitioner). The attorney tried to constantly threaten to appellant by

financing sanctions. Reason for this was not, but the actions of attorney probably had some further target. This statement is absolutely hypocritical against the fact that the counsel self simply hid from the appellant and the trial (also from the Supreme Court) from April 2012 to present time, the true financial position of the respondent (see MOTION on RELIEF FROM JUDGMENT OR ORDER (Rule 60)).

13. The attorney says "... in his Appellant's brief stated that he" did not planned [sic] to call witnesses, because the issues of credit card and debt, common property on the United States known [sic] only to the appellant and the respondent. "Appellant's Brief 13:16-19. Thus, appellant suffered no prejudice" (4:1-6). However, the applicant in Brief writes about deception and contradictions of a lawyer who requested the deletion of the witnesses of the applicant (see MOTION about fraud in respondent attorney Motion of Limine)

The attorney is statement in the Brief that "Thus, appellant suffered no prejudice" (4:1-6) are hypocritical and blasphemous. The applicant wrote and spoke repeatedly that witnesses his sister have the right to inherit property in Uzbekistan and their rights have been discriminated against. The Respondent has no rights to the house and condo in Uzbekistan, as this property bought the father of the appellant. Respondent pursued selfish purpose and through deception tried to take possession of the personal property of the appellant.

Statement of attorney also shows that it is not true comments LCR 26.

In this case works comment LCR 26 "Discovery, Including Disclosure of Possible Witnesses and Protective Orders". Official Comment at LCR 26 states: "This rule does not

require a party to disclose which persons the party intends to call as witnesses at trial, only those whom the party might call as witnesses. The only exception is when the party calling a witness could not reasonably anticipate needing that witness before trial ".

In this case, the spread position - "The only exception is when the party calling a witness could not reasonably anticipate needing that witness before trial". However, after granted Motion of Limie the judge usurped the appellant's right to call witnesses in trial in accordance with the LCR 26, discriminating against the rights of the whole big families (of the applicant and his three sisters).

14. Attorney deceptively writes that "Lastly, appellant failed to submit to the trial court his objections regarding the final orders drafted by counsel." The applicant pays particular attention of the court to the obvious deception attorney N. Litchev (fraud of attorney is global scale), because the appellant's objections were aimed to the judge and the attorney in time (Index # 166-167). The appellant notes that prepared a response within three days after of receipt of draft from attorney.

15. The attorney wrote: "The court granted the attorney's fee award to respondent for appellant's intransigent behavior prior to and during the trial, and thus no financial declarations of the parties were necessitated. Appellant failed to object to the amount of the fees requested by counsel and may not bring this issue now on appeal. "Appellant surprised how easily deceive the Supreme Court lawyer. First: the appellant objected on attorney's fee award in all of its post-decision documents, also in Objection to draft CDC. The appellant openly about it also said the judge. The appellant believes that the

attorney N. Litchev is still brazenly, without fear of the consequences of deceiving the US judicial system.

Appellant argues that the inaccuracies, withholding information about income, fraud of attorney had an impact on the substantive legal and factual provisions of the summary judgment.

That the trial granted the attorney's fee without the financial declaration is a violation of the law. In addition the respondent also significantly understated their income before the court and hid the true state of affairs. A court abuses its discretion when it "applies the wrong legal standard, or bases its ruling on an erroneous view of the law." Gildon v.Simon Prop. Group. Inc .. 158 Wn.2d 483, 494, 145 P.3d 1196 (2006). A trial court must sufficiently explain the basis for its fee award to permit appellate review. Mahler v. Szucs, 135 Wn.2d 398, 435, 957 P.2d 632, 966 P.2d 305 However, the court did not do it.

