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NO. 91040-5

WASHINGTON STATE SUPREME COURT

ERICKA RICKMAN,

Petitioner

vs.

PREMERA BLUE CROSS,

Respondent

SUPPLEMENTAL BRIEF OF PETITIONER

DENO MILLIKAN LAW FIRM, PLLC
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ORIGINAL

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A. INTRODUCTION:

The Division I Court of Appeals erred in affirming the trial court's summary judgment dismissal of Petitioner Ericka Rickman's ("Ericka's") public policy wrongful discharge claim, finding Respondent Premera Blue Cross' ("Premera's") internal anonymous reporting system to be an adequate alternate means of promoting the public policy of protecting private health care information. Premera admits it abandoned its proposed "risk bucketing" plan because it determined the plan to be illegal. Further, Premera did so after Ericka raised concerns about the plan's potential for violating health insurance privacy laws. Given the degree of Premera's planned wrongdoing, Ericka's manner of reporting her concerns to her supervisor, Rick Grover, was reasonable and effective. Under Dicomes, Piel, Hubbard, Becker, and Cudney, Ericka's claim for wrongful discharge in violation of public policy survives.

B. ASSIGNMENTS OF ERROR:

1. The trial and appellate courts erred in finding Ericka failed to establish her burden of production on the jeopardy element of the tort of wrongful termination in violation of public policy.

2. The trial court erred in finding Ericka failed to establish her burden of production on the 'absence of justification' element of the tort of wrongful termination in violation of public policy.

C. ISSUES PERTAINING TO ASSIGNMENTS OF ERROR:

1. Whether an employer can escape liability from the tort of wrongful discharge in violation of public policy by establishing an anonymous complaint line?

2. Whether granting summary judgment on the factual 'absence of justification element' is appropriate?

D. STATEMENT OF THE CASE:

From August 31, 2004 through November 3, 2009, Ericka worked for Premera as Director of its subsidiary known as Washington Alaska Group Services, Inc. ("WAGS") and later known as Ucentris Insured Solutions ("Ucentris"). CP 178-179.

In mid-September 2009, Ericka learned that Pacific Benefits Trust (PBT), a large association underwritten by Premera, was likely merging with another association, Washington Grocers Trust (WGT), underwritten by Providence. CP 187, ¶34. Premera would lose PBT membership if the merger happened. *Id.*, CP 187. Ericka confirmed this information with Premera's Director of "Small Business Group", Robin Hilleary. *Id.*, CP 187. Ericka also told Ms. Hilleary that a Ucentris Captive Agent (independent insurance broker) had a client who wanted the agent to look for other non-Premera insurance for his business due to this merger. *Id.*, CP 187. Ericka asked Ms. Hilleary if it was okay for her Captive Agent to do so. In response, Ms. Hilleary told Ericka Premera was strategizing to

retain the membership rather than have agents look outside Premera for insurance for their clients. CP 187, ¶34. Ms. Hilleary also told Ericka Premera planned to use Ucentris agents to move the membership of preferred groups of the merged associations into associations that were underwritten by Premera. *Id.* CP 187. Ericka believed this would be an illegal form of “risk bucketing” (separating riskier policy holders from less risky ones and putting them into separate “buckets” for underwriting) because it would require disclosure of private policyholder information. *Id.*, CP 187.

Ericka then informed her boss, Rick Grover¹, of her conversation with Ms. Hilleary and of her concern with this strategy, saying that using Ucentris agents to move non-Premera membership into associations underwritten by Premera “had HIPAA written all over it.” CP 187-188, ¶35. Ericka told Mr. Grover that, in the past, she would talk to her supervisor about HIPAA issues and together they would take it up the chain of command to make sure everything was legal. *Id.*, CP 187-188. Mr. Grover demurred, stating, “Ericka, we don't always tell everything to [Senior Executive Vice President of Sales and Marketing] Heyward Donnigan because she's like a dog on a bone when she finds something

¹ Mr. Grover is Premera's Vice President and General Manager for Ancillary Business and Distribution Strategy at Ucentris Insured Solutions.

out." CP 188, ¶35. Ericka responded, "But that's the way I have always done my business," to which Grover replied, "There's a new Sheriff in town." *Id.*

On September 28, 2009, Mr. Grover forwarded an email trail to Ericka confirming her concern that Premera leadership planned on engaging in a form of "risk bucketing" that would potentially violate health insurance privacy laws. CP 188, ¶36. Ericka told Mr. Grover she appreciated him sending the email, and reiterated her concern that the "risk-bucketing" plan was inappropriate and possibly illegal. CP 189, ¶38. Mr. Grover simply replied he was more concerned about "stepping on the toes" of the agent, Drew Butler. CP 189, ¶36.

