 72396-1

REPLY BRIEF OF APPELLANT

COURT OF APPEAL

DIVISION - 1

Case No

723961-I

Appellant:

Shaw Rahman,

V

Respondent:

WA State Department of Employment Security.,

Shaw Rahman
4739 university way NE #1422
Seattle, WA 98105
T 6047203964

Contents

DEFINITION- OXFORD: 1
I. INTRODUCTION 1
II COUNTERSTATEMENT OF THE ISSUES: 7
III. COUNTER STATEMENT OF THE CASE: 7
IV. ARGUMENT 9
V. Conclusion. 20

RULE OF LAW, BLACK LETTER LAW, STATUE, & CASE LAW

Ashcrof v Iqbal
Breuer v. Presta
Cheek v Emp' Sec Dept
EEOC V Boeing
Forseth V. city of Tacoma
Lemond v Dept of Licensing
Landstar Inway Inc v Samrow or Mayer v Sto Indus Inc.
MacDonanel Douglas
Medina v Pub Util Dist No 1 of Benton County , 147
Miller 885,
Milligan 110.
Orwick v Seattle ,103
Petta V Dept. of Labor & Indus, 68
PERC , 116
Riply v. Lanzer.
Ridgewater Props v. Starbuck 1982
RCW 34.05
RCW 49.60
RCW 34.05.470
Smith v Sahnnon,
Santore ,28
state v. Dye
state v Rohrich.
Shafer v State.
Sprint Spectrum LP v. Dept of Revenue
Stegall v Citadel Board Co holds.
Sunnyside Valley Irrigation Dist, v Dickie 149 Wn 2d 7873 ,879,73
Towmbly v Bell Atlantic.
WAC 192-04-210,
Wilcox, v Lexinton Eye Inst.
42 USC

The plaintiff asserts and relies the reasoning based on case law below, for page 1-22 of this pleadings "substantial evidence, which is evidence sufficient to persuade a fair minded person of the truth of declared premise". Ridgewater Props v. Starbuck 1982

DEFINITION- WORK (OXFORD):

Activity involving mental or physical effort done in order to achieve a result.

I. INTRODUCTION

Court of appeal's , obligation is to provide justice based on facts, beyond procedural technicalities, de no vo , for causues of actions from the beginning of limitations period of factual allegations . The facts of this case , under appeal are the followings:

FACTS OF APPEAL FOR BENEFIT DENIAL FROM ESD

AGENCY LEVEL- DEPRIVAL OF JUSTICE

(1) Was Plaintiff's denial of benefit at the agency level , by Judge Nacarato's order unlawfully when Plaintiff filed his claims within the defined WEEKLY claiming period (RCW 50.04.360) and per agency screen shot of online web based-form(CP 125), providing scope of weekly defined dates of number of (7)days considered a claiming period, for each of those claiming period when he, submitted his un approval of time sheet to 4ci and Deloitte.

(2) Deloitte management disputed to approve time sheet on time and lingered on change of approver of time sheet throughout the entire period of employment, in contractual agreement (42 USC/ WAC 192) violation.

(i) in dispute [appendix-1, CP page 9, the reported earnings [columns "verified earnings"], paid to the plaintiff, "within the weekly claiming period" are false/fraudulent , EEOC v Boeing applies]

(ii) with statement, that the work product was something that they cannot show/deliver to the client, when there were no such client (Intel's) formal requirement yet given to him and the entire course time of employment was to teach /consult Deloitte staff and Leads, for a potential solution, yet , -be confirmed by Deloitte, for what specific formal requirement, - to solidify, - in a formal deliverable ,from the Plaintiff or were not even given to him. Employer excused on hours of work and "work": - defined as "mental or physical effort done in order to achieve a result". When per PERC , 116 & Santore ,28 , - actual compliance was executed with "reasonable" efforts within timeframe of "week-(RCW stated earlier)-ly claiming period, by employers act of disapproving within the claiming period that violated the contractual agreement, to state any "specific" "numbers of hours"[quantity] for "work[def]" performed[Plainff delivered deliverable and filed his timesheet accordingly for approval , per contract, as stated earlier.

4ci and its client Deloitte's proferred explanation is therefore unworthy of credence and a pretext, thereby false/fraudulent , holding on EEOC v. Boeing.

Under the above two paragraph Plaintiff's benefit was unlawful denied with fraudulent statements by Judge Naccarator, at the agency level, based on the testimony as direct evidence with this appeal., that resulted in a judicial error from the agency level all the way up thru towards this appeal pleadings. Reasons for de no vo review persists clearly.

Plaintiff's benefit was denied unlawfully at the ESD level, for Judge Naccaroto unlawful and intentional judicial conduct of bias or appearance of bias, when Plaintiff disclosed all matters appropriately.

Plaintiff is entitled to justice and benefit at the agency level manifested injustice towards him for denial of unemployment benefit.

Plaintiff ,within 30 day of final order from agency couriered with a return fedex envelope(as stated in the opening appeal brief) to Superior court for filing , that was not properly returned to him with the returned fedex envelop, to Vancouver, BC, rather , superior court claims,to have returned it to unauthorized Redmond , WA address where Plaintiff did not live and had evacuated because of benefit denial for rent payment, 16596 ne 84th ct 4a Redmond WA- this information was obtained by calling superior court clerk's office and redirected call to

Juvenile section , a representative by name Sophie, informed from looking into the record that the package was received on the 7th jan 2014, and returned the next day but she retained the fedex envelope tracking , in courts record, as she quoted to Plaintiff the return able fedex envelope tracking number from her data record of the package received at the Superior court. Therefore the clerical error in returning the package properly to Plaintiff cannot be attributed a failure on the Plaintiff's part, while plaintiff was out of country for job search/ interview and properly took measure for superior court to correspond to him by listed phone number on tracking or properly addressed envelope. The cause of return per Sophie -from the record , was the appeal document , did not have a cover sheet, as stated in the appeal. Therefore there existed a receipt of the arrival of the appeal in the court's record that is within 30 day of the final order of the agency, from Dec 13, 2013. Superior court erred in proper return of the envelope back to Plaintiff overseas using the paid envelope. In the superior court pleading the State Attorney had been shifted burden with by plaintiff, to under MacDonald Douglas, 411 that this information existed and to verify. Plaintiff later on physically went to superior court to validate. Presiding judge, had not order to request a verification for from the State, under MacDonnald Douglas, as it remained in the pleading in king county superior court. Superior court has appellate jurisdiction over facts of the case, de no vo, , application of WAC and

WA Administrative Courts violation (under ALR2, ESD execution of order by judge Nacarato), and review of judgment/order to confine , a lower court of such level, to confine to conform to its lawful practice,. Plaintiff holds that MacDonald Douglas has been violated before a final /re considered /amended order, of reconsideration, (which could have been amended if such law MacDonald Douglas had been, authorized or directed for diligence), when Plaintiff obtained the information from the court above. A mis-delivery of package cannot be attributed to Plaintiff for the same reason when Plaintiff was out of country and properly addressed package return prepaid envelope, NOT executed by the court's clerk's office. Why this mis delivery could remotely even take place HAS NO legal or reasonable meaning other than tempering with the proper appeal process, adversely and intentionally under influence from proper appeal process, at the clerk's office when phone number ,address provided properly by plaintiff .

As described in the appeal, as soon as plaintiff found out he immediately resent another package to king county superior court whose label had been provided to the court of appeal, realizing the unexpected temperament of the appeal. Therefore Plaintiff did not fail in his efforts for "reasonable objective" for an "substance essential"[PERC 116] , holding on the elements. As the Plaintiff filed the initial appeal he had served the appeal to the Department accordingly .

