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No. 89317-9

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SUPREME COURT OF THE  
STATE OF WASHINGTON

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SENTINEL C3, INC., a Washington Corporation,

Petitioner,

v.

CHRIS J. HUNT, an individual and the marital community, if any,  
comprised of CHRIS J. HUNT and CARMEN HUNT; MICHAEL  
BLOOD, an individual and the marital community, if any, comprised of  
MICHAEL BLOOD and JANA E BLOOD,

Respondent.

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SUPPLEMENTAL BRIEF OF RESPONDENTS  
CHRIS & CARMEN HUNT

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Attorneys for Respondents Chris & Carmen  
Hunt

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## I. ARGUMENT

The August 15, 2013 opinion of the Court of Appeals provided a detailed summary and analysis of the extensive law that supports the Court's decision therein. Sentinel C3 Inc. v. Hunt, 176 Wn. App. 152, 309 P.3d 582 (2013).

The Washington Supreme Court can only reverse the decision of the Court of Appeals by overturning well-established case law, statutes, and court rules regarding the summary judgment standard, dissenter's rights actions, valuation of shares, evidence and authentication, bad faith, and the requirements for both awarding and entering a judgment on attorney's fees. *Id.*; see also *Brief of Appellant Hunt and Reply Brief of Appellant Hunt, previously filed with the Court of Appeals, Div. III, and on record before this Court.* RAP 13.7(a).

Sentinel C3 has failed to provide any legal basis or authority for ignoring the doctrine of *stare decisis* and overturning all of this established law. Instead, Sentinel C3's arguments are result driven, seeking to use the summary judgment process to establish their valuation is right – and everyone else is wrong. Such result, and thus Sentinel C3's arguments towards that end, are contrary to the express provisions and purpose of the dissenters' rights statutes, RCW Chapter 23B.13. If Sentinel C3 wants a different outcome, it must change the controlling statutory law – and that is something the Washington Legislature can do, not the courts.

II. CONCLUSION

Accordingly, Respondents Chris and Carmen Hunt respectfully request that the Court uphold the extensive law that supports the decision of the Court of Appeals, and affirm that decision.

In response to the arguments raised in Sentinel C3's Supplemental Brief, Respondents Hunt would refer the Court to Respondents' prior briefing before the Court of Appeals – which already addresses all relevant arguments.

DATED this 7<sup>th</sup> day of March, 2014.

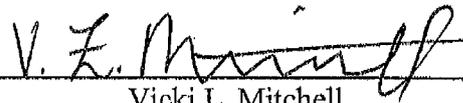
PAINE HAMBLEN LLP

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Chris & Carmen Hunt

**CERTIFICATE OF SERVICE**

I hereby certify that on the 7th day of March, 2014, I caused to be served a true and correct copy of the foregoing document by the method indicated below, and addressed to the following:

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Vicki L. Mitchell

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