16. In Brief attorney says: "The parties had a single family residence and a condo in Uzbekistan. Both parties and their adult children testified about ownership of, and the parties' claims regarding the real property. The trial court made its credibility determination and awarded the single family home to appellant and the condo to Nigora under the authority of Marriage of Kowalewski 163 Wn.2d "Firstly: the case of Kowalewski has absolutely no any relation to this case, so it is useless to even discuss. Secondly: The absurd is the assertion the attorney that "their adult children testified about ownership of, and the parties' claims regarding the real property", as the house was bought for about thirty years before the birth of children, and Condo was bought by the father of the applicant, when children are not yet able to walk and talk (they were

babies). As unborn children or infants can testify that it? Such oversights and errors the lawyer N. Litchev very much.

For example legally incompetent attempts impose to trial the questions "home repairs" allegedly made by the respondent's parents. This is a fraud. Moreover, there was no claims on the part of the respondent's parents. And a licensed attorney before claims property issues in trial must know the law, "the statute of limitations." In the trial attorney claims the events of twelve-year-old. All of these actions are a lawyer again and again to support their fraudulent intent, as well as a gap in the understanding of the elementary laws.

The appellant has repeatedly said that there are no documents, there is no evidence from the defendant on real estate and other issues. In addition the applicant has repeatedly claimed that the respondent in the trial never said that the real estate is common property (this is false declared in trial and wrote in the trial brief only the attorney). The appellant requests that, in the event an objection on these facts, the lawyer to submit its evidence to the contrary, based on excerpts from the verbatim report. The counsel has not yet been able to refute the allegations of the applicant, because the facts remains facts.

The attorney in the second and third day of the trial saw the documents the applicant's real estate property of the abroad. In fact the counsel in cahoots with the judge took all measures that these documents have been removed from the case (the second, the third day of trial), and did not appear as exhibits (they were marked in the documents of the trial as diagrams). These illegal actions of the lawyer and the judge dealt a real detriment

of the rights of the applicant. The applicant felt a sense of helplessness and despair. In fact, an attorney and the judge are a fact of violence against of the personal real estate property of the appellant. Their actions should be promptly stopped from higher, supervisory authorities.

The attorney wrote that "appellant failed to provide evidence of abuse of discretion of the award. Appellant argues that the real property in Uzbekistan is his sole and separate property despite 23 years of marriage". Instead of generalities about the marriage, for attorney would be better presented at least some evidence or his reasoning. The appellant reiterates that the real estate was purchased by the father of the appellant and not the common property, so cannot be separated. A lawyer must respect the institution of private property, and do not expose it to attacks and violence.

The attorney said so, that the appellant has not demonstrated that real estate personal. This is a hypocritical statement of attorney. The first: real estate is personal property, it is, and will remain, and he had not submitted to the court claim the division (therefore not required to prove). Illegal claim about real estate filed the respondent. She actually lied to the court. This is her claim and that she has to prove the accuracy of their claims. The applicant should not prove anything. He has documents proving his ownership. And no one has the right to annul it there. In addition lawyer illegally blocked the view of the court of original documents.

17. The participation of the judge in this Case was actually a formality. Because she did not give anyone conclusion on any fact contradictions that have been in court. The judge did not pay attention to the obvious fact of advantages position of the appellant.

Advantages of the appellant were in concreteness of his testimony, in a clear argument expressed by them all the facts. During the interrogation of the respondent's, the applicant has shown inconsistency of respondent's position. The judge did not give a serious conclusion to evidence (exhibit) of the respondent, which are just fragmentary documents (showing a fragmentary picture). The judge did not give the conclusion of the institute of "registration" (called "propiska") and many other problems and contradictions. Probably in the first minute of the trial the judge knew that she would take a decision in favor of the lawyer. Also the judge is not realizing the situation has gone on about the apparent provocations of the attorney. The counsel said that the property is a joint. This is a real provocation, real deception of the court.

18. The decision on the division of real estate property not is the matter of judicial discretion and the discretion of the trial court (without regard to the question ownership and the establishment of the true owners). Questions of separation of real estate property require a clear definition of questions: what kind of property and who owns the property. This issue is solved by the parties through to provide of the official documents (in a dispute).

In addition raised for consideration by the attorney in trial questions about the real estate property does not have a factual and is not supported by the evidence. All the attorney arguments about the common property (real estate) is just only "empty chatter".