Therefore Plaintiff did not file his petition or judicial review after 48 days rather sent it on the 29th jan 2014 received on the 30th jan, 2014, - This occurred because king county superior court 's clerical error or temperament of the appeal above. When Plaintiff first sent, the appeal, initially, to the superior court , the same day, he has served a copy of the appeal to the Department- within 30 day time frame set by APA chapter 34.05, properly.

Therefore the court of appeal should review liberally based on the facts stated, because the denial took place unlawfully at the agency level much earlier before the appeal process has started, regardless technicalities, that was caused by superior court's error in mis delivery, tempering an appeal procedure , unlawfully sending returned appeal document to address not authorized. Till this day Plainff had not been able to recovery any such returned from the king county superior court, for the addressed it claims that it had returned the envelope to, casting serious doubt, if it were ever sent to him properly.

Therefore, reserving and refiling with subsequent chronological occurrence of facts in limitations period, if it had violated any procedural technically was caused by reviewing king county court's error in mis-delivery or fro non-informing , when Plaintiff exercise his due diligence "reasonable-ly", holding on PERC , 116 & Santore ,28. Adhering to reasonable compliance with the applicable statue.

II COUNTERSTATEMENT OF THE ISSUES:

1. Related facts stated earlier.
2. Related facts stated earlier. Plaintiff timely, initially, served the appeal of the superior court properly within 30 days per statue to commissioner's office. He has reserved the refiled appeal with only an addition to cover sheet to meet his filing obligation,

III. COUNTER STATEMENT OF THE CASE:

Judge Naccarato unlawfully denied benefit to Plaintiff based on direct evidence of deposition, exhibits, stated in this appeal's opening brief, statements of page (2) of this pleadings.

Plaintiff did not in any form or shape committed fraud rather he held on to related RCW weekly calmly period defined scope of claims for the time he had claimed for work in dispute as stated earlier holding on law and "reason" , Rather Defense (State) and employers move to depict to the court that the Plaintiff committed fraud with excuses EEOC v. Boeing hold, . Furthermore Plaintiff cannot trust any agency record of online form other than <u>only RCW/WAC ,Law and statues, for scope of claims</u> and has provided timesheet within those periods because many companies FRAUD IT department is inaccurate or are tempered with. See appendix 1.

Plaintiff had notified the agency for the over payment as shown in exhibits of the appeal.

Whether the commissioner's review office overlooked & erred the facts of truth in justice ,in bias by judge Nacarato's unlawful order ,as found in the transcript , by improper payment in breach of contract, (as stated in the appeal 's opening brief) , is a question to reviewing fact finders, of the truth de no vo , Rather than engaging in a unlawful a tactic, to depict Plaintiff , committed fraud, with excuses .

In response to page 3, 4 :

Plaintiff called in to the commissioner's office from outside of the country(Canada) , and per advice of the representative field an appeal of reconsideration, when he stated that he received the order in mail at Vancouver, BC (where he was interviewing) which may have suffered Canada slower mail delivery & consumed time, enabling him to respond within 10 days , which was a time set for within US mail delivery per RCW, as per response from Department the 10 days starts, the day , agency "drops off the mail at a post office or mails (RCW 34.05.470)" not when Plaintiff received it , at overseas address: 915-360 robson st. Vancouver BC, V6b2b2.

Representative advised plaintiff , to file for reconsideration understanding the situation, when Plaintiff called from out of country(Canada) where mail delivery is slower than US mail delivery. Plaintiff promptly filed a petition reconsideration. Which was considered untimely per page 4 para 2 of reply brief.

Per page 4 last paragraph,

Plaintiff served attorney general 's office with the appeal ,per their acknowledgment "correspondence" by Feb 5th, 2014 for filed appeal on jan 30th (received) 2014.

Plaintiff stated earlier that a reformatted appeal requested by this court and related materials in this court appeal process had been served to defense, and a claim, addition, in March 4 2014, may be in reference to, "for refiled appeal", at court of appeal.

IV. ARGUMENT

Replied earlier in this pleadings.

A.

The trial court erred in considering facts of the truth , de no vo, from Admin Law level, for the denial of benefit from the agency by judge Nacarato and didn't attend to the factual basis for the denial, rather only based decisions if petition of reconsideration was timely or not, which suffered procedural technically in ,mail delivery and receiving

, at a out of country location from the commissioner's office, (may not have been not covered under present WA statues).

Trial court erred in ignoring facts to draw lawful determination in an appeal, of unlawful denial of benefit at ESD level by stated Judge.

Trial court also erred in execution of MacDonald MacDonald Douglas by defense or authorizing such at the superior court, - a question of fact that could have been resolved in motion for reconsideration with supported facts an evidence of tracking receipts.

Plaintiff asserts he suffered from unlawful denial at superior court, which surfaced clearly from ESD level order , to commissioners' office, commissioners' review office , as it is clear, judges Nacarato, unlawfully denied Plaintiff for benefit , compelling plaintiff to fight a battle against the attorney general's office.

Whether it is a tactic by employers is a question , a fact finder can determine ,provided Plaintiff presented evidence, and direct testimony that the employers' are indeed actionable for the breach of contract , under 42 USC and RCW 49.60 as a result of intentional discrimination in approving labor and pay from, initiation of the employment.

Therefore the court must determine the facts ,as de novo ,from the ESD denial level (by ALR2) , for discovering a factual basis of the appeal that originated from the denial of ESD, decision by judge

Nacarato , for substantial evidence, to persuade a fair minded person of the truth, holding on to *Smith v Sahnnon, Sunnyside Valley Irrigation Dist, v Dickie 149 Wn 2d 7873 ,879,73*

The factual basis of the appeal that were placed in front of the trial court are of the same substantiation as it is placed in front of this court, as a result a review of the same materials under testimony and affidavit is appropriate under Riply v. Lanzer.

Plaintiff further holds that his appeal is appropriate under Medina v Pub Util Dist No 1 of Benton County , 147 because " all requirement " have "necessarily involved" a judgment , as to the amount of time "necessary" as required reasonably, for a out of country appeal , that was re-initiated ,within reasonable time, by a clerical error or a mis-delieved return mail by the king county court when plaintiff,initially, sent a postage retuned envelope with his address to Vancouver BC, as he had to evacuated the rental apartment for benefit denial, in Redmond WA.

Contrary to the fact , under Wells Fargo v Dept of Revenue, plaintiff, sent his petition of review at the superior court, recorded on the 7th jan 2014, and served the same appeal initially to the department simultaneously per RCW 34.05 . A refiled appeal was sent with a coversheet to king county superior court on the 29th jan 2014 received on the 30than jan 2014 and second time sent correspondence, within 30 days of the petition.

This matter had been explained in the earlier pages, of this pleadings. As a result he had complied with the statutory requirement of RCW 34.05.542(2) in initial effort to file with king county BUT , court erred in improperly returning or not returning at all, as Plaintiff does not and has not been able to obtain the returned initial appeal, or has no knowledge if it was at all returned, since it was not definitely returned via his postage paid return envelope.,

Under the above scenarios stated plaintiff holds that he has compiled RCW 34.05 in his initial filing, for on time filing and serving the same appeal.

Plaintiff had proven to the court that the reasons of reconsideration of his appeal, ,in his period for reconsideration , clearly, In response to page 8 of the reply brief of defense.

A motion of reconsideration is proper in pleadings under a party statutory rights supported with evidence & facts of the truth , shifting burden to opposing party to verify and validate under MacDonald Douglas & LCR at ALR 2 review . Court didn't ask the defense to validate such information in fairness, as requested under burden shifting principles in motion of reconsideration. Trail court erred.

