

FILED
COURT OF APPEALS
2011 MAR 24 PM 4:35

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NO. 66252-0-1

COURT OF APPEALS OF THE STATE OF WASHINGTON
DIVISION I

DIANNE KLEM, as administrator of the estate of Dorothy Halstien,

Respondent/Cross Appellant,

vs.

WASHINGTON MUTUAL BANK, a Washington corporation, and

Defendant,

QUALITY LOAN SERVICE CORPORATION OF WASHINGTON, a
Washington corporation, and QUALITY LOAN SERVICE
CORPORATION, a California corporation,

Appellants/Cross Respondents.

**RESPONDENT/CROSS APPELLANT'S ANSWER TO BRIEF OF
AMICUS CURIAE ATTORNEY GENERAL OF THE STATE OF
WASHINGTON IN SUPPORT OF CROSS-APPELLANT**

NORTHWEST JUSTICE PROJECT
Frederick P. Corbit, WSBA #10999
401 - 2nd Avenue South, Suite 407
Seattle, WA 98104
(206) 464-1519

Attorney for Respondent/Cross Appellant

I. ANSWER

Respondent/Cross Appellant Dianne Klem welcomes Attorney General Robert M. McKenna's participation and insight into Klem's request for an injunction. Further, Klem concurs with the Attorney General's conclusion that this case should be remanded to the trial court, with respect to the injunction issue only, with direction to craft an injunction that upholds the language and goals of the Consumer Protection Act.

II. CONCLUSION

This Court should affirm the trial court's monetary judgment, but on remand should direct the trial court to issue an injunction.

RESPECTFULLY SUBMITTED this 24th day of March, 2011.

NORTHWEST JUSTICE PROJECT

By Frederick P. Corbit
Frederick P. Corbit, WSBA #10999
On behalf of Halstien's Representative,
the Respondent/Cross Appellant

DECLARATION OF SERVICE

JEANNE PERRIN declares as follows:

I certify that on March 24, 2011, I caused to be filed with the Court of Appeals of the State of Washington Division I RESPONDENT/CROSS APPELLANT'S ANSWER TO BRIEF OF AMICUS CURIAE ATTORNEY GENERAL OF THE STATE OF WASHINGTON IN SUPPORT OF CROSS-APPELLANT, and caused to be delivered, via postage prepaid U.S. mail, a true and accurate copy to:

James T. Sugarman
Assistant Attorney General
800 5th Avenue, Suite 2000
Seattle, WA 98104

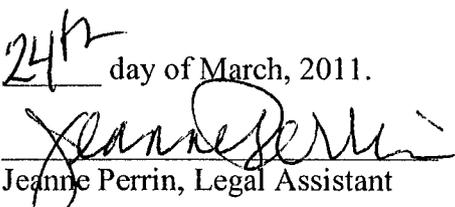
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Respondents*

I declare under the penalty of perjury under the laws of the State of Washington that the foregoing is true and correct to the best of my knowledge and belief.

Executed in Seattle, WA, this 24th day of March, 2011.



Jeanne Perrin, Legal Assistant

RESPONDENT/CROSS APPELLANT'S
ANSWER TO BRIEF OF AMICUS CURIAE
IN SUPPORT OF CROSS-APPELLANT - 2