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STATE OF WASHINGTON  
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IN THE SUPREME COURT OF  
THE STATE OF WASHINGTON

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ROBERT PIEL & JACQUELINE PIEL,  
husband and wife,

Appellants,

v.

THE CITY OF FEDERAL WAY, a  
Municipality organized pursuant to the  
laws of the State of Washington,

Respondents.

No. 83882-8

PIEL RESPONSE TO  
BRIEFS OF AMICI  
CURIAE WELA &  
WSAJF

RESPONSE

Petitioners Piel agree with the arguments set forth in the amicus briefs of the Washington Employment Lawyer's Association and the Washington State Association for Justice Foundation. Because of the relatively unusual procedural posture of this case, with the Court holding a petition for direct review, deciding a case in the interim, and then accepting direct review, there has been no opportunity for the parties to brief the intervening decision, and the Court has not called for supplemental briefing. In these circumstances, the *amici's* briefing is particularly helpful, and the Court will no doubt give it very careful consideration.

PIEL RESPONSE TO BRIEFS  
OF AMICI CURIAE WELA & WSAJF - 1

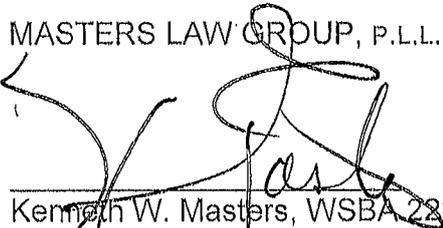
ORIGINAL

The Petitioners also hope that the Court will take a relaxed view of the rules regarding issues raised "only" by *amici*, again in light of the procedural posture of this case. RAP 1.2(a) (RAPs liberally construed to promote justice). The Petitioners hereby adopt the arguments in the amicus briefs.

While the amicus briefs are very helpful, it would not be helpful for the Petitioners to belabor the points *amici* have already made so clearly. Again, the Piels agree with them, and ask the Court to give them careful consideration.

RESPECTUFLY SUBMITTED this 4<sup>th</sup> day of September, 2012.

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PIEL RESPONSE TO BRIEFS  
OF AMICI CURIAE WELA & WSAJF - 2

CERTIFICATE OF SERVICE BY MAIL

I certify that I caused to be mailed a copy of the foregoing  
**PIEL RESPONSE TO BRIEFS OF AMICI CURIAE WELA &  
WSAJF**, postage prepaid, via U.S. Mail this 4<sup>th</sup> day of September,  
2012, to the following counsel of record at the following addresses:

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PIEL RESPONSE TO BRIEFS  
OF AMICI CURIAE WELA & WSAJF - 3

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Rec. 9-4-12

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Case: *Piel v. The City of Federal Way*

Case Number: 83882-8

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THANK YOU.

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