Plaintiff asserted affidavit with his signature therefore the "first " prolog does not hold because none of the facts are unsworn. Department excuses on this initative to comply with MacDonald Douglas on excuses. Therefore defense violated, Lemond v Dept of Licensing does not hold because the evidence resided within king country sup court as asserted earlier, evidence specific and substantial in nature, *Stegall v Citadel Board Co holds.*

A decision by the superior court could have amended, provided with reconsideration petition, which could have reversed adverse decision, specific and substantial (*Stegall v Citadel Board Co holds.)*, that did not barr justice under Wilcox, v Lexinton Eye Inst. Plaintiff stated in motion of reconsideration , the package that was claimed to have been returned by the court, to a non-returnable unauthorized address , when plaintiff provided court with returnable address – a fact that department can verify from the king county court 's clerk's office, record.

An amended order was not field or above information was not allowed to be investigated , resulting in judicial error or in compliance with the law, under MacDonald Douglas when Plaintiff shifted the burden to the defense, for verification of such facts of the truth, in motion for reconsideration ,allowable under Court rule, & procedure. Court rule

was violated in bias, in negligence or unwieldiness favoring defense to discover a fact. MacDonald Douglas was violated.

Reason of return per clerk's office was clearly stated earlier, that the appeal did not accompany a cove sheet, which is not a APA violation. A minute procedural technicality.

In response to page 10 of the reply brief , stated earlier numerous times that Plaintiff had compiled with the rule, & related RCW but his appeal did not accompany a cover sheet , Which is not substantial reason to disqualify an appeal which was received ,initially, on time, set forth in RCW 34.05

The tracking number of the package is helpful enough to find the origination and delivery of the package and can be validated from the listed tracking number regardless the address is not shining or visible from scan. Thus he has substantially compiled with statutory "time limitation" , in initial fiddling of the appeal which was claimed to be returned to the Plaintiff and Plaintiff never received such returned package till now, from court., to recover. Plaintiff states that it is an excuse when the actual returnable paid postage envelope was sent along for a stamped copy , to return back to his package listed address . Plaintiff holds that the explanation of the court based on the above is unworthy of credence that it ever sent the appeal package to the plaintiff. . Therefore Cheek v Emp' Sec Dept doesn't hold. Plaintiff

asserts that he had initially compiled and served the appeal to the department and to the court complying with the statuary limitations period.

Plaintiff requested to department to obtain , a trace record of the package and label from the court by shifting burden , for validation by the department. Under MacDonald Douglas, which had been deliberately overlooked at the superior courts pleadings, to grant a motion of reconsideration by the court.

Therefore by all above pleadings and explanation plaintiff has proven that the elements, (a) substance essential " (b)"in every **reasonable** objective" [of PERC , 116 Santore ,28] with direct deposition and supported evidence. Proving that he has met all reasonable elements necessary , for the compliance of the statue which are not pretext or false , establishing factual basis to be true, beyond doubt (Orwick v Seattle ,103) or which were to associated with a "reason " towards an intent to comply with the elements of the statue, within reasonable time , while outside of the country and interviewing in an unemployed status – as a result of unlawful denial of benefit, by ESD and by claims , of untraceable or improperly returned, of an appeal package from the superior court , which was never recoverable and which was never sent to the postage paid return envelope from the court for a stamped copy of the appeal, to return to him.

Thus under the holding of the above (a)(b)elements of PERC , 116 & Santore ,28 , - actual compliance was executed although [albeit]may have been procedurally faulty, meeting elements necessary to comply with intent to do so. Therefore this and superior court's appeal is compliant under the above because it has established meeting substantial material , reasonable for the objective of compliance of RCW 34.05 , holding on Medina ,147 Plaintiff complied within 30 day period to file and served the appeal, to the department, received at the king county superior court on the 7th jan 2014, which court claims returned to an unauthorized address ,when Plaintiff, provided return envelope with proper address. Thus [a] justified cause[s] exist[s] for any delay that might have been caused by the superior court's error, which has affected any reasonable "substantial compliance" for a statutorily set time, which was not in control of the Plaintiff but was affected by error, of the court clerk. When all substantial material accompanied the appeal was served tithe department, within statutory limitations. – Except a cover sheet for the appeal –holding that Forseth V. city of Tacoma has not been violated – to overrule, a denial of the appeal, on the stated cause, under Shafer v State. And Per , Petta V Dept. of Labor & Indus, 68 that Plaintiff did not violate any mandate or had intent of such. For the same reason, the plaintiff holds on to, nested statues of RCW 34.05 , - RCW 34.05.310(out of state/country state limitation should apply contrary) .

In this regards plaintiff did not fail to properly serve the same appeal to the department, only the court filing accompanied a cover sheet which was field on the 30 the jan 2014 , sent from out of country for an untraceable or missing return appeal from the superior court , which had been served the same day , Dec 31st ,2014, by mail from Vancouver, bc, to the department. Therefore substantial compliance had not been violated.

Plaintiff's appeal which did not accompany, initially, a cover sheet is not a part of the APA filing requirement. When he complied with such APA requirement. No APA requirement was violated in initial filing ,for a missing return appeal , claimed to have been sent , by the court, that court claims was returned, which Plaintiff never received , when he specially provided paid postage for a return mail from the court for a filed/ stamped appeal, to return to him.

B.

Plaintiff asserts the department was served with the same initial appeal sent to be filed to the Sup. Court that ,court received on the 7th Jan 2014, per APA required 30 days serving period, in compliance. Between the sharp line of RCW 34.05.542(2) and WAC 192-04-210, plaintiff assert he has served by guaranteed mailing to commissar's office sent on the 31st Dec 2014, by which Dept acknowledges a cause of action started at Superior Court. Same day appeal was sent to King county superior court, initially. Plaintiff asserts this doubt of

service on the department is a tactic, to dismiss the appeal, when commissioner's office was served, Properly per 34.05.542(2). Therefore Sprint Spectrum LP v. Dept of Revenue does not hold for timely served appeal to the commissioner's office, and is in-appropriate.

C. Superior court therefore erred in it decision to deny for motion for reconsideration because, the appeal & service of, complied with RCW 34.05, and court violated Macdonald Douglas, and its inability to reconsider motion, provided with substantial evidence ,sufficient to persuade a fair minded person of the truth, in deprival of LCR for reconsideration or by amending the order when plaintiff didn't violate Landstar Inway Inc v Samrow or Mayer v Sto Indus Inc. , because there exist no untenable grounds or untenable reasons, and the court relied on unsupported fact in applying wrong legal standard or not applying at all, (MacDonald Douglas)for re-consideration for the petition holding on state v Rohrich. That the trial court decision , manifested unreasonable because it falls outside the range of acceptable, choices .given the facts , and the applicable legal standards" holding on, State v. Dye.

Plainff filed a response to Dept's motion to dismiss, and reconsideration, along with a motion of prejudice which was later on sent separately, to the department, in addition to the appeal served to

the commissioners' review office. Plaintiff served the department with the initial appeal within 13th jan 2014. And later on sent motion of prejudice in a separate envelope.

Department acknowledges that , on Feb 4th 2014, it received correspondence , for refiled appeal of 30th Jan 2014 at Sup Court, as it received correspondence of appeal, but received motion of prejudice on jan 27th 2014. Plaintiff complied with the due process appropriately. Department also confirms that it received, correspondence on March 4th,2014 for , filed documents served properly.

And the motion for reconsideration, is closely related to already raised allegation supported with direct deposition and material evidence of facts ,specific and substantial, already stated in the pleading at trial court holding on, Breuer v. Presta,& was not violated. As a result, plaintiff raised issues, in the superior court's pleading which relied on judge's approval or defense 's failure of verification of facts, for the related superior court's clerk office received appeal , which was not an untanable matter ,that relied on untenable grounds or reasons, for a subsequent motion for re-consideration, that could have been achieved by an Amended order, at superior court.