The decision on the division of real estate property is abroad taken in violation of the current legislation, as in case is no reference to clearly controlled by settled law. Link to

case right (case Kowalewski) is redundant and erroneous, since the subject matter of the dispute and of this case does not correspond to the present case.

In the arguments of counsel for real estate issues there is no consistency and logic.

In this regard, the applicant has requested the Supreme (appeals) court to pay special attention to the following questions:

A.. On the basis of what documents the lawyer argued in court (and in her of the trial brief), that real estate is a common property (respondent in trial never told about it)? In this regard whether the attorney to refer to the trial testimony of the respondent, where she'd said about this matter (about common ownership of real estate)?;

B. The attorney in trial saw the official documents of the appellant of its ownership of the real estate in Uzbekistan. Why the lawyer did asked the court not to accept these documents? Whether it is a fact of discrimination of the rights of the appellant?

C. Judge of Washington State in the decisions of real estate for abroad is guided by laws which countries? If the laws of the State of Washington, said laws (the laws of the State of Washington) have a force to foreign countries? If the same laws of a foreign country, then the judge has a right to take a decision in accordance with them (despite the fact that her right to have a clear understanding of the territorial limitation of its powers).

D. Judge of the State of Washington has a right to deprive an individual of his right to private property (to withdraw it from the ownership) and transfer it to person who is not the owner under the law? Such a decision whether acts of confiscation of personal property? Is it legal in terms of the U.S. Constitution?

The appellant requests a lawyer and the defendant to answer the above questions directly and not ambiguous.

19. The appellant also asks the Supreme Court to examine the question the likely impact of a third person on the outcome of the case and make a decision. Many of the facts of the case are absurd, illogical, contradictory and manifestly illegal. First - change of judges, before the start of trial. Change without explanation. No one did not declare the impeachment of the original judge. Why was it made? Why Judge Joan immediately took the side of the respondent? Second - granted Motion in Linime, in total disregard of the documents submitted by the applicant. Why the judge did grants the Motion in Limine with neither any evidence? The judge actually re-read the document a lawyer and decided in favor of the lawyer. Third - Motion entered in the register of the Office of the High Court in hindsight, with the addition of the letter "A". Not the exception that this contributed to the judge herself. Fourth - the judge autocratic shares the personal property of the appellant, not even by requesting documents on these issues. Fifth - the judge is trying to hide the presence of motions from the appellant. Six - Why such privileges are given to the respondent and her attorney? Seventh - Why the judge fearlessly violate the rights of the applicant and at the same time the laws of the State of Washington (without fear of consequences)? The applicant urges to check the version of influence on the outcome of the third party in the case (perhaps patron's defendant). Or otherwise logically explain clearly illegal actions of the judge and the facts of falsification of data.

20. The Appellant respectfully requests the Supreme Court to seek an opportunity to request a verbatim report of the proceedings (if Supreme Court have questions and court want to review further the facts). This request is reasonable, since in this case we are talking about the judge's abuse. According to the appellant any attempt to "protect the honor of the uniform," or attempts to hinder the process (through the creation of unbearable demands to the appellant to pay for obtaining documents and verbatim report) is not acceptable and is not legal. The entire judicial system of the state of Washington is one whole, well-functioning mechanism, and Requests for documents from one substructure to another is almost devoid of any financial expenses. Also, if the actions of the judge abused his power will go unnoticed, but in future it may turn out disastrous consequences for the judicial system as a whole.