In Plaintiff's First Interrogatories and Requests for Production of Documents to Defendant, Interrogatory No. 12 asked:

Identify and describe the date, subject matter and Premera executive, including, but not limited to, Rick Grover, involved in any and all conversations with, and/or complaints by plaintiff, regarding risk bucketing and/or the potential for violations of Health Insurance Portability and Accountability Act. CP at 67.

Without objection, Premera answered this interrogatory as follows:

Mr. Grover recalls one meeting in which risk bucketing was briefly discussed. **The group quickly determined that risk bucketing was not a lawful option for that particular situation**, and ended the discussion. Mr. Grover does not recall the date of this meeting. *Id.* (emphasis supplied).

The trial court, for purposes of summary judgment, accepted Ericka's testimony that she discussed her "risk-bucketing" concern and its potential health insurance privacy implications with Mr. Grover in mid-September 2009. CP at 16-17. The appellate court likewise accepted this testimony. *See* Appendix to Petition for Review at A-006-A007.

On or about September 11, 2009, Premera received an anonymous complaint about Ericka through its "ethics hotline" internet link, alleging Ericka was violating Premera's conflict of interest policy by not disclosing the fact that her son "worked" for Premera. CP 189. Although Ericka's son was an independent "Captive Agent", not a Premera employee, Premera nonetheless investigated the complaint and terminated Ericka's employment on or about November 3, 2009, not for the alleged conflict of interest, but for "lack of integrity" and "poor judgment". CP 190. Ericka avers Premera terminated her employment because she expressed concerns that Premera's intended "risk bucketing" would violate health insurance privacy laws. CP 190-191.

E. ARGUMENT:

1. At-Will Employment Does Not Shield Employers from Wrongfully Discharging Employees in Violation of Clear Manifestations of Public Policy.

In Thompson v. St. Regis Paper Co., 102 Wn.2d 219, 685 P.2d 1081 (1984), Washington joined a growing number of jurisdictions in

recognizing a cause of action in tort for wrongful discharge in violation of public policy. “The policy underlying the exception is that the common law doctrine cannot be used to shield an employer’s action which otherwise frustrates a clear manifestation of public policy.” *Id.* at 231, 685 P.2d 1081. The Thompson Court explained “The exception has been utilized in instances where application of the terminable at will doctrine would have led to a result clearly inconsistent with a stated public policy and the community interest it advances.” Thompson, *supra*, 102 Wn.2d at 231, (citing Roberts v. ARCO, 88 Wn.2d 887, 897, 568 P.2d 764 (1977)). To clarify the purpose underlying the public policy exception, the Thompson Court compared two cases from other jurisdictions:

[I]n *Harless v. First Nat’l Bank*, 162 W.Va. 116, 246 S.E.2d 270 (1978) a bank employee was discharged after attempting to make his employer comply with the state consumer credit and protection laws. The West Virginia Supreme Court held that despite the general rule, the bank could be liable for wrongful discharge because the discharge would otherwise frustrate a clear manifestation of public policy, protection of consumers of credit. In contrast to the result reached in *Harless*, when the interest alleged by the plaintiff/employee has been found to be purely private in nature and not of general public concern, the general rule applied and no liability attached to the employer’s action. [...] Thus, in Washington the tort of wrongful discharge is not designed to protect an employee’s purely *private interest* in his or her continued employment; rather, the tort operates to vindicate the *public interest* in prohibiting employers from acting in a manner contrary to fundamental public policy.

Smith v. Bates Technical Coll., 139 Wn.2d 793, 800-01, 991 P.2d 1135, 1139-40 (2000) [internal citations omitted].

The four elements of the public policy wrongful discharge tort are: (1) proof of the existence of a clear public policy (the clarity element); (2) proof that discouraging the conduct engaged in would jeopardize such public policy (the jeopardy element); (3) proof that the public policy-linked conduct caused the plaintiff's dismissal (the causation element); and (4) the defendant's inability to offer an overriding justification for the dismissal (the absence of justification element). Piel v. City of Federal Way, 117 Wn.2d 604, 611, 306 P.3d 879 (2013); Gardner v. Loomis Armored, Inc., 128 Wn.2d 931, 941, 913 P.2d 377 (1996). The 'jeopardy' and 'absence of justification' elements are at issue in this appeal.

a. Establishing Jeopardy.