D. The court of Appeals obligation it provide justice irrespective procedural technicalities. In this appeal, plaintiff seeks justice for his unlawful denial of unemployment benefit by ESD de no vo, by judge Nacarato, with has violated reason and law , shown with the direct

evidence of deposition, and material facts of truth, escalated to division one, for justice. As any statuary warrant's owing amount, can be deducted from any grant approval per ESD advice, until a decision is reached, a stayed petition that concern this appeal is appropriate , regarding the warrant.

V. Conclusion.

Superior court erred in denial of appeal for denial of benefit by the ESD, by judge Nacarato violating reasons and law , for the above reasons stated in this appeal. Plaintiff seeks justice for his intent and compliance of such, for any involved statues with reason and law, " holding the factual matters in the stated pleading".

Plaintiff clearly demonstrated he was not Engadin any fraudulent act, in opening brief , therefore is eligible , under benefit eligibility statue for ESD benefit, & petitions to Hon court to grant benefit, held by unlawful denial of his unemployment benefit, which violated RCW 49.60.270 in the matter stated, supported with direct and circumstantial evidence of truth & reasons of law. Rather defendants proffered explanation, within claiming period, is fraudulent, false, pretext, per appendix 1, unworthy of credence", holding on *Miller 885, Milligan 110. Ashcrof v Iqbal, And therefore employers or defense should not obtain a license to evade, Towmbly v Bell Atlantic.*

Respectfully placed. Pro se Plaintiff, s/shaw rahman

Court APPEAL
DIV - 1
Case No. 723916-I

Affidavit

Shaw Rahman

V

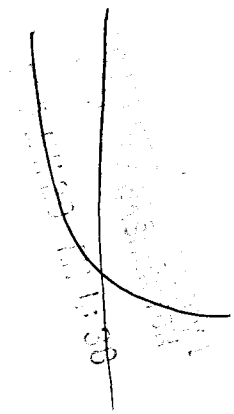
WA State Department of Employment Security.

No 723961-I

I shaw rahman , state that the statements are true and accurate to the best of my knowledge.

Respectfully,
s/Shaw Rahman

Pro SE Plaintiff.



CERTIFICATE OF SERVICE
Court APPEAL
DIV - 1
Case No. 723916-I

Shaw Rahman v. WA STATE ESD

I state that I caused a copy of this appeal brief mailed to the defense attorneys of record mailing address listed in the court record.

With certified mail and return receipt.

Date: stamped with court stamp.

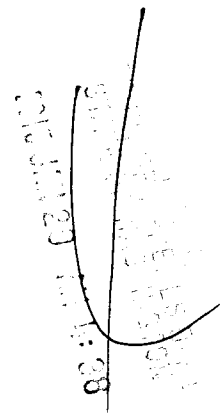
Respectfully,
s/Shaw Rahman
Pro Se Plaintiff

MOTION TO FILE OVERZIZED BRIEF
Court APPEAL
DIV - 1
Case No. 723916-I
Shaw Rahman v. WA STATE ESD

Plaintiff petitions to court to allow to file an oversized reply in, response to defense's, reply brief.

Date: stamped with court stamp.

Respectfully,
s/Shaw Rahman
Pro Se Plaintiff



SCHEDULE OF CLAIMS REPORT

Week Ending	Reported Earnings	Verified Earnings	Employer Name/ Cause:	Benefits Paid	Benefits Entitled	Overpayment Amount	Fraud	Fraud Penalty
11/10/2012	0.00	2,550.00	4 CONSULTING INC	583.00	0.00	583.00	YES	NO
11/17/2012	0.00	3,995.45	4 CONSULTING INC	583.00	0.00	583.00	YES	NO
11/24/2012	0.00	2,977.25	4 CONSULTING INC	583.00	0.00	583.00	YES	NO
12/01/2012	0.00	2,977.25	4 CONSULTING INC	583.00	0.00	583.00	YES	NO

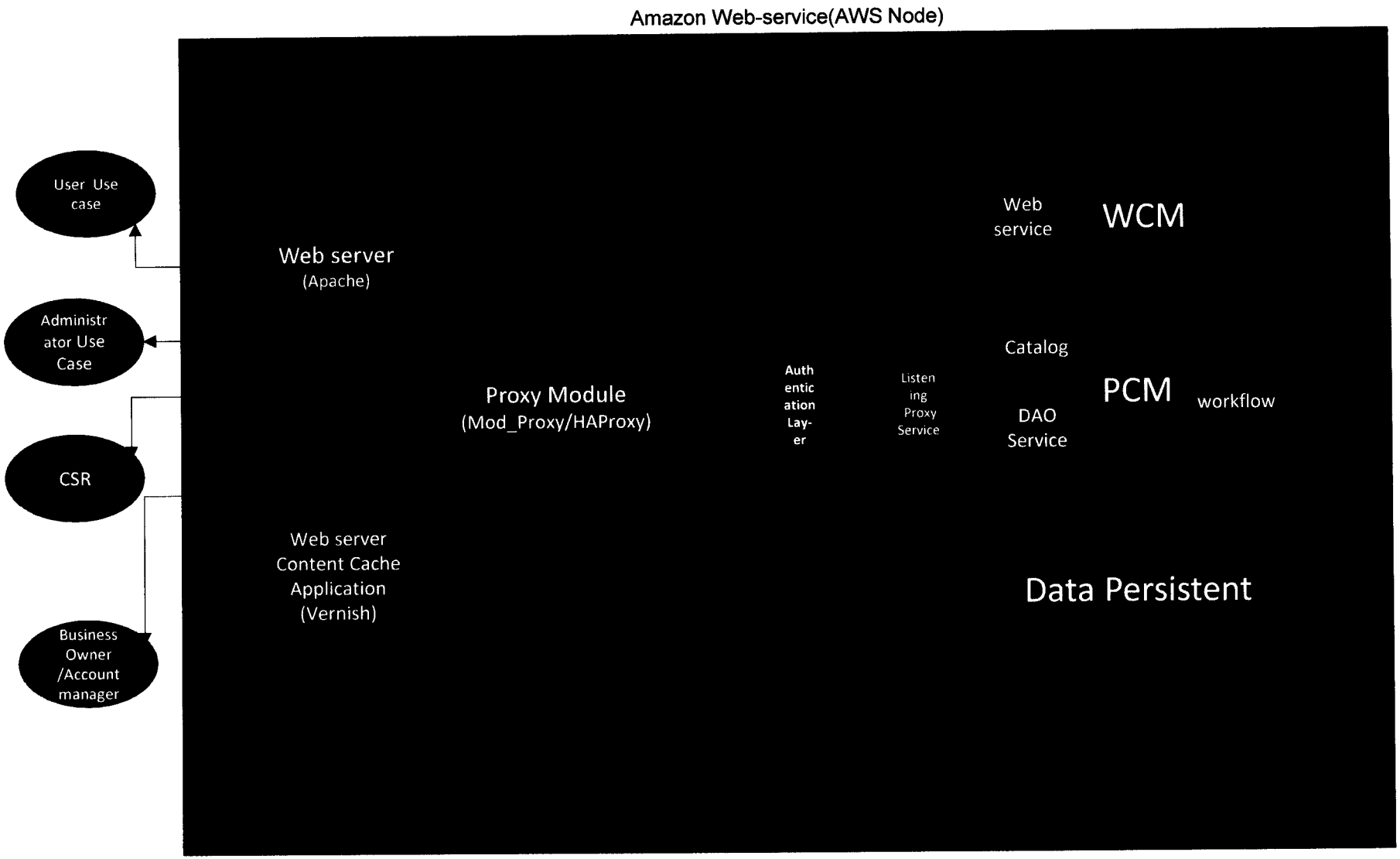
Overpayment Sub-total: 2,332.00
Fraud Penalty Amount: 0.00
Total Overpayment: 2,332.00

Fraud

None was paid within the statutory claiming period.