21. This case shows that the rights of Pro Se in the trial is vulnerable. Pro Se can be easily tricked into trial. Using the "pitfalls" of procedural law (and not knowing their subtleties of the Pro Se), the civil rights of Pro Se can be very easily subjected discriminated (on the part of the judge and opposing counsel). In case if the rights of Pro Se is slighted in trial, without attorney is difficult to defend rights and to show all the infringement made during the trial. Since it is often the "trust" to the judge a reason to ignore the complaints Pro Se. Such stereotyping of thinking can sometimes be the basis for the iniquity of abuses of power on the part of the local judges. Therefore, the applicant asks to make an addition to the procedural law, which would not equivocally fixed the duty of the judge to be the guarantor of the rights of Pro Se. According to the applicant must be affixed in the law that the judge without bias and emotion without showing contempt must

patiently explain in detail all the rights of Pro Se; making sure that the Pro Se understood the essence of the matter, the judge shall proceed to further stages in the process. All documents and motions filed by Pro Se the judge must accept, consider and write a detailed explanation and justification of the decision (in the case of Pro Se all the judge's decision must be in writing).

22. The appellant requests the Supreme Court to amend the cases laws, which clearly would have been told that the attorney "has not right to mention in pre-trial periods to the opposition about attorney's fees (it to be considered as blackmail); the attorney has not right to fabricate the tide in favor of his client; the attorney cannot change the statements and testimony of his client (the lawyer has no right to make statements in court are not supported by his client); the attorney is personally liable for fraud under the law ". In addition it is desirable to formalize the rule that the counsel is obliged to give opposition party signed application (if opposition party is Pro Se) that attorney will not exceed powers, will not blackmail and intimidate; that will not use information received from opposition for their own purposes; and clearly indicate to the opposition side (Pro Se) that Pro Se if necessary may appeal the actions of the attorney through the motions in the case of illegal actions of opposing counsel. This rule will prevent to put barrier to the facts of deception, threat and blackmail in respect of Pro Se (by opposing counsel).

Violation of the rule of law and the adoption of an unfair decision in the present case are obvious. First: the separation of personal real estate abroad, as a general. The attorney and the respondent did not submit to the court nor any evidence and documents.

Second, the judge makes financial decisions in favor of the respondent in the presence of fraud in the testimony of the respondent's actions and counsel. Third: the court granted the attorney's fee award to respondent without having a financial declaration. In this case, the true financial income defendant concealed from the court. Virtually all court decisions taken in violation of the rule of law and discrimination civil and constitutional rights of the appellant. In accordance with RULE 18.14 MOTION ON THE MERITS (a) The appellate court may, on its own motion, affirm or reverse a decision or any part thereof on the merits in accordance with the procedures defined in this rule.

Based on the above appellant requests:

1. Reverse the decision of trial, as not legitimate, as it was taken through fraud attorney and the defendant (appellate court motion on the merit);
2. Recognize that in the trial were the rights of the appellant were discriminate against and violated;
3. Recognize that the lawyer N. Litchev applied the illegal action in all periods of the consideration of this case. Recognize that the attorney then cannot ensure to participate in the future in this case;
4 . The Appellant respectfully requests the Supreme Court to seek an opportunity to request a verbatim report of the proceedings (if Supreme Court have questions and court want to review further the facts). This request is reasonable, since in this case we are talking about the judge's abuse.

5. Recover from the opposing party (the respondent's attorney) compensation for non-pecuniary damage.

Respectfully Submitted on July 14, 2013

S. Khakimov

Pro Se

OFFICE RECEPTIONIST, CLERK

To: Shukhrat KH; Natalia Litchev
Subject: RE: The appellant's response to the Respondent's Brief

Rec'd 7-15-13

Please note that any pleading filed as an attachment to e-mail will be treated as the original. Therefore, if a filing is by e-mail attachment, it is not necessary to mail to the court the original of the document.

From: Shukhrat KH [mailto:s_khakimov@hotmail.com]
Sent: Sunday, July 14, 2013 7:46 AM
To: OFFICE RECEPTIONIST, CLERK; Natalia Litchev
Subject: The appellant's response to the Respondent's Brief

To Susan L. Carlson
Supreme Court Deputy Clerk (send by e-mail only)

Copy: Natalia Litchev (send by e-mail only)
600 108 Ave NE Suite 1002
Bellevue, WA 98004-5129

Dear Susan L. Carlson,

In attachment **The appellant's response to the Respondent's Brief**

Thank you,
Shukhrat