To establish jeopardy, plaintiffs must show they engaged in particular conduct, and the conduct *directly relates* to the public policy, or was *necessary* for the effective enforcement of the public policy. This burden requires a plaintiff to "argue that other means for promoting the policy ... are inadequate." Additionally, the plaintiff must show how the threat of dismissal will discourage others from engaging in the desirable conduct.

Piel, supra, 117 Wn.2d at 611, quoting Gardner, supra, 128 Wn.2d at 945 (internal citations omitted).

Whether the jeopardy element is satisfied generally involves a question of fact. Korslund v. DynCorp Tri-Cities Servs., Inc., 156 Wn.2d 168, 182, 125 P.3d 119, 126 (2005); Hubbard v. Spokane County, 146 Wn.2d 699, 715, 50 P.3d 602, 610-611 (2002). However, where the inquiry is limited to examining existing laws to determine whether they provide adequate alternative means of promoting the public policy, the jeopardy element presents a question of law. Korslund, *supra*, 156 Wn.2d at 182.

That laws exist addressing the public policy at issue is not dispositive; rather, those laws must provide adequate alternative means of promoting the public policy in order to defeat the tort of wrongful discharge in violation of public policy. *See Piel*, *supra*, 117 Wn.2d at 604 (Public Employee Relations Commission (PERC) remedial scheme inadequate redress for the employer's public policy violation in retaliating against the employee for engaging in protected activity).

An employee may state a cause of action for wrongful termination if she was retaliated against for opposing a practice she objectively, reasonably believed violated the law. *See Kahn v. Salerno*, 90 Wn.App. 110, 130, 951 P.2d 321 (1998). The employee need not prove her employer engaged in illegal activity; rather, she need only prove "that she had a 'reasonable belief' that the employment practice she protested was

prohibited [by law].” See Trent v. Valley Electric Assn., Inc., 41 F.3d 524, 526-7 (9th Cir. 1994). See also 45 CFR §160.316 (making it unlawful to retaliate against a person for opposing any act or practice made unlawful by HIPAA, provided the person has a good faith belief that the practice opposed is unlawful).

In determining whether retaliatory discharge for employee whistleblowing activity states a tort claim for wrongful discharge under the public policy exception, courts generally examine the degree of alleged employer wrongdoing, together with the reasonableness of the manner in which the employee reported, or attempted to remedy, the alleged misconduct.

Dicomes v. State, 113 Wash.2d 612, 619, 782 P.2d 1002, 1007 (1989), referencing 1 L. Larson, *Unjust Dismissal* § 7.02 (1989).

b. Establishing Absence of Justification.

The ‘absence of justification’ element “inquires whether the employer has an overriding reason for terminating the employee despite the employee’s public-policy-linked conduct.” Gardner *supra*, 128 Wn.2d at 947. This element requires a court to balance the public policy concerns raised by an employee against the employer’s asserted ‘legitimate’ interests to determine whether the public policy concerns outweigh the employer’s interests. *Id.* at 948-949. To date, this element has not figured prominently in Washington jurisprudence, likely because such factual disputes require trials. See Hubbard v. Spokane County, 146

Wn.2d 699, 718, 50 P.3d 602 (2002) (dispute over whether plaintiff was fired for reasons violating public policy or due to a reorganization required a trial to determine absence of justification).

2. Ericka Acted Reasonably in Relation to Premera's Planned Wrongdoing, Preventing a Public Policy Law Violation.

Ericka expressed her HIPAA concerns on more than one occasion directly to her boss, Rick Grover, and her concerns were proven justified when Mr. Grover copied her on an email in which he confirmed Premera would not be pursuing the “risk bucketing” practice she believed would violate HIPAA. CP 186-189, ¶¶33-38. Further, after Ericka raised her concerns to Mr. Grover, Premera abandoned the risk bucketing plan as unlawful. CP at 67, and *See* P.4, *infra*. For purposes of summary judgment, the court below properly accepted Ericka’s testimony that she discussed her “risk-bucketing” concern and its potential health insurance privacy implications with Mr. Grover in mid-September 2009. CP at 16-17. Further, Premera admitted in sworn written discovery that Mr. Grover had at least one group discussion involving complaints by Ericka regarding risk-bucketing and “The group quickly determined that risk bucketing was not a lawful option for that particular situation, and ended the discussion.” CP at 67.