2000084

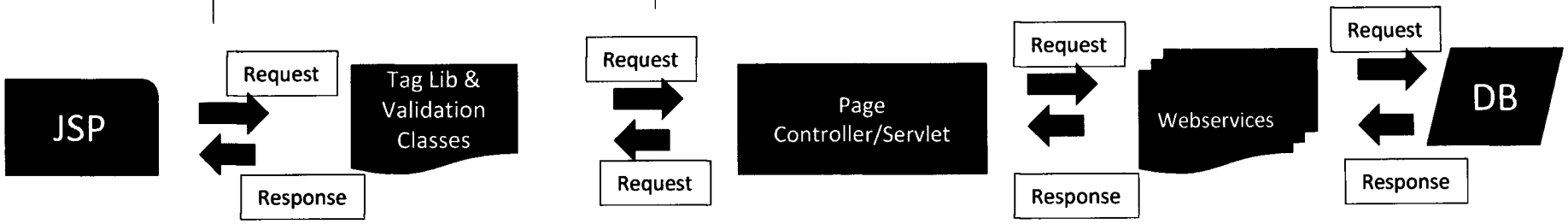
b



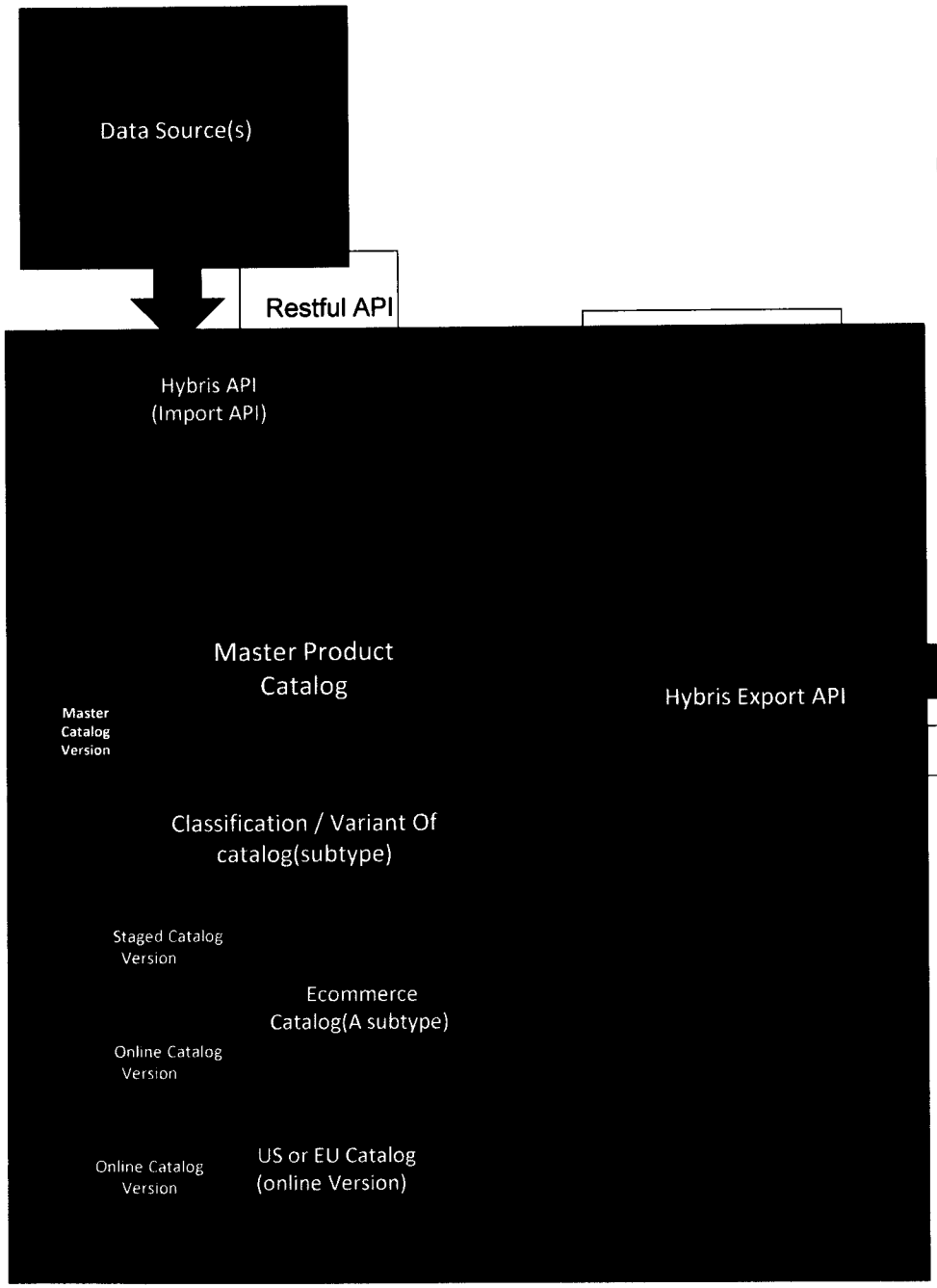
Hybris e-commerce Integration - High Level Context

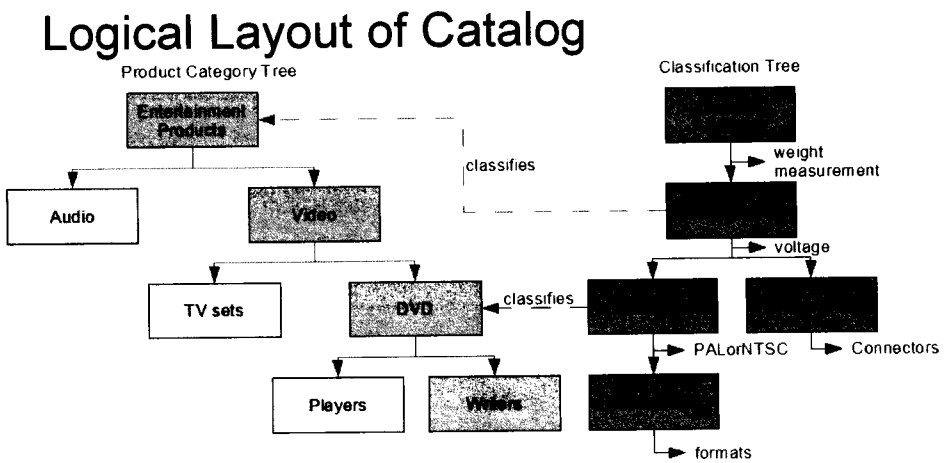
Service Layer

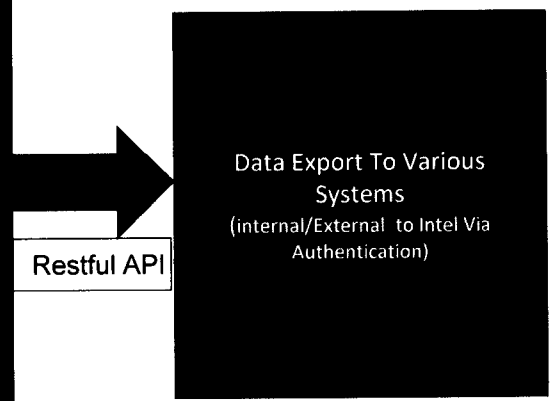
Accelerator storefront (tier 1)	CMS library & CMS cockpit (control for web content, tier 2)	CMS core (tier 3)	Platform/Core	Hybris Persistent
JSP, html, web content	Tag libraries – to have control over content of tier 1	Class for Model Access: •Servlet Controller, (for JSP dispatch from tier 1)	•Proxy, Pojo, adapter classes •Hybris Spring Services •DAO, •façade , •DTO •Business Delegates •Singleton •Decorators	Model , Catalog



Hybris WCM Components & Content Request Management



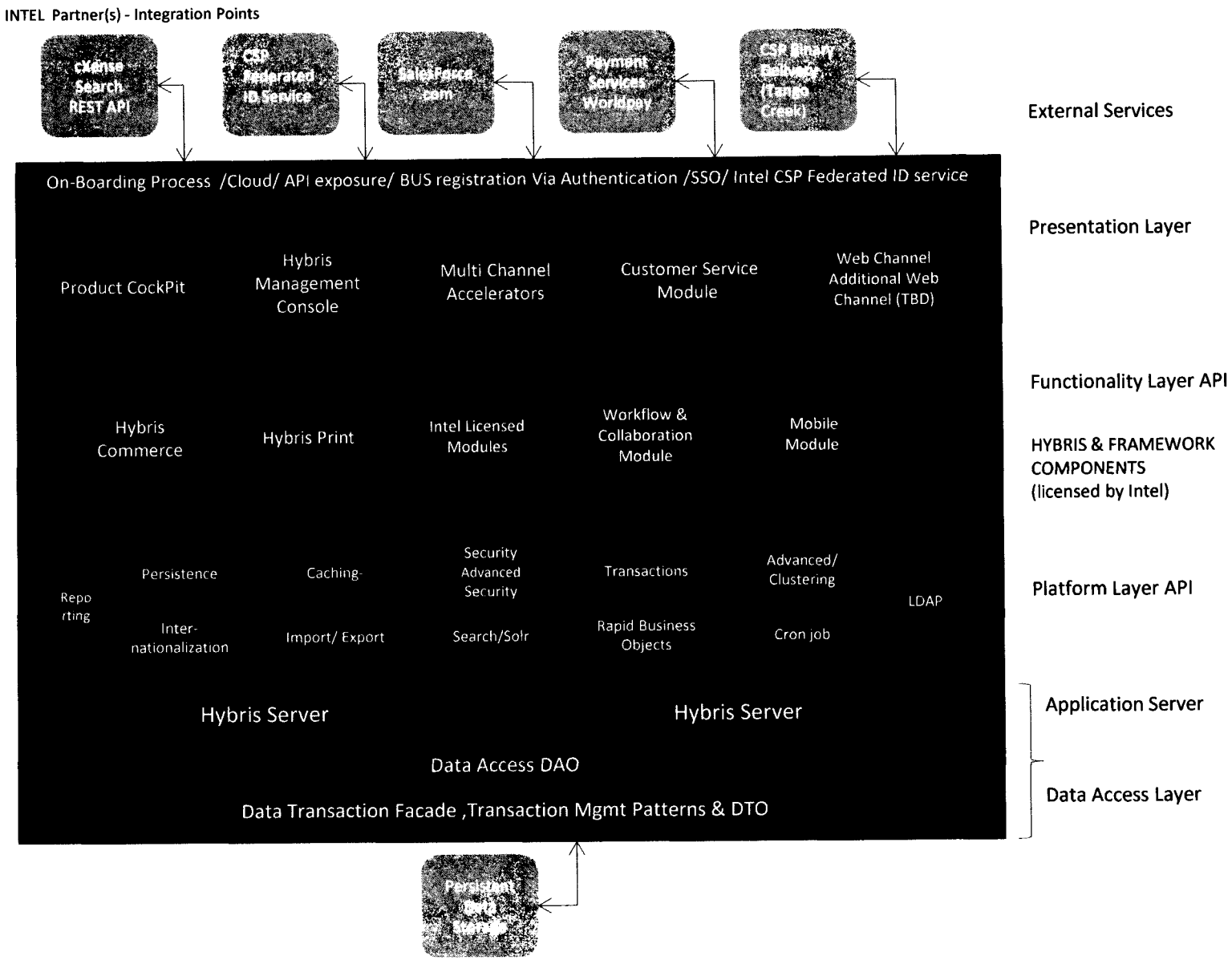




Hybris PCM logical Architecture

Hybris Architecture, System Components & Interfaces / integration points

DRAFT 1



Owner: Steve Baily/Shaw rahman/Deloitte Consulting, Per, DSF Core Platform Systems Integration Version 1.2

Production Required Lists of Elements – SOW API level Agreement- WORK IN PROGRESS

APPUp /Present API Name(old)	Hybrs API names(New)	Convection-Return type /signature Changed (Y/N)	Deprecated (Y/N)	Deloitte(hybris) Deliverables

APPUp /Present Data Object Name	New Hybris Application Data Object Name	Definition Change(if so Field Name)	Deprecated Object (Y/N No longer referenced)	Deloitte Deliverable Data Object Name

What we need:

- Master Catalog in Present AS –IS application & Schema approved to be used
- Master Catalog validation schema and all extensions & schema(s) to be validated against

•Authentication – A valid authentication user to be used as a test user, and all single sign-on criteria met for that user to onboard in all partner systems

•How the Catalog , to be organized – a discussion – by regions and categories in hierarchy –for decentralization/re-organization

•End to End API life-cycle "Flow Diagram" with "Data-object and Interfacing methods /process" (if any) for each Usecase (can be obtained from Business analyst/Process architects' Intel-approved deliverables, for accuracy of information

solrfacetsearch Extension Components :(built on Apache Solr server)

Abstract implementation for

Converter interface (de.hybris.platform.servicelayer.dto.converter.Converter<SOURCE, TARGET>)

implements

Solr result converters:de.hybris.platform.solrfacetsearch.search.AbstractSolrConverter<T>.

it uses the de.hybris.platform.solrfacetsearch.provider.FieldNameProvider interface

Provides ->"protected "utility methods , so that can be overridden

Solr Document from WCM/PCM

for getting the indexed properties values from the Solr documents

Translates the Solr indexed properties,

Platform **Processing** & Providers Framework

Products(PCM) and WCMS contents

Input

Out put

cXense

CxSese API interface

?

CSV file

Impex API

Restful?

Data Transfer Object (DTO)

DTO: de.hybris.platform.solrfacetsearch.search.product.SolrProductData

Converter - de.hybris.platform.solrfacetsearch.search.product.

(Document conversion process)

Converters/Additional /DTO For caching purpose

Performance opt by caching solrfacetsearch extension

Out put indexed content of Solr result

1 Extend :AbstractSolrConverter

Customized Extension (Pojo) With All Properties (fields) Of Indexed converters

bind the indexed type in your Solr configuration with your converter.

Invoke: search API de.hybris.platform.solrfacetsearch.search.SearchResult:<T> List<T> getResultData().

returns DTO-enabled search results.

2. IMPLEMENT : the **de.hybris.platform.servicelayer.dto.converter.Converter<SOURCE, TARGET>** interface

Customeized Solr result converter implementation file

Implement: de.hybris.platform.servicelayer.dto.converter.Converter<SOURCE, TARGET>interface of the generic conversion API in the hybris platform service layer

Register Converter in Spring

Search Preference /Options :

A . Hybris Platform's commerceservices Search using package :
de.hybris.platform.commerceservices.search

() ProductSearchAutocompleteService
() ProductSearchService

- Less dependency on Extension

B. Using a Search Extension

solrfacetsearch Extension over Package de.hybris.platform.core (Generic), because the former provides enhanced capabilities in optimizing performance by caching solrfacetsearch extension an.