A material fact precluding summary judgment is created by the fact that Premera (Mr. Grover) terminated Ericka after she complained to him of a proposed risk bucketing plan that implicated health insurance privacy law violations, a plan Premera acknowledged was, indeed, unlawful. That Ms. Rickman was ignorant of the details of the plan is not dispositive. *See* CP at 17, ¶1, and *see* Appendix to Petition for Review at A-0012. Ericka's reasonable actions prevented Premera's planned wrongdoing (unlawful disclosure of private healthcare information). Under Dicomes, *supra*, Ericka's tort claim for wrongful discharge in violation of public policy survives.

Further, in Cudney v. ALSCO, 172 Wn.2d 524, 259 P.3d 244 (2011), this Court specifically endorsed the survival of the tort of wrongful discharge in violation of public policy in cases like the present one. The Cudney Court contrasted an employee being terminated after reporting an *existing* law violation with an employee being terminated after reporting a *potential* public policy law violation:

This is different from *Hubbard*, where we noted that **it is important to protect employees against retaliation when they speak up before violations of public policy occur** so that the violations can be prevented altogether. *See* 146 Wn.2d at 717, 50 P.3d 602. Hubbard was an employee of the Spokane County Planning Department, and he reported concerns about zoning violations to his direct supervisor, a decision maker on zoning issues. *Id.* at 703, 50 P.3d 602.

By speaking up, Hubbard could actually stop the alleged public policy violation.

Cudney, 172 Wn.2d at 537 (emphasis supplied).

Here, Ericka's voicing of her concerns prevented HIPAA/UHCIA violations, precisely the behavior the law encourages. Unlike the plaintiff in Dicomes, *supra*, who contradicted her supervisors' instructions in releasing information to third parties, Ms. Rickman followed her employer's protocol in raising her concerns to her supervisor, preventing disclosure of confidential information. Reporting her concerns to her direct supervisor, Premera's Vice President and General Manager for Ancillary Business and Distribution Strategy at Ucentris Insured Solutions, was reasonable and effective. Under Dicomes and Cudney, *supra*, her tort claim for retaliatory discharge in violation of public policy survives.

3. Premera's Establishment of an Anonymous "Tip" Line Does Not Shield it From the Tort of Wrongful Retaliatory Discharge in Violation of Public Policy.

The trial and appellate courts erroneously found Premera's internal, anonymous reporting mechanisms adequate to promote the public policy. CP 18, ¶5, Appendix to Petition for Review at A-0014-A0015. Determining the adequacy of an anonymous reporting system in the context of this case would require proof of how often anonymous tips of

potential law violations actually prevented unlawful activity, a purely speculative and impossible standard. The lower courts' decisions give anonymous reporting of *potential* law violations the pretense of adequacy.

The manner in which Ericka attempted to remedy Premera's planned unlawful actions was reasonable and effective, the standard the Dicomes court articulated for survival of the tort of wrongful retaliatory discharge in whistleblowing cases. *See* p.9, *supra*. Regardless, use of Premera's compliance line is not exclusive; it is optional only for those wishing to remain anonymous:

If, for whatever reason, an associate wishes to remain anonymous, Premera has established a Compliance and Ethics Hotline (EthicsLine)[.]

CP 315. Indeed, Premera's Code of Conduct encourages its employees to "do the right thing" and to "review the circumstances with your supervisor, the Compliance and Ethics Department, Human Resources, or the Legal and Regulatory Affairs Department" without fear of retaliation.

CP 313, 314, 315. Specifically, Premera's Code of Conduct provides:

Reporting Violations and Seeking Guidance

To promote reporting of legal and Code violations, Premera supports an environment of open communications. [...] You may report the matter to your supervisor, the Compliance and Ethics Department or to a member of either the Legal and Regulatory Affairs Department or Human Resources Department.

CP 314-315.

If Ericka chose to remain anonymous, Premera would be arguing that the action she actually took (reporting her concerns to her supervisor) would have been the adequate alternate means of promoting the public policy, not the anonymous "tip" line. Foreclosing Ericka's private right of action because she bravely chose the option of going directly to her supervisor rather than calling the anonymous line undermines public policy enforcement by chilling conduct the public policy demands we promote: namely, taking affirmative action to prevent disclosure of private healthcare information. Such foreclosure over-emphasizes reliance on individual pro-compliance efforts to promote the public policy and constitutes an overbroad reading of Korslund and Cudney. See Becker v. Community Health Sys., Inc., 182 Wn.App. 935, 946, 332 P.3d 1085, 1090-91, (2014), review granted, 182 Wash. 2d 1009, 343 P.3d 759 (2015). Ericka's cause of action should not be precluded because she bravely chose *not* to remain anonymous.