Open Questions :

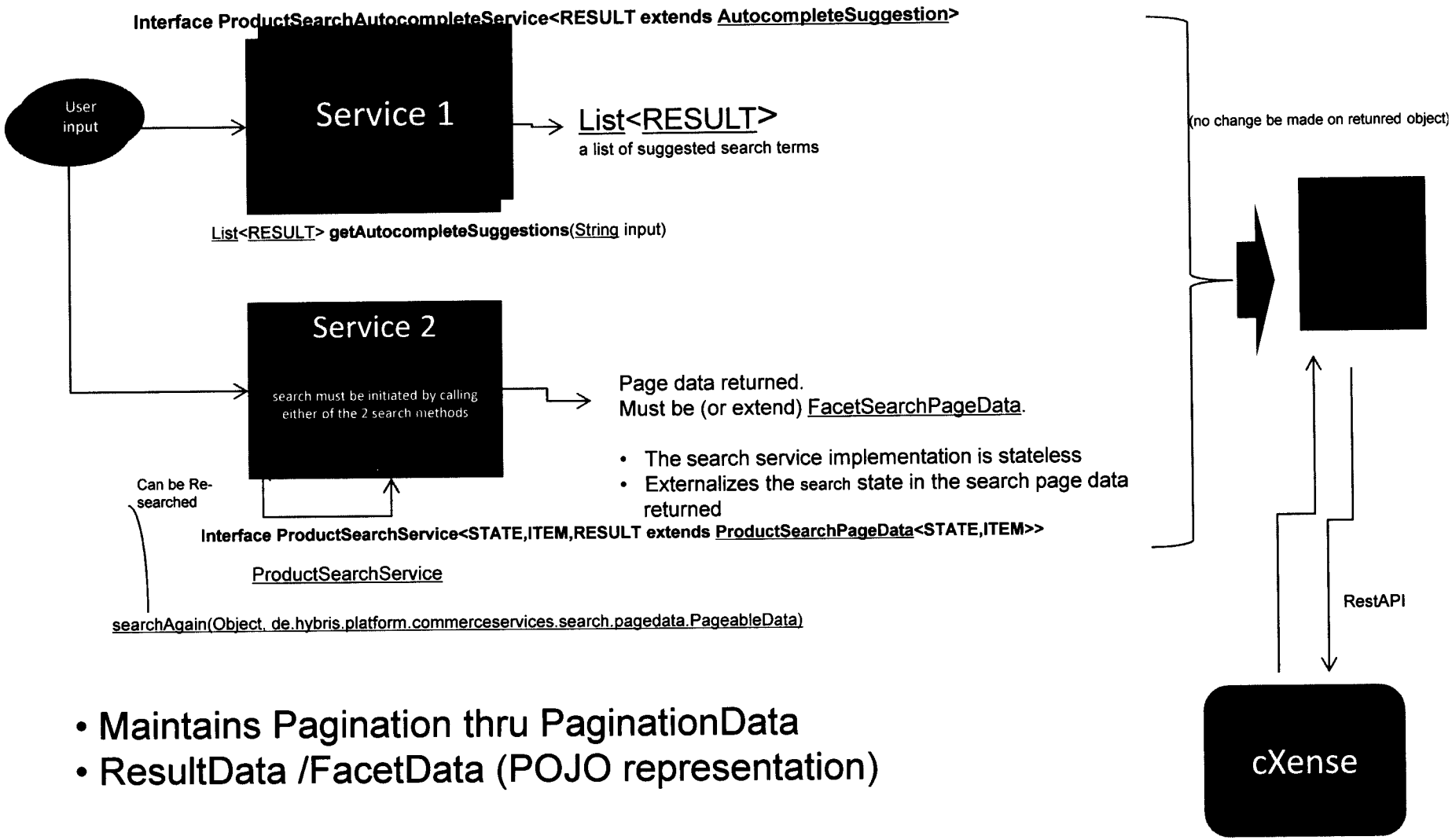
cXense Service Layer :

What API s we need to interface with, to pass a indexed Domain object (s) – to initiate a request and response established between Hybris Search components/Extension and cXense ?

Catalog Questions:

For Each OEM will the Persistent Data storage be geographically regulated and stores to each geography (Regional, Federal, and Intel compliance for database physical location)

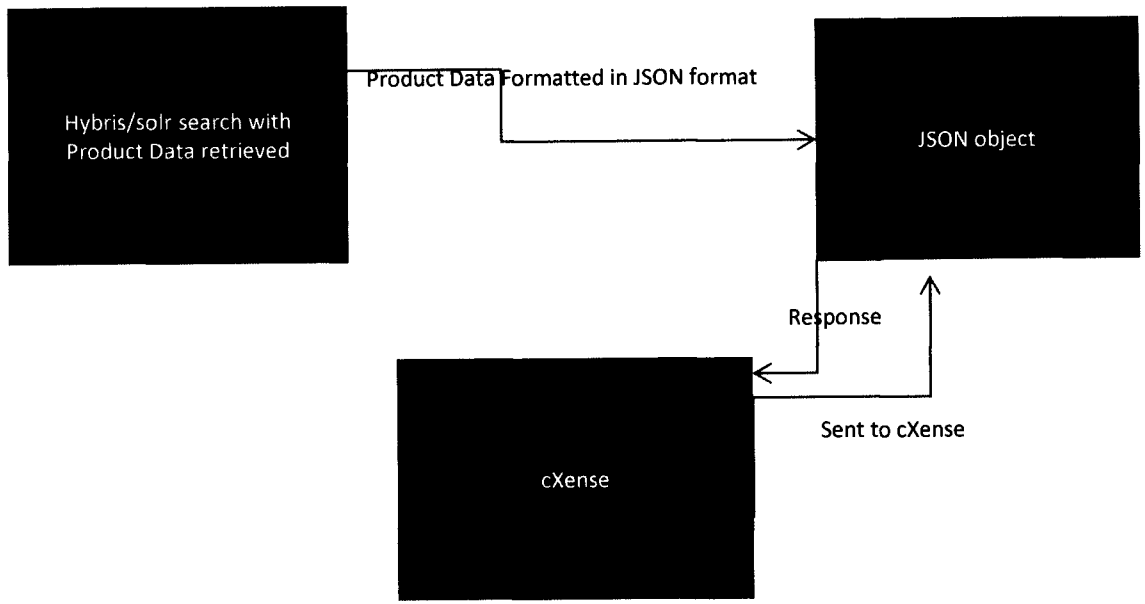
Commerce Service Search

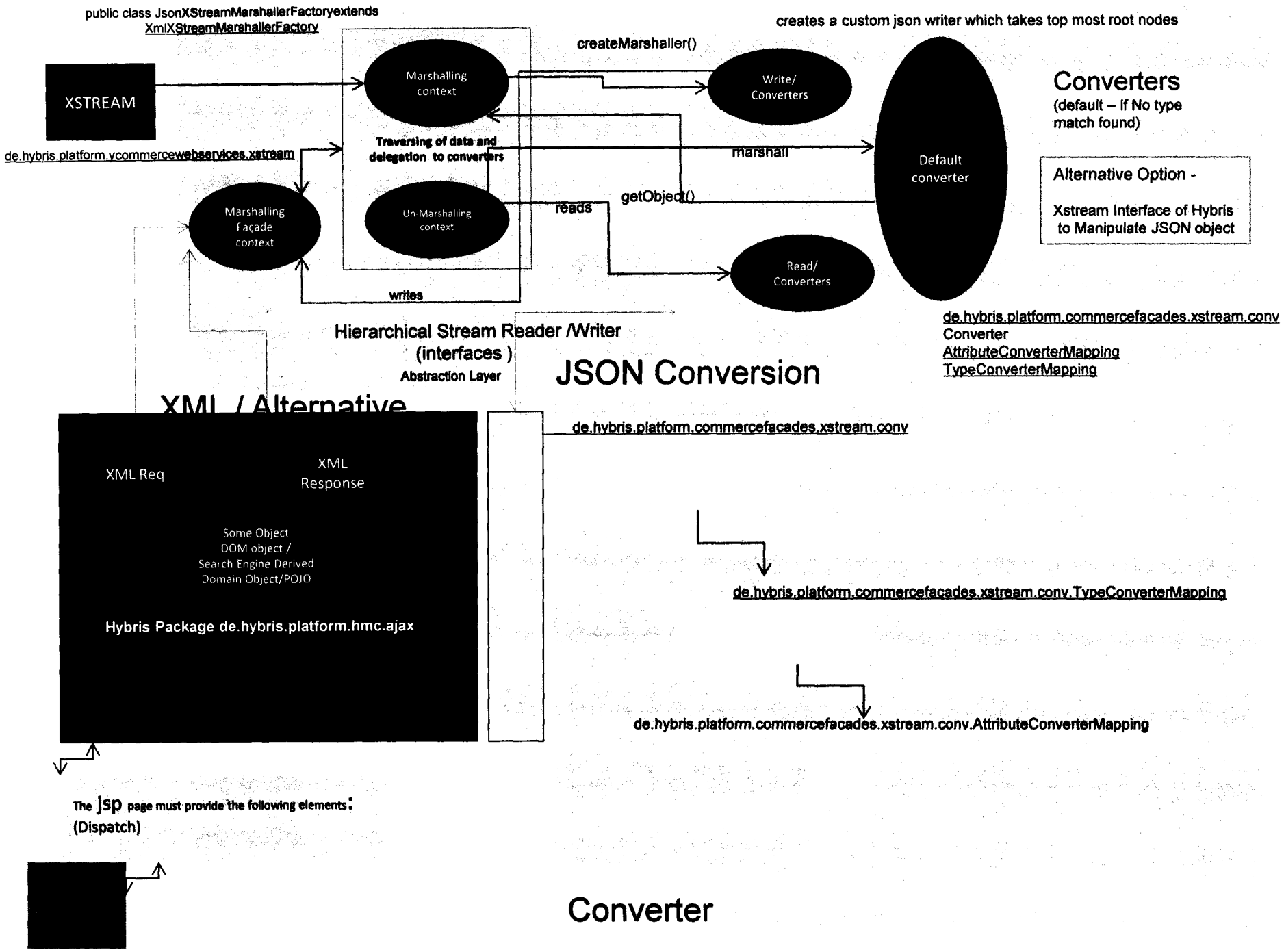


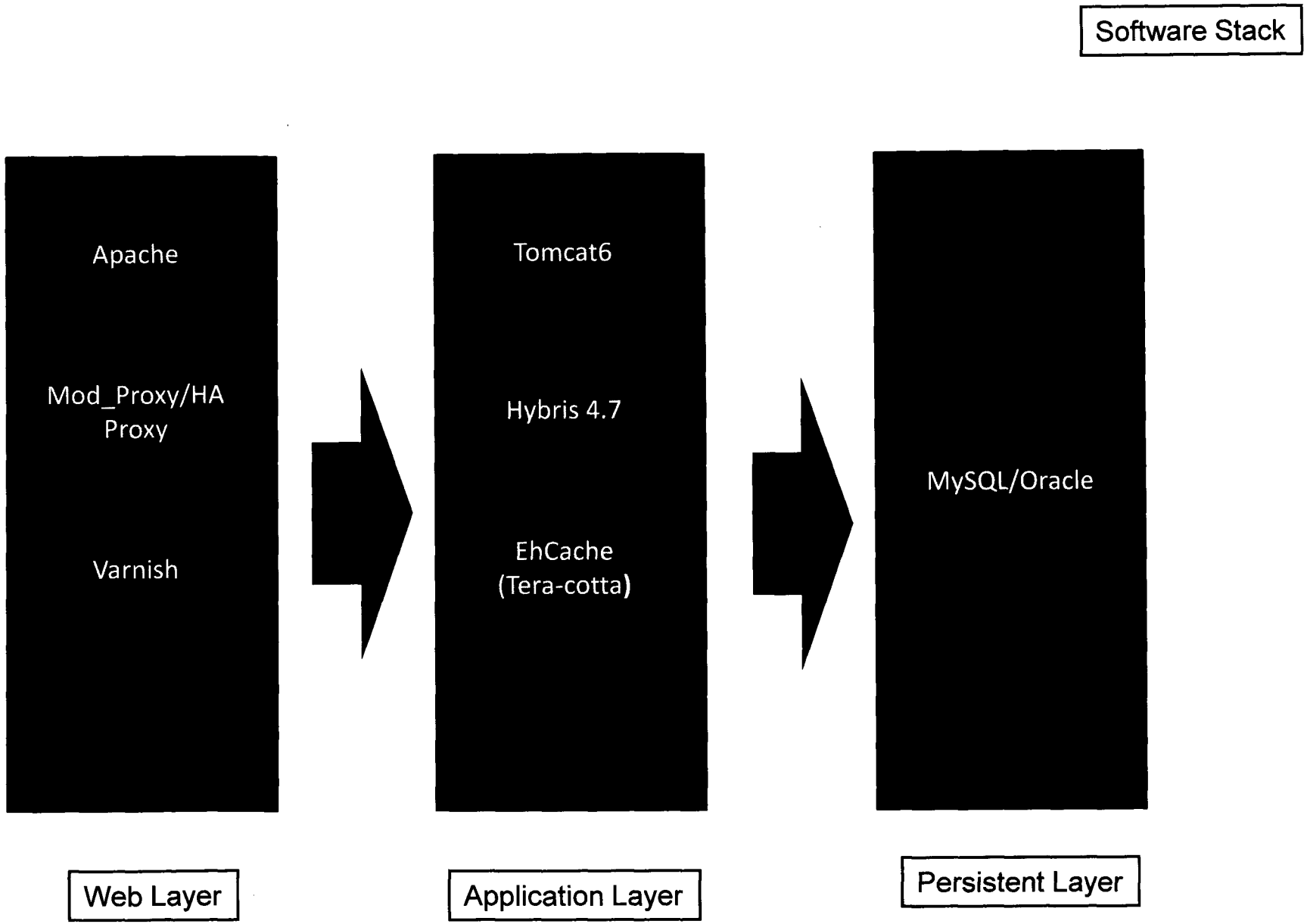
- Maintains Pagination thru PaginationData
- ResultData /FacetData (POJO representation)

BreadcrumbData
FacetData
FacetRefinement
FacetSearchPageData
FacetValueData
ProductCategorySearchPageData
ProductSearchPageData
SpellingSuggestionData

Hybris Solr Search to cXense
High level context




public class JsonXStreamMarshallerFactoryextends
XmlXStreamMarshallerFactory
XSTREAM
de.hybris.platform.ycommercewebservices.xstream
Marshalling context
Traversing of data and delegation to converters
Un-Marshalling context
Marshalling Façade context
writes
reads
getObject()
marshall
createMarshaller()
Write/ Converters
Read/ Converters
Default converter
creates a custom json writer which takes top most root nodes
Converters
(default – if No type match found)
Alternative Option -
Xstream Interface of Hybris to Manipulate JSON object
de.hybris.platform.commercefacades.xstream.conv
Converter
AttributeConverterMapping
TypeConverterMapping
Hierarchical Stream Reader /Writer
(interfaces)
Abstraction Layer
JSON Conversion
XML / Alternative
XML Req
XML Response
Some Object
DOM object /
Search Engine Derived
Domain Object/POJO
Hybris Package de.hybris.platform.hmc.ajax
de.hybris.platform.commercefacades.xstream.conv
de.hybris.platform.commercefacades.xstream.conv.TypeConverterMapping
de.hybris.platform.commercefacades.xstream.conv.AttributeConverterMapping
The jsp page must provide the following elements:
(Dispatch)
Converter


Software Stack
Apache
Mod_Proxy/HA Proxy
Varnish
Tomcat6
Hybris 4.7
EhCache (Tera-cotta)
MySQL/Oracle
Web Layer
Application Layer
Persistent Layer