Assuming *arguendo* anonymous reporting of *potential* law violations were *a* means of promoting public policy, such reporting does not fully vindicate the public policy where an employee's affirmative action prevents the law violation, and the potential statutory remedies do not preclude other remedies. See Hubbard v. Spokane Cnty., 146 Wash. 2d 699, 714, 50 P.3d 602, 610 (2002), Piel, supra., 177 Wash.2d at 617,

306 P.3d at 884-85, *and see* Becker, *supra*, 182 Wash App. at 945, 948, 332 P.3d at 1090, 1091 (2014), review granted, 182 Wash. 2d 1009, 343 P.3d 759 (2015).

Distinguishing its decision in Dicomes, *supra*, this Court held in Hubbard, *supra*, that issues of material fact precluded summary judgment on the jeopardy element of the tort of wrongful discharge in violation of public policy. Hubbard, *supra*, 146 Wash.2d at 714, 50 P.3d at 610. In reaching this conclusion, the Hubbard Court reasoned that the Dicomes plaintiff alleged she was fired for reporting *alleged* illegal activity. Hubbard, *supra*, 146 Wn.2d at 624, 782 P.2d 1002. By contrast, Hubbard presented evidence that his employer acted unlawfully, and he acted to prevent further law violations; therefore, Hubbard's efforts to prevent further unlawful acts would be a protected activity precluding summary judgment on the jeopardy element. *Id.* at 714, 50 P.3d at 610. The Hubbard Court reasoned further that statutory procedures often

... left up to chance whether the public policy was enforced. In contrast, it would be more efficient to allow county employees to prevent these types of violations before they occurred.

Id., at 717, 50 P.3d at 611.

Similarly, reporting of *potential* law violations via an anonymous "tip" line in the present case would often leave enforcement of public policy up to chance. A wrongful discharge tort claim is necessary

in the present case to fully vindicate the important public policy of protecting private health care information by encouraging the bravery of actions like Ericka's without fear of retaliation.

4. Genuine issues of material fact on the 'absence of justification' element make summary judgment on this element of the tort of wrongful discharge in violation of public policy inappropriate.

The trial court erroneously found no genuine issue of material fact on the 'absence of justification' element based on the fact that that Ms. Ferrara's termination recommendation was made without her knowledge of the risk bucketing/HIPAA compliance issue. *See* CP 19, ¶2. This finding ignores the fact that Rick Grover, not Nancy Ferrara, made the decision to terminate Ericka's employment, and would have made the decision on his own. *See Grover Deposition at 127:18-22, 128:11-22, (CP 34, 83).* Viewing the facts in the light most favorably to Ericka, Mr. Grover was intimately aware of the risk bucketing/HIPAA compliance issue. *See* CP 16, ¶3 - CP 17, ¶1.

In its written documentation of Ericka's termination, Premera alleged Ericka "failed, year after year" to disclose the fact that her son, Taylor Vidor, "was hired at Ucentris as a Captive Agent[,]" and she "created a conflict of interest" by allowing her son to be "hired and promoted at Ucentris." *See Exhibit 10 to Nichols Declaration (CP 164).*

According to Rick Grover, this “conflict of interest” was the catalyst for Ericka's immediate termination. *See Grover Deposition at 127:19-25 – 128:1-13* (CP 83-84). However, Premera never “hired” Mr. Vidor. He was an independent contractor. *See Declaration of Taylor Vidor at ¶3* (CP 166). Further, Ericka did not hide the fact that Mr. Vidor was her son, disclosed this relationship to former Vice President Steve Melton (*See Rickman Declaration at ¶31*) (CP 185-186), and kept a picture of Mr. Vidor on her desk:

19

13 Q After Ms. Quaife-Hopkins told you that Taylor
Vidor was

14 Ms. Rickman’s son, did you talk to anybody else
about it?

15 A I don’t recall talking to anybody else about it.

16 Q Did you talk to Ericka Rickman about it?

17 A I didn’t talk to Ericka about it. I do recall going
into her

18 office and then seeing pictures of her kids in her
office and

19 making the connection, Oh, that’s him.

20 Q So Ericka didn’t try to hide the fact that he was her
son?

21 A Correct.

[...]

46

21 Q Do you recall telling Ms. Ferrara that it was not a
secret that

22 Taylor was Ericka’s son?

23 A I don’t recall saying that to Nancy. It’s a true
statement.

24 Q And why do you say that's a true statement; it wasn't a secret?

25 A Because everybody within the organization, within our agency,

47

1 was aware.

Stryker Deposition (Exhibit 3 to Nichols Declaration) at 19:13-21, (CP 88), 46:21-25, (CP 94), and 47:1 (CP 176). See also Declaration of Taylor Vidor at ¶4 (CP 166), and Declaration of Matt Sanelli at ¶4 (CP 176).

In fact, Nancy Ferrara, Premera's Associate Relations Manager and former Human Resources Supervisor, contradicts Mr. Grover's testimony that the "conflict of interest" allegedly created by Ericka's "nondisclosure" of Mr. Vidor was the reason for her immediate termination, saying it was due to "judgment and lack of integrity":

51

2 A The conflict of interest -- the fact that Ms. Rickman did not
3 disclose her son on the conflict of interest was not the reason
4 that she was terminated necessarily. It was really due to
5 judgment and lack of integrity.

[...]

53

4 Q Okay. So I understand the conflict of interest concern was a
5 compliance issue.

6 A Yes.

7 Q And you testified Ms. Rickman was not terminated for that
8 issue, for the nondisclosure of Mr. Vidor as her son; is that
9 correct --

10 MS. SHERWOOD: Objection. Mischaracterizes.
11 A That was not the reason for the termination.

*Ferrara Deposition (Exhibit 4 to Nichols Declaration) at 51:2-5,(CP 115),
53:4-11 (CP 117).*

Ericka raised genuine issues of material fact regarding the legitimacy of Premera's alleged reasons for her termination. No conflict of interest existed, as Premera was well aware for years that one of its "Captive Agents" was Ericka's son. CP 88, 94, 166, 176. The motives of the person making the ethics complaint against Ericka were suspect. CP 165-177. Rick Grover disliked Ericka's ethics in questioning the risk bucketing plan and, in part, used the findings of the flawed ethics investigation to terminate her employment. Ericka more than met her burden of production on the 'absence of justification' element. The trial court erred in finding otherwise. This matter should be remanded to the Court of Appeals for address this issue.

F. CONCLUSION:

Discouraging Ericka's conduct of reporting potential breaches of private patient information jeopardizes the clear public policy in favor of maintaining and protecting patient privacy interests articulated in both HIPAA and WUHCIA. Premera's establishment of an anonymous "tip" line is an inadequate means of promoting the public policy. Finally,

genuine issues of material fact exist on the 'absence of justification' element. Therefore, the trial and appellate courts erred in granting Premera's summary judgment motion on these bases. The appellate court's decision should be reversed, and this matter should be remanded to the appellate court for consideration of the 'absence of justification' element.

DATED this 20 day of April, 2015.

DENO MILLIKAN LAW FIRM, PLLC



JOEL P. NICHOLS, WSBA #23353
Attorney for Appellant, Ericka Rickman

DECLARATION OF SERVICE

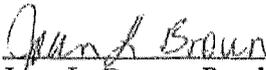
I, JOAN L. BROWN, DECLARE THAT THE FOLLOWING IS
MY VOLUNTARY SWORN STATEMENT:

On April 20, 2015 I sent out via e-mail (by agreement of the parties) and by regular U.S. Mail, Postage prepaid, a true and correct copy of the SUPPLEMENTAL BRIEF OF PETITIONER to:

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Robert M. Howie (rhowie@riddellwilliams.com)
Riddell Williams, PS
1001 Fourth Avenue, Suite 4500
Seattle, WA 98154-1192

I declare under penalty of perjury of the laws of the State of Washington that the foregoing is true and correct.

Executed at Everett, Washington this 20th day of April, 2015



Joan L. Brown, Paralegal

OFFICE RECEPTIONIST, CLERK

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Subject: RE: Rickman v. Premera Blue Cross

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From: Joan Brown [mailto:jbrown@denomillikan.com]
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To: OFFICE RECEPTIONIST, CLERK
Subject: Rickman v. Premera Blue Cross

Good Afternoon –
Attached please find a Supplemental Brief of Petitioner

Filed by:
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Thank